

FINAL INITIAL STUDY / MITIGATED NEGATIVE DECLARATION

COLFAX CHARTER ELEMENTARY SCHOOL

CLASSROOM ADDITION PROJECT

LOS ANGELES UNIFIED SCHOOL DISTRICT



MAY 2017

FINAL INITIAL STUDY / MITIGATED NEGATIVE DECLARATION

LOS ANGELES UNIFIED SCHOOL DISTRICT

COLFAX CHARTER ELEMENTARY SCHOOL

CLASSROOM ADDITION PROJECT

Prepared for:

Los Angeles Unified School District
Office of Environmental Health and Safety
333 South Beaudry Avenue, 21st Floor
Los Angeles, California 90017

Prepared by:

PCR Services Corporation
233 Wilshire Boulevard, Suite 150
Santa Monica, California 90401

MAY 2017



PREFACE TO FINAL INITIAL STUDY/MITIGATED NEGATIVE DECLARATION AND SUMMARY OF OUTREACH EFFORTS

This Final Initial Study/Mitigated Negative Declaration (IS/MND) has been prepared for the Los Angeles Unified School District (District) Colfax Charter Elementary School Classroom Addition Project (“project”), located in the Valley Village Community of the City of Los Angeles, in accordance with the requirements of the California Environmental Quality Act (CEQA).

The potential environmental impacts of the project were previously the subject of a Draft IS/MND, which was made available for public review and comment on February 2, 2017, beginning a 30-day review period that ended March 3, 2017. The Notice of Intent to Adopt an IS/MND included detailed information regarding locations in the community where the IS/MND could be reviewed, as well as electronic access to project documents. Copies of the Notice of Intent to Adopt an IS/MND were directly mailed to owners and occupants of properties within a 300-foot radius of the project site and were also distributed, via certified mail, to 130 governmental and regulatory agencies, elected officials, community organizations, and other relevant potential stakeholders. The Notice of Intent to Adopt an IS/MND was also posted in the classified section of the *Los Angeles Daily News* newspaper, posted in a public location by the Registrar/Recorder of the Los Angeles County Clerk, and displayed at the project site during the public review and comment period. The State of California Governor’s Office of Planning and Research Unit (the “State Clearinghouse”) submitted copies of the Draft IS/MND to responsible and reviewing agencies.

Comment letters that were received are presented in Attachment D, *Responses to Comments*, of this Final IS/MND, along with the District’s responses to each comment. The District, as the CEQA Lead Agency, will submit this Final IS/MND to the Board of Education for certification on May 9, 2017. The Final IS/MND also includes the Mitigation Monitoring and Reporting Program (MMRP), provided as Attachment C of this document. The MMRP, which provides the mitigation program for the project, will also require adoption by the Board of Education, pursuant to California Public Resources Code Section 21081.6, thereby ensuring that all recommended mitigation measures identified for the proposed project are implemented, and in so doing, minimizing identified environmental effects. Text in this Final IS/MND which has been omitted from the Draft MND is presented in ~~strikeout~~, and text which has been added is underlined. Of note, LAUSD Standard Conditions which were already applicable to Cultural Resources have now been applied to Tribal Cultural Resources, as noted on page B-86 of this Final IS/MND. Other than minor editorial changes, there are no other substantive edits to the Final IS/MND.

Los Angeles Unified School District

Office of Environmental Health and Safety

CALIFORNIA ENVIRONMENTAL QUALITY ACT

INITIAL STUDY

CHECKLIST

LEAD AGENCY: Los Angeles Unified School District	SCHOOL SITE: Colfax Charter Elementary School	DATE: February 2, 2017
SCHOOL SITE ADDRESS: 11724 Addison Street, North Hollywood, CA 91607		LOCAL DISTRICT: Northeast
PROJECT TITLE: Colfax Elementary School Classroom Addition Project		COLIN ID: 10366871

PROJECT DESCRIPTION:

The Los Angeles Unified School District ("LAUSD" or "District") is proposing the Colfax Charter Elementary School Classroom Addition Project (the "project" or "proposed project"). The facility upgrades proposed at LAUSD's Colfax Charter Elementary School (the "school" or "Colfax") campus include the construction of 18 new classrooms, removal of ten portable classrooms situated in five buildings, interior modifications to administrative spaces, an expanded lunch shelter and arcade, relocation of the school's main entry from Addison Street to Colfax Avenue, and realignment of the existing surface parking lot. The project would increase student capacity at Colfax by up to 160 new students, allowing the school to accommodate current and anticipated resident enrollment. The need for the project is to provide Colfax with facilities that are safe, secure and aligned with the school's instruction program, as well as provide for improved campus circulation and on-site parking for faculty, staff and visitors.

ENVIRONMENTAL SETTING:

The approximately 8.1-acre school is situated on its own square block. The main entrance of the school is along Addison Street, where there is a student drop-off and pick-up lane. Students in First through Fifth grade enter the campus through the main Addison Street entrance, and Kindergarten students access the campus via a separate gate on Morella Avenue. There are approximately 54 parking spaces available for faculty, staff and visitors, which are located in the main parking lot along the Addison Street school entrance, and in a lot accessed from Colfax Avenue, by the Administration Building and the hardcourt play area.

The school site occupies a single level, with campus buildings typically consisting of a one-story, wood frame construction, with the exception of the Multi-Purpose Building (assembly/cafeteria building), which is taller (approximately two stories). There are four permanent classroom building branches, including the Library, which are organized linearly and connecting the southern playground and primary entry arcade, located at the north side of the campus. Kindergarten classrooms and playgrounds are located at the eastern end of the main arcade. Between each classroom building are outdoor spaces which function as outdoor learning and garden spaces. In addition to the permanent classroom buildings, there are portable classroom structures onsite, on the eastern side of the campus adjacent to the staff parking lot. An LAUSD Transportation Office trailer is located at the southernmost end of the campus. Outdoor spaces include an open hardscape play yard, a grass play field, courtyards, a vegetable garden, and a small farm are, which includes small pens where several domesticated farm animals are kept (e.g., chickens, ducks, rabbits, and sheep). Mature trees line the perimeter of the school site.

Colfax Charter Elementary School was found eligible as a historic district under the California Register Criterion 1, as an excellent example of Mid-Century Modern style applied to institutional architecture, reflecting the rapid postwar suburban expansion of the San Fernando Valley, as defined in the LAUSD Historic Context Statement. Colfax ES was assigned a California Historical Resource status code of 3CD, "appears

Los Angeles Unified School District

Office of Environmental Health and Safety

eligible for the California Register as a contributor to a California Register eligible district through survey evaluation.” However, the Campus was not found eligible for the National Register of Historic Places. Significant features include the finger plan school, with its shared courtyards, the covered arcade/walkway connecting the north and south elevations (oriented east-west), the landscape and open space fronting Addison Street, and the mature trees lining the perimeter of the school site. As such, the defined portions of the school are considered an historical resource, as defined by the California Environmental Quality Act (CEQA).

PROJECT LOCATION:

The proposed project is located at LAUSD’s Colfax Charter Elementary School campus, at 11724 Addison Street, (APN 2355013900) in the Valley Village Community of the City of Los Angeles. The site is located in a suburban residential neighborhood approximately 11 miles northwest of Downtown Los Angeles and 12 miles northeast of the Pacific Ocean. The school takes up an entire block, bordered on the north by Addison Street, on the east by Colfax Avenue, on the south by Huston Street, and on the west by Morella Avenue.

Regional transportation facilities serving the project vicinity include the Hollywood Freeway (SR 170), located approximately 0.4 mile east of the project site, and the Ventura Freeway (I-101), located approximately 0.3 mile south of the project site. Local access to the Hollywood Freeway is provided by Magnolia Boulevard and Tujunga Avenue, and the Ventura Freeway is accessed by Tujunga Avenue and Laurel Canyon Boulevard. Direct access to the site is provided by Addison Street and Colfax Avenue.

EXISTING ZONING: PF-1VL (Public Facilities, Height District 1, Very Limited)	EXISTING LAND USE DESIGNATION: Public Facilities	<input type="checkbox"/> REQUIRES STATE FUNDING
--	--	--

SURROUNDING LAND USES:

Colfax Charter Elementary School is located in the Valley Village neighborhood of North Hollywood within the City of Los Angeles on an 8.1-acre site. The campus is located east of the 405 Freeway and west of the 170 Freeway. The school is predominantly surrounded by single-family residential uses on all sides, as well as some multi-family uses. Faith Presbyterian Church and an associated surface parking lot are located at the northeast corner of Addison Street and Colfax Avenue.

OTHER PUBLIC AGENCY APPROVALS:

- LAUSD Certification of a Mitigated Negative Declaration;
- LAUSD Adoption of a Mitigation Monitoring and Reporting Program;
- Grading, excavation, foundation, and associated building permits;
- Division of State Architect;
- Los Angeles Fire Department; and
- Other permits and approvals as deemed necessary.

Los Angeles Unified School District

Office of Environmental Health and Safety

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 Significance |
| <input type="checkbox"/> Greenhouse Gas Emissions | <input type="checkbox"/> Population & Housing | |

DETERMINATION

On the basis of this initial evaluation:

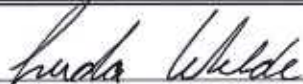
I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

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

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

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

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



SIGNATURE

FEBRUARY 2, 2017

DATE

LINDA WILDE

PRINTED NAME

CEQA PROJECT MANAGER

TITLE

EVALUATION OF ENVIRONMENTAL IMPACTS:

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

ENVIRONMENTAL IMPACTS

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

I. AESTHETICS. Would the project:

- | | | | | |
|---|--------------------------|-------------------------------------|-------------------------------------|--------------------------|
| a. Have a substantial adverse effect on a scenic vista? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings, or other locally recognized desirable aesthetic natural feature within a state scenic highway? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| c. Substantially degrade the existing visual character or quality of the site and its surroundings? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

Explanation:

See Attachment B, Explanation of Checklist Determinations.

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

- | | | | | |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, 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"/> |

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Explanation:

See Attachment B, Explanation of Checklist Determinations.

III. AIR QUALITY. Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:

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

Explanation:

See Attachment B, Explanation of Checklist Determinations.

IV. BIOLOGICAL RESOURCES. Would the project:

a. Have a substantial adverse effect, either directly or through habitat modification, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in the City or regional plans, policies, regulations by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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 checked="" type="checkbox"/>	<input 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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Explanation:

See Attachment B, Explanation of Checklist Determinations.

V. CULTURAL RESOURCES: Would the project:

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

Explanation:

See Attachment B, Explanation of Checklist Determinations.

VI. GEOLOGY AND SOILS. Would the project:

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

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
ii. Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii. Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv. Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potential result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Explanation:

See Attachment B, Explanation of Checklist Determinations.

VII. GREENHOUSE GAS EMISSIONS. Would the project:

a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Explanation:

See Attachment B, Explanation of Checklist Determinations.

VIII. HAZARDS AND HAZARDOUS MATERIALS.

Would the project:

a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	<input 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"/>

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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 type="checkbox"/>	<input checked="" 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"/>

Explanation:

See Attachment B, Explanation of Checklist Determinations.

IX. HYDROLOGY AND WATER QUALITY. Would the project result in:

a. Violate any water quality standards or waste discharge requirements?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input 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 type="checkbox"/>	<input checked="" type="checkbox"/>
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off site?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f. Otherwise substantially degrade water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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

Explanation:

See Attachment B, Explanation of Checklist Determinations.

X. LAND USE AND PLANNING. Would the project:

a. Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Conflict with applicable land use plan, policy or regulation of an agency with jurisdiction over the project (including but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Conflict with any applicable habitat conservation plan or natural community conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Explanation:

See Attachment B, Explanation of Checklist Determinations.

XI. MINERAL RESOURCES. Would the project:

a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Explanation:

See Attachment B, Explanation of Checklist Determinations.

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

XII. NOISE. Would the project result in:

- | | | | | |
|---|--------------------------|-------------------------------------|-------------------------------------|-------------------------------------|
| a. Exposure of persons to or generation of noise in level in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input 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"/> |

Explanation:

See Attachment B, Explanation of Checklist Determinations.

XIII. PEDESTRIAN SAFETY. Would the project:

- | | | | | |
|--|--------------------------|-------------------------------------|--------------------------|-------------------------------------|
| a. Substantially increase vehicular and/or pedestrian safety hazards due to a design feature or incompatible uses? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| b. Create unsafe routes to schools for students walking from local neighborhoods? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" 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 type="checkbox"/> | <input checked="" type="checkbox"/> |

Explanation:

See Attachment B, Explanation of Checklist Determinations.

XIV. POPULATION AND HOUSING. Would the project:

- | | | | | |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a. Induce substantial population growth in an area either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b. Displace substantial numbers of existing housing necessitating the construction of replacement housing elsewhere? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

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

Explanation:

See Attachment B, Explanation of Checklist Determinations.

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

a. Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Explanation:

See Attachment B, Explanation of Checklist Determinations.

XVI. RECREATION.

a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Explanation:

See Attachment B, Explanation of Checklist Determinations.

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

XVII. TRANSPORTATION/CIRCULATION. Would the project:

- | | | | | |
|--|--------------------------|-------------------------------------|-------------------------------------|-------------------------------------|
| a. Conflict with an applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| b. Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input 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 type="checkbox"/> | <input checked="" type="checkbox"/> |
| e. Result in inadequate emergency access? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" 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 type="checkbox"/> | <input checked="" type="checkbox"/> |

Explanation:

See Attachment B, Explanation of Checklist Determinations.

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:

- | | | | | |
|---|--------------------------|-------------------------------------|--------------------------|--------------------------|
| a. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
|---|--------------------------|-------------------------------------|--------------------------|--------------------------|

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Explanation:

See Attachment B, Explanation of Checklist Determinations.

XIX. UTILITIES. Would the project:

a. Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Have sufficient water supplies available to serve the project from existing entitlements and resource, or are new or expanded entitlements needed?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input 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 checked="" type="checkbox"/>	<input 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 type="checkbox"/>	<input checked="" type="checkbox"/>

Explanation:

See Attachment B, Explanation of Checklist Determinations.

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

XX. MANDATORY FINDINGS OF SIGNIFICANCE.

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

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
--------------------------	--------------------------	-------------------------------------	--------------------------

b. Does the project have impacts which are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of 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"/>
--------------------------	--------------------------	-------------------------------------	--------------------------

Explanation:

See Attachment B, Explanation of Checklist Determinations.

Table of Contents

	Page
PREFACE	
INITIAL STUDY CHECKLIST	
TABLE OF CONTENTS	i
LIST OF FIGURES	iii
LIST OF TABLES	iii
ATTACHMENT A: PROJECT DESCRIPTION	A-1
A. Introduction	A-1
B. Project Location and Surrounding Uses	A-2
C. Site Background and Existing Conditions.....	A-5
D. Description of Proposed Project.....	A-6
E. Necessary Approvals	A-21
ATTACHMENT B: EXPLANATION OF CHECKLIST DETERMINATIONS	B-1
I. Aesthetics	B-1
II. Agriculture and Forest Resources.....	B-6
III. Air Quality	B-7
IV. Biological Resources.....	B-19
V. Cultural Resources	B-25
VI. Geology and Soils	B-33
VII. Greenhouse Gas Emissions	B-37
VIII. Hazards and Hazardous Materials.....	B-42
IX. Hydrology and Water Quality	B-47
X. Land Use and Planning	B-53
XI. Mineral Resources	B-54
XII. Noise.....	B-55
XIII. Pedestrian Safety	B-70
XIV. Population and Housing.....	B-72
XV. Public Services	B-73
XVI. Recreation.....	B-76
XVII. Transportation/Traffic.....	B-77
XVIII. Tribal Cultural Resources.....	B-85
XIX. Utilities and Service Systems	B-86
XX. Mandatory Findings of Significance	B-91
ATTACHMENT C: MITIGATION MONITORING AND REPORTING PROGRAM	C-1
ATTACHMENT D: RESPONSES TO COMMENTS	D-1

APPENDIX A: AIR QUALITY WORKSHEETS

Appendix A.1 Construction Emissions

Appendix A.2 Operational Emissions

APPENDIX B: COLFAX TREE SURVEY

**APPENDIX C: SECRETARY OF INTERIOR STANDARDS REVIEW AND CHARACTER DEFINING FEATURES
MEMORANDUM**

APPENDIX D: GEOTECHNICAL EVALUATIONS

Appendix D.1: Updated Geotechnical Investigation

Appendix D.2: Geotechnical Investigation

APPENDIX E: PHASE I ENVIRONMENTAL SITE ASSESSMENT

APPENDIX F: NOISE CALCULATIONS

Appendix F.1: Construction Noise Calculations without Noise Barrier

Appendix F.2: Construction Noise Calculations with Noise Barrier

Appendix F.3: Off-Site Construction Traffic Noise Calculations

Appendix F.4: Off-Site Traffic Noise Calculations

APPENDIX G: TRAFFIC STUDY

List of Figures

	Page
Figure A-1 Regional and Vicinity Map.....	A-3
Figure A-2 Aerial Photograph.....	A-4
Figure A-3 Existing Site Plan.....	A-9
Figure A-4 Proposed Site Plan.....	A-10
Figure A-5 Proposed Classroom and Administration Building Site Views.....	A-11
Figure A-6 Proposed Classroom and Administration Building Floor Plan – First Floor.....	A-13
Figure A-7 Proposed Classroom and Administration Building Floor Plan – Second Floor.....	A-14
Figure A-8 Proposed Kindergarten Building Rendering.....	A-15
Figure A-9 Proposed Kindergarten Building Floor Plan.....	A-16
Figure A-10 Repurposed Administration Building Floor Plan.....	A-17
Figure A-11 New Parking Lot Plan.....	A-20
Figure B-1 Noise Measurement Locations.....	B-58
Figure B-2 Location of Project and Analyzed Intersections.....	B-79

List of Tables

	Page
Table A-1 Proposed Development Program.....	A-6
Table B-1 Unmitigated Regional Construction Emissions ^a (pounds per day).....	B-12
Table B-2 Project-Related Operational Emissions ^a (Pounds per Day).....	B-13
Table B-3 Unmitigated Localized Construction Emissions ^a (pounds per day).....	B-16
Table B-4 Tree Disposition List.....	B-21
Table B-5 Annual Greenhouse Gas Emissions.....	B-41
Table B-6 Summary of Ambient Noise Measurements.....	B-59
Table B-7 Estimate of Construction Noise Levels (L _{eq}) at Sensitive Receptor Locations.....	B-60
Table B-8 Estimate of Construction Noise Levels (L _{eq}) at Sensitive Receptor Locations.....	B-63
Table B-9 Off-Site Traffic Noise Impacts.....	B-66
Table B-10 Estimated Project Trip Generation.....	B-78
Table B-11 Project Directional Trip Distribution Percentages.....	B-80
Table B-12 Impact Summary for Existing (Year 2016) and Future (Year 2018) Traffic Conditions.....	B-81
Table B-13 Landfills Used by Los Angeles Regional Authority.....	B-89
Table D-1 Summary of Comment Letters and Commenters.....	D-1

ATTACHMENT A

PROJECT DESCRIPTION

ATTACHMENT A: PROJECT DESCRIPTION

A. INTRODUCTION

The Los Angeles Unified School District (“LAUSD” or “District”) is proposing the Colfax Charter Elementary School Classroom Addition Project (the “project” or “proposed project”). The facility upgrades proposed at LAUSD’s Colfax Charter Elementary School (the “school” or “Colfax”) campus include the construction of 18 new classrooms, removal of ten portable classrooms situated in five buildings, interior modifications to administrative spaces, an expanded lunch shelter and arcade, relocation of the school’s main entry from Addison Street to Colfax Avenue, and realignment of the existing surface parking lot. The need for the project is to provide Colfax with facilities that are safe, secure and aligned with the school’s instruction program, as well as provide for improved campus circulation and on-site parking for faculty, staff and visitors.

The proposed project involves discretionary actions; therefore, environmental review to assess potential impacts associated with implementation of the proposed project is required in accordance with the California Environmental Quality Act (CEQA).¹ LAUSD is the Lead Agency for the proposed project under CEQA.

1. School Upgrade Program Draft Environmental Impact Report

In November 2015, the LAUSD Board of Education (Board) certified the School Upgrade Program (SUP) Final Environmental Impact Report (“Program EIR”), which provides environmental review for the SUP in accordance with CEQA requirements.² The Program EIR provides the framework for evaluating environmental impacts related to ongoing facility upgrade projects planned by the District.³ 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:⁴

- 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.⁵ The evaluation of environmental impacts related to Type 2 projects, and the appropriate project design features and mitigation measures to incorporate, are provided in the Program EIR.

¹ *California Environmental Quality Act (CEQA), Public Resources Code (PRC), §21000 et seq.*

² *Los Angeles Unified School District, School Upgrade Program Final EIR, September 2015.*

³ *Ibid, at 4-8.*

⁴ *Ibid, at 1-7.*

⁵ *Ibid, at 1-8 and 1-13.*

The Program EIR has been certified by the Board so the general environmental analysis, LAUSD Standard Conditions of Approval and project design features provided are incorporated in this Mitigated Negative Declaration (MND).⁶ This MND, where applicable, incorporates the Program EIR by reference, thereby providing project-level analysis that concentrates on site-specific issues related to the project. The Program EIR is available for review at the LAUSD Office of Environmental Health and Safety website at <http://achieve.lausd.net/CEQA>.

B. PROJECT LOCATION AND SURROUNDING USES

The proposed project is located at LAUSD's Colfax Charter Elementary School campus, at 11724 Addison Street, (APN 2355013900) in the Valley Village Community of the City of Los Angeles (the "City"). (See **Figure A-1**, *Regional and Vicinity Map*, and **Figure A-2**, *Aerial Photograph*).

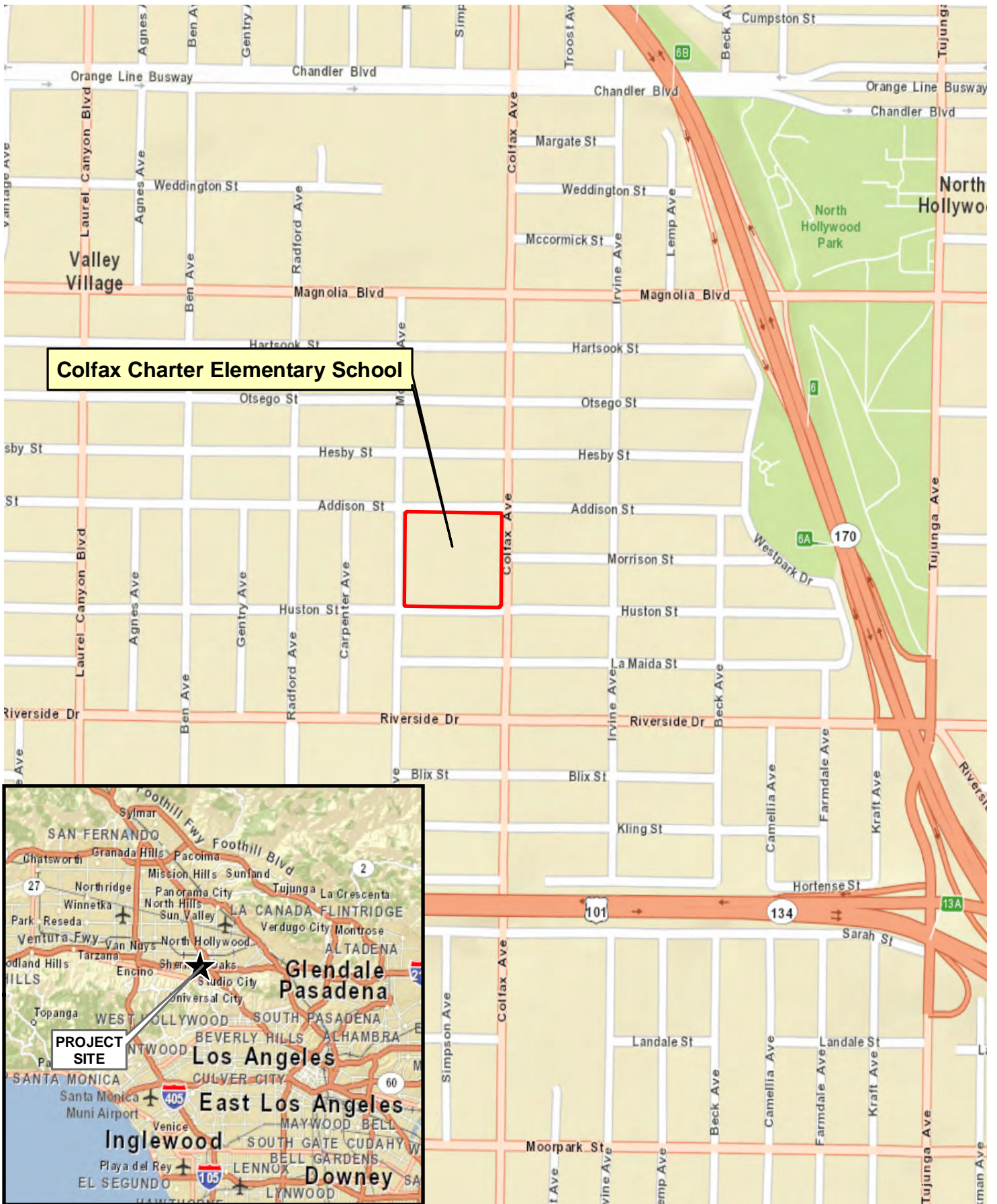
The project site is situated upon approximately 8.1 acres in a suburban residential area located approximately 11 miles northwest of downtown Los Angeles and 12 miles northeast of the Pacific Ocean. The school takes up an entire block, bordered on the north by Addison Street, on the east by Colfax Avenue, on the south by Huston Street, and on the west by Morella Avenue. Project implementation will not occur across the entire school campus, but on selected areas undergoing renovation.

Currently, the school's main entrance is located along Addison Street. The school is predominantly surrounded by single-family residential uses on all sides, as well as some multi-family uses. Faith Presbyterian Church and an associated surface parking lot are located at the northeast corner of Addison Street and Colfax Avenue.

Regional transportation facilities serving the project vicinity include the Hollywood Freeway (SR 170), located approximately 0.4 mile east of the project site, and the Ventura Freeway (I-101), located approximately 0.3 mile south of the project site. Local access to the Hollywood Freeway is provided by Magnolia Boulevard and Tujunga Avenue, and the Ventura Freeway is accessed by Tujunga Avenue and Laurel Canyon Boulevard. Direct access to the site is provided by Addison Street and Colfax Avenue.

Transit service to the project site is provided by the Los Angeles County Metropolitan Transportation Authority (Metro), which operates Bus Lines 155 and 183. Bus Line 155 operates in Valley Village along Riverside Drive, with the closest stop to the school two blocks away (about 0.15 mile) at the corner of Colfax Avenue and Riverside Drive. Bus Line 183 also operates in Valley Village along Magnolia Boulevard, with the closest stop to the school located four blocks to the north, along Magnolia Boulevard and Colfax Avenue. Regional Service is provided by the Metro Orange Line Busway, along Chandler Boulevard, which offers a limited number of service stops for faster routes. The nearest Metro Orange Line Station is located at Laurel Canyon Boulevard and Chandler Boulevard, approximately 0.6 mile northwest of the school.

⁶ *Ibid*, at 4-32 to 4-67.



Colfax Charter Elementary School



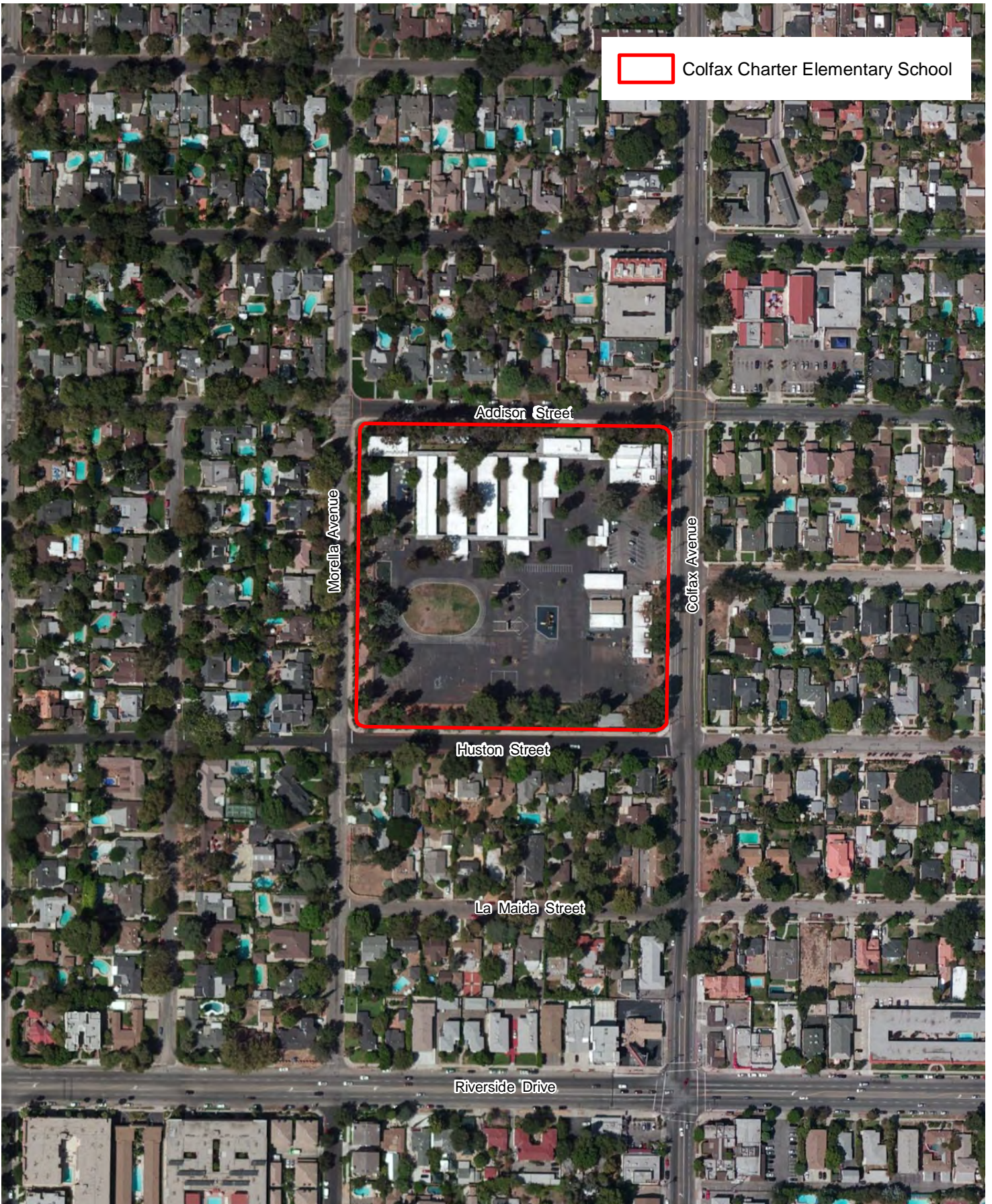
0 800 1,600 Feet

Regional and Vicinity Map

Colfax Charter Elementary School Classroom Addition Project
 Source: ESRI Street Map, 2009; ESA PCR, 2016.

FIGURE

A-1



Colfax Charter Elementary School

Addison Street

Morella Avenue

Colfax Avenue

Huston Street

La Maida Street

Riverside Drive



0 250 500 Feet

Aerial Photograph

Colfax Charter Elementary School Classroom Addition Project
Source: USDA FSA, 2014 (Aerial); ESA PCR, 2016.

FIGURE
A-2

C. SITE BACKGROUND AND EXISTING CONDITIONS

From 1902 to 1951 this site was utilized as a private arboretum, housing a collection of trees owned and maintained by Dr. A.F. Schiffman. Colfax Elementary School was built in 1950, opened in 1951, and has been operating as an elementary school on the site since that time.⁷ In 2010, the school enrollment was capped and a boundary change was put in place to respond to an increase in neighborhood enrollment. The campus is currently unable to accommodate all the students that reside within its enrollment boundaries and enrollment projections for the area indicate a steady increase in the attendance area over the next five to ten years.⁸

The school currently operates on a two-semester calendar, running from early August to early June. There were 674 students enrolled in Kindergarten through Fifth Grade during the 2015/2016 academic year.⁹ More than 90 percent of the students enrolled are from the resident area (homes located within the attendance boundary of the school). School operating hours are from 8:00 a.m. to 3:00 p.m., Monday through Friday. There are 27 teachers and eight staff working at the school. There are currently 30 classrooms operating at Colfax in a combination of permanent buildings and portable classroom structures.

The project site is zoned PF-1VL (Public Facilities – Height District 1 – Very Limited), and has a corresponding General Plan land use designation of Public Facilities.¹⁰ The approximately 8.1-acre school is situated on its own square block. The main entrance of the school is along Addison Street, where there is a student drop-off and pick-up lane. Students in First through Fifth grade enter the campus through the main Addison Street entrance, and Kindergarten students access the campus via a separate gate on Morella Avenue. There are approximately 54 parking spaces available for faculty, staff and visitors, which are located in the main parking lot along the Addison Street school entrance, and in a lot accessed from Colfax Avenue, by the Administration Building and the hardcourt play area.

The school site contains one-story, wood frame buildings, with the exception of the Multi-Purpose Building (assembly/cafeteria building), which is approximately two stories. There are four permanent classroom building branches, including the Library, which are organized linearly and connecting the southern playground and primary entry arcade, located at the north side of the campus. Kindergarten classrooms and playgrounds are located at the eastern end of the main arcade. Between each classroom building are outdoor spaces which function as outdoor learning and garden spaces. In addition to the permanent classroom buildings, there are portable classroom structures, on the eastern side of the campus adjacent to the staff parking lot. An LAUSD Transportation Office trailer is located at the southernmost end of the campus. Outdoor spaces include an open hardscape play yard, a grass play field, courtyards, a vegetable garden, and a small farm area, which includes small pens where several domesticated farm animals are kept (e.g., chickens, ducks, rabbits, and sheep). Mature trees line the perimeter of the school site.

Colfax Charter Elementary School was found eligible as a historic district under the California Register Criterion 1, as an excellent example of Mid-Century Modern style applied to institutional architecture,

⁷ Colfax Charter Elementary School, Colfax History. <https://colfaxcharter-laUSD-ca.schoolloop.com/history>. Accessed April 2016.

⁸ Los Angeles Unified School District Board of Education, Report Number 466-14-/15 (May 12, 2015).

⁹ Los Angeles Unified School District, communication with Master Planning and Demographics unit, April 7, 2016.

¹⁰ City of Los Angeles Department of City Planning, Zoning Information and Map Access System (ZIMAS) database search. Website: zimas.lacity.org. Accessed April 2016.

reflecting the rapid postwar suburban expansion of the San Fernando Valley, as defined in the LAUSD Historic Context Statement.^{11, 12} Colfax ES was assigned a California Historical Resource status code of 3CD, “appears eligible for the California Register as a contributor to a California Register eligible district through survey evaluation.” However, the Campus was not found eligible for the National Register of Historic Places. Significant features include the finger plan school, with its shared courtyards, the covered arcade/walkway connecting the north and south elevations (oriented east-west), the landscape and open space fronting Addison Street, and the mature trees lining the perimeter of the school site.¹³ As such, the defined portions of the school are considered an historical resource, as defined by CEQA.

D. DESCRIPTION OF PROPOSED PROJECT

The project would increase student capacity at Colfax by up to 160 new students and eight staff members, allowing the school to accommodate current and anticipated resident enrollment. (See **Table A-1, Proposed Development Program.**)

Table A-1
Proposed Development Program

Proposed New Building Area in square feet (sf)			
Administration Area		3,347 sf	
Kindergarten Area		2,922 sf	
Classrooms & Support Services Area		25,617 sf	
Lunch Shelter Area		1,496 sf	
Exterior Covered Walkways		6,078 sf	
Total Building Area		39,460 sf	
	Required by CDE	Existing	Providing
Playground Areas			
Grades 1 through 5 (Main Play Area)	95,200 sf	152,512 sf	133,866 sf
Kindergarten Play Area	11,900 sf	9,995 sf	11,927 sf
Parking Spaces	86	54	86

Source: LAUSD May 2016

New Facilities

The proposed project will provide additional classroom capacity to accommodate a projected increase of students in the attendance area and allow the neighborhood students currently capped out to return to their neighborhood school. (See **Figure A-3, Existing Site Plan**, and **Figure A-4, Proposed Site Plan.**) The proposed

¹¹ Sapphos Environmental, Inc., Los Angeles Unified School District: Historic Context Statement, 1870 to 1969 (March 2014). 2014).

¹² Sapphos Environmental, Inc., Debi Howell-Ardila, MHP, DPR Form: Colfax Avenue Elementary School, Prepared for LAUSD (January 24, 2014).

¹³ PCR Services Corporation, Character-Defining Features Memorandum (CDFM) for Colfax Avenue Elementary School, 11724 Addison Street, North Hollywood, California 91607 (May 11, 2016).

project will include the removal of ten portable classrooms and the construction of 18 permanent classrooms, for a net gain of eight classrooms. The proposed two-story Classroom and Administration Building will house 16 classrooms and two administration rooms/spaces. A new Kindergarten Building, housing two new Kindergarten classrooms, will be constructed by the existing Kindergarten area. New administrative and support spaces will also be provided, as well as an expanded lunch shelter area. All new facilities will be connected to the existing, covered walkway/arcade system, while maintaining the integrity of historical features. New landscaping will be installed, new and reconfigured facilities will be furnished and equipped, utilities will be upgraded, and improvements required by the Americans with Disabilities Act (ADA) will be completed.

Parking and Circulation Improvements

The main entry of the school will be relocated from Addison Street to Colfax Avenue. New and renovated parking for faculty, staff and visitors will be developed, thereby improving vehicular circulation and access and creating a safer pedestrian environment for students. The existing surface parking lot along Addison Street will remain in its current location. The parking lot accessed from Colfax Avenue will be relocated to the southeastern corner of the campus and will include an internal student pick-up/drop-off area. This will increase on-site staff and visitor parking by 32 spaces, for a total of 86 on-site spaces.

1. Project Design

Construction of the project would be implemented in three phases. Phase 1 would include site preparation activities, such as relocation of electric and wet utilities, preparation of an on-site construction staging area, construction of interim housing, and removal of the portable classroom structures. The new two-story Classroom and Administration building would be constructed, along with the new expanded lunch shelter and covered walkway/arcade. A new digital marquee will also be installed at the corner of Addison Street and Colfax Avenue. Existing play equipment at the Kindergarten area would be relocated and the new Kindergarten Building would be constructed. The Kindergarten area would be restriped, and an upgraded path of travel would be established to link the Kindergarten to the Multi-Purpose Building and Library. Food preparation area and kitchen upgrades would also be completed. Phase 2 of the project would involve relocating the existing administrative uses into the new Classroom and Administration Building and reusing the existing Administrative Building. The Transportation Office trailer would also be removed. Phase 3 of the project would entail restriping to create the new parking lot and student pick-up/drop-off area, followed by landscaping. The hardscape play area for the school would decrease by approximately 16,714 square feet; however, the remaining play area would still be in excess of California Department of Education (CDE) standard requirements (see Table A-1).

a. New Classroom and Administration Building

The new approximately 25,617 square-foot Classroom and Administration Building would be two stories in height and would be located along Colfax Avenue, at the site of the existing 42-space parking lot, immediately adjacent to the new primary entrance to the school. A total of 16 new classrooms will be housed in this building. Administrative offices, including Principal and Assistant Principal offices, main office, clerical space, health unit, storage space, and other school support service offices will be located on the first floor along with six classrooms. New restrooms for faculty/staff and students and an elevator would also be provided in addition to a stairway to access the second floor. The second floor of the Classroom and Administration Building would be dedicated to ten new classrooms, as well as restrooms and storage space.

The new and expanded lunch shelter (approximately 1,496 square feet) and circulation walkways/arcades would be accessed from the first floor. The new covered walkways would extend from and match the existing arcades. (See **Figure A-5**, *Proposed Classroom and Administration Building Site Views*, **Figure A-6**, *Proposed Classroom and Administration Building Floor Plan – First Floor*, and **Figure A-7**, *Proposed Classroom and Administration Building Floor Plan – Second Floor*.)

b. New Kindergarten Building

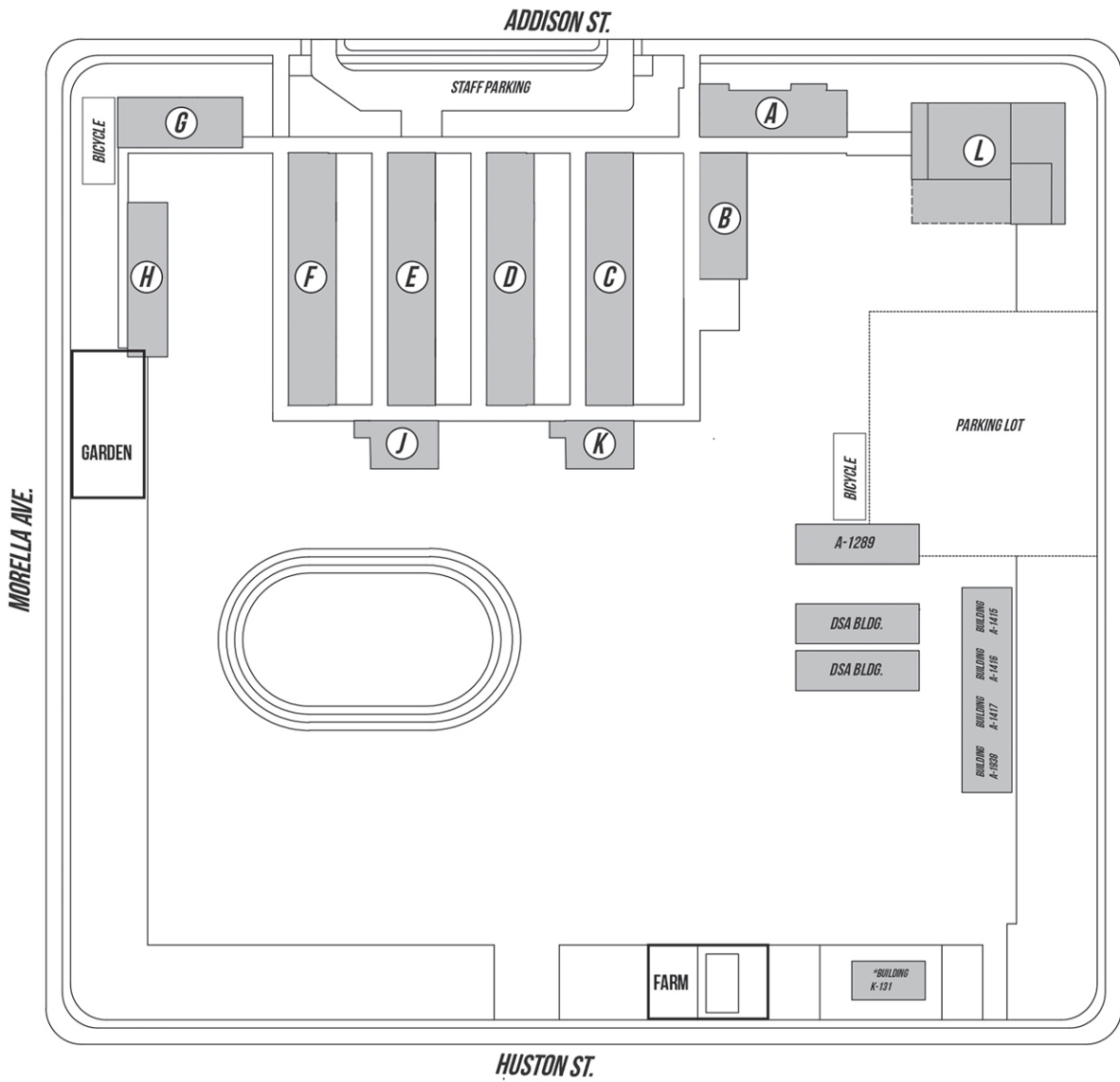
The new approximately 2,922 square-foot Kindergarten Building would be constructed to the south of the existing Kindergarten playground, adjacent to the existing Kindergarten classrooms. The new Kindergarten Building would be accessed from the entrance along Morella Avenue. Both classrooms would be accessed by a vestibule, where restrooms for faculty/staff and students would also be located. (See **Figure A-8**, *Proposed Kindergarten Building Rendering*, and **Figure A-9**, *Proposed Kindergarten Building Floor Plan*.) A new covered walkway/arcade will connect the Kindergarten Building to the main walkway/arcade structure by the main, permanent classroom buildings. In addition to the new Kindergarten Building, the Kindergarten playground would increase by approximately 1,932 square feet (see Table A-1).

c. Reuse of Existing Administration Building

The external appearance of the existing Administration Building, along Addison Street, would remain the same, while the interior of the structure would be reconfigured to accommodate a faculty/staff lounge, parent center, and two new meeting/resource rooms, as well as restrooms for faculty/staff. (See **Figure A-10**, *Repurposed Administration Building Floor Plan*.) The re-purposing and rehabilitation of the Administration Building would retain and restore the historic appearance of the primary (north and west) elevations, while inserting needed new openings on the secondary (south and east) elevations that are non-distinctive and not visible from the public right-of-way. The changes proposed to repurpose and rehabilitate the Administration Building would be differentiated due to the use of materials, but compatible in their design, scale and size. Specifically, the new doors and frames would be hollow metal thereby differentiated in materials from the original wood doors and frames, yet the new doors would be designed in the same style and would be similar to all of the contributing doors found throughout the Campus. The replacement and insertion of new doors would not detract from the original design of the Administration Building.

2. Access, Circulation and Parking

The main entrance for the school is currently located along Addison Street, with the Kindergarten entry located along Morella Avenue. The new main school entry will be along Colfax Avenue by the new Classroom and Administration Building, to the north of the new parking lot. The sidewalks along Addison Street, Colfax Avenue, and Morella Avenue are marked as “Passenger Loading Only,” with signage prohibiting parking during specified student pick-up/drop-off hours. The existing parking lot on Addison Street has 13 parking spaces, which will be reduced to 12 parking spaces as part of the project. Another parking lot is located along Colfax Avenue, adjacent to the portable classroom structures slated for removal and will be relocated south on the project site. This parking lot currently has 35 spaces and will be increased to provide 74 parking spaces. The new Classroom and Administration Building will be built at the location of the current Colfax parking lot. An additional 38 spaces will be developed as part of the project, for a total of 86 on-site spaces, which would reduce street parking in the surrounding neighborhood in association with current school use.

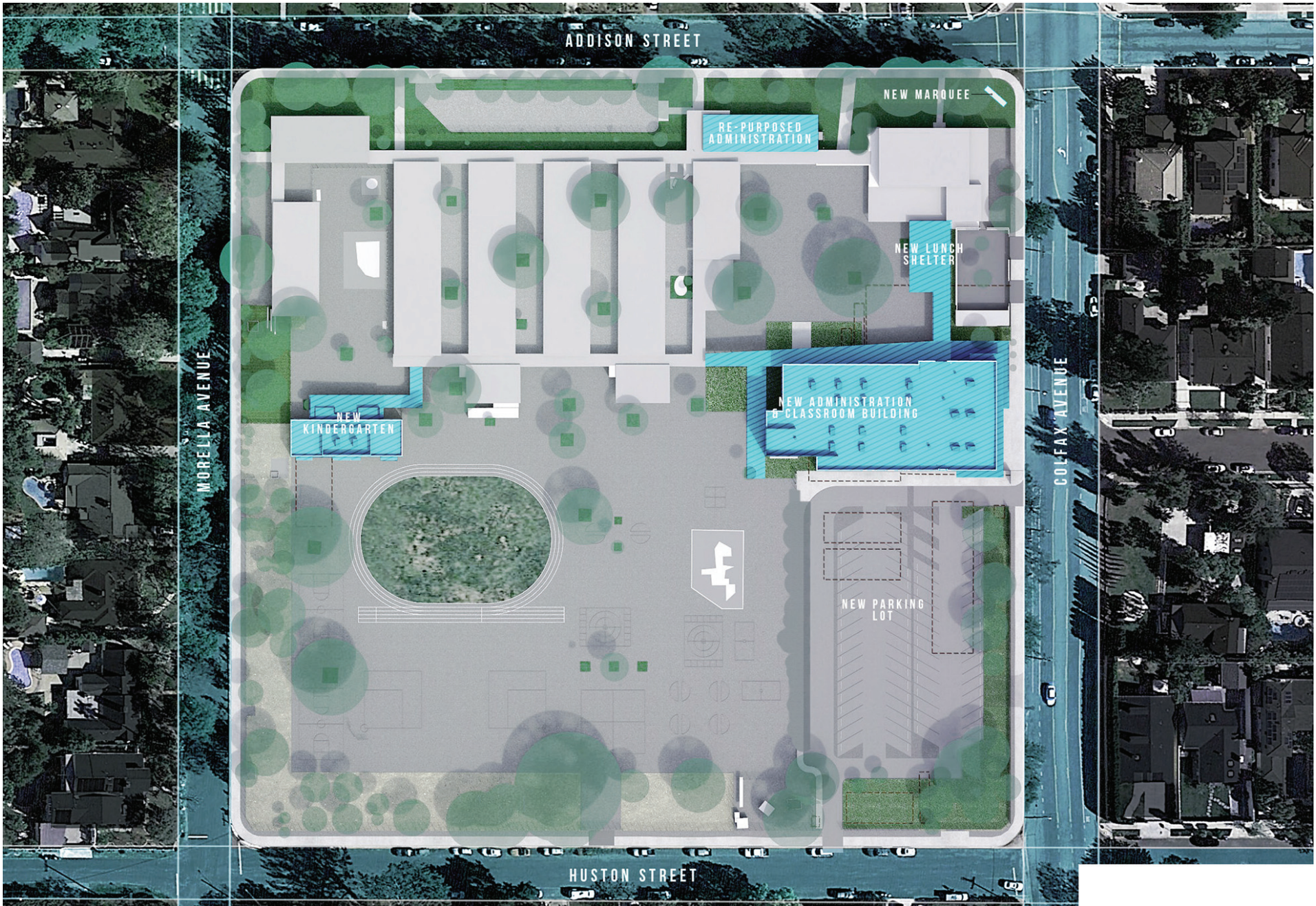


LEGEND

- (A)** ADMINISTRATION
- (B)** LIBRARY
- (C) (D) (E)** CLASSROOMS
- (F) (G)** SANITARY BLDGS.
- (J) (K)** KINDERGARTEN
- (H)** ASSEMBLY/CAFETERIA/MPR
- (L)** ASSEMBLY/CAFETERIA/MPR

* BUILDING K-131 LAUSD TRANSPORTATION





Proposed Site Plan

Colfax Charter Elementary School Classroom Addition Project

Source: AC Martin, 2016.

FIGURE

A-4



COLFAX ELEMENTARY SCHOOL ENTRANCE



EAST ELEVATION (SITE CONTEXT)



AERIAL VIEW FROM COLFAX FROM PARKING



AERIAL VIEW FROM ADDISON

Proposed Classroom and Administration Building Site Views

Colfax Charter Elementary School Classroom Addition Project
Source: AC Martin, 2016.

This page intentionally blank.

- Classrooms
- Lunch Shelter
- Administration
- Storage
- Elevator/Stairs
- Custodian
- Restrooms
- Circulation
- Electrical



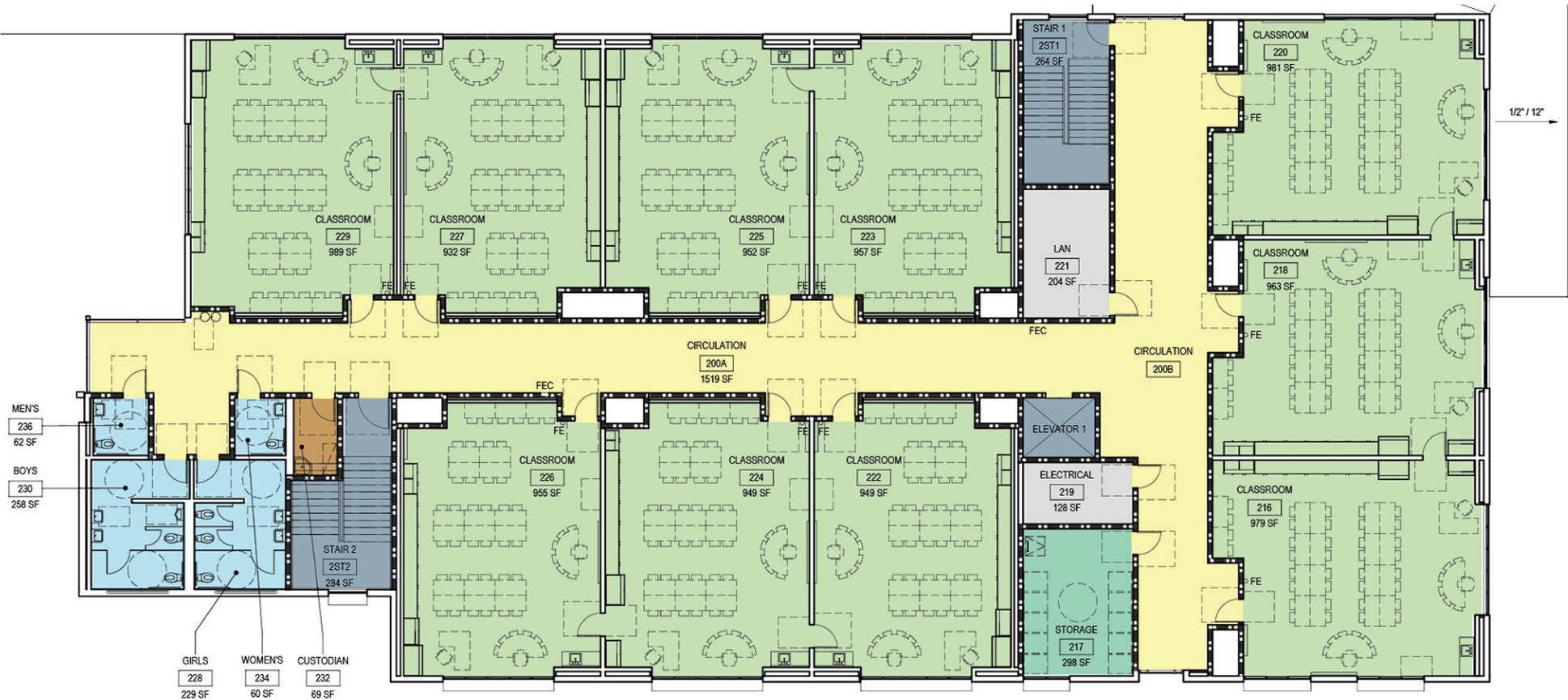
Proposed Classroom and Administration Building Floor Plan - First Floor

Colfax Charter Elementary School Classroom Addition Project
 Source: AC Martin, 2016.

FIGURE
A-6



- Classrooms
- Storage
- Elevator/Stairs
- Custodian
- Restrooms
- Circulation
- Electrical



Proposed Classroom and Administration Building Floor Plan - Second Floor

Colfax Charter Elementary School Classroom Addition Project

Source: AC Martin, 2016.

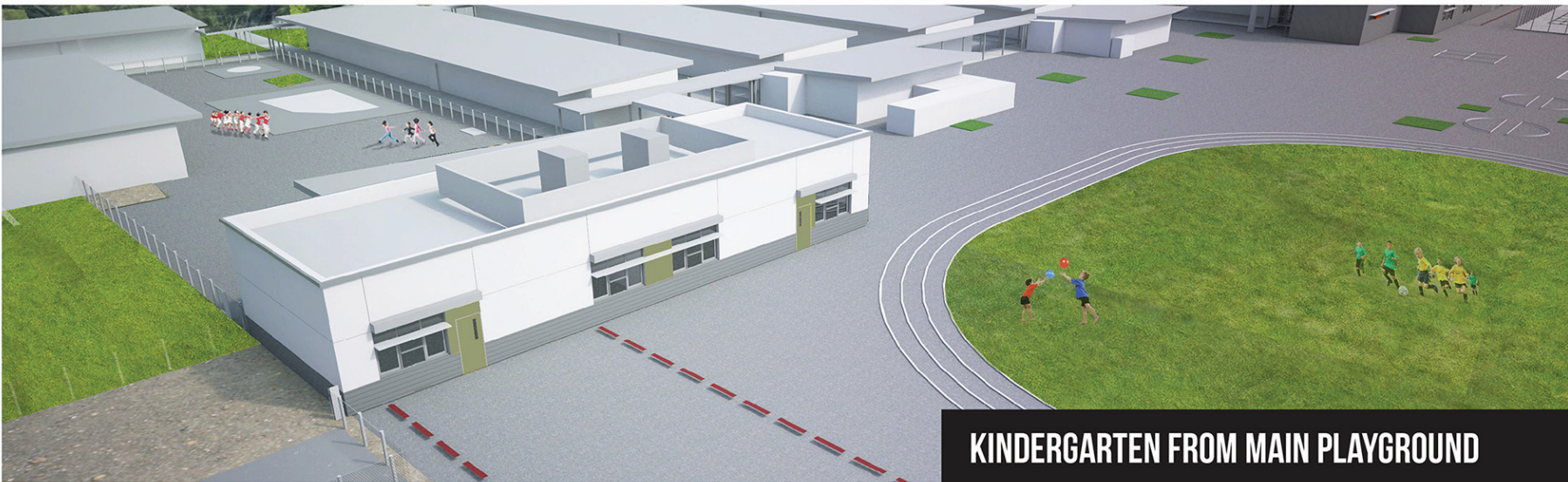
FIGURE

A-7



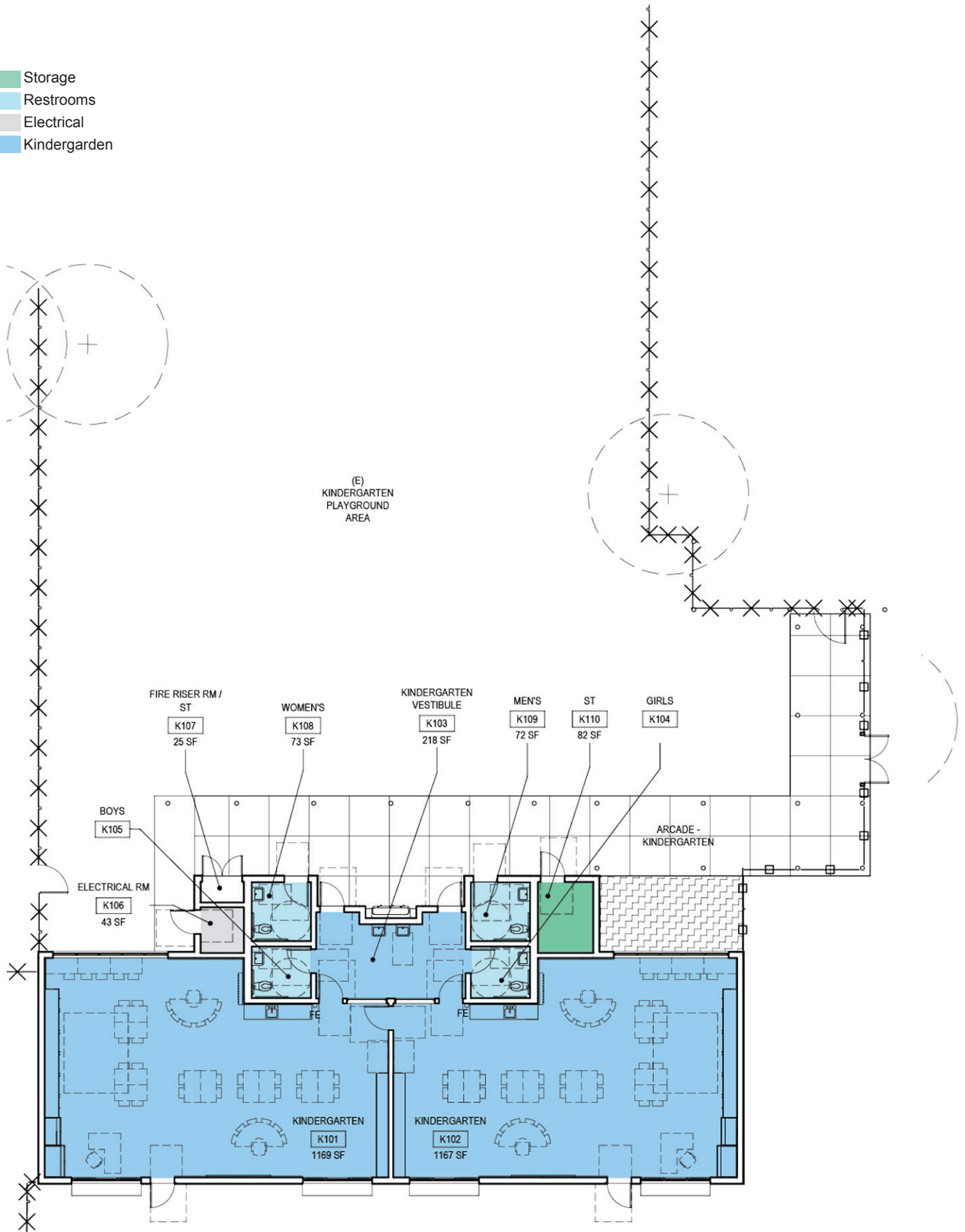


KINDERGARTEN FROM K-PLAYGROUND



KINDERGARTEN FROM MAIN PLAYGROUND

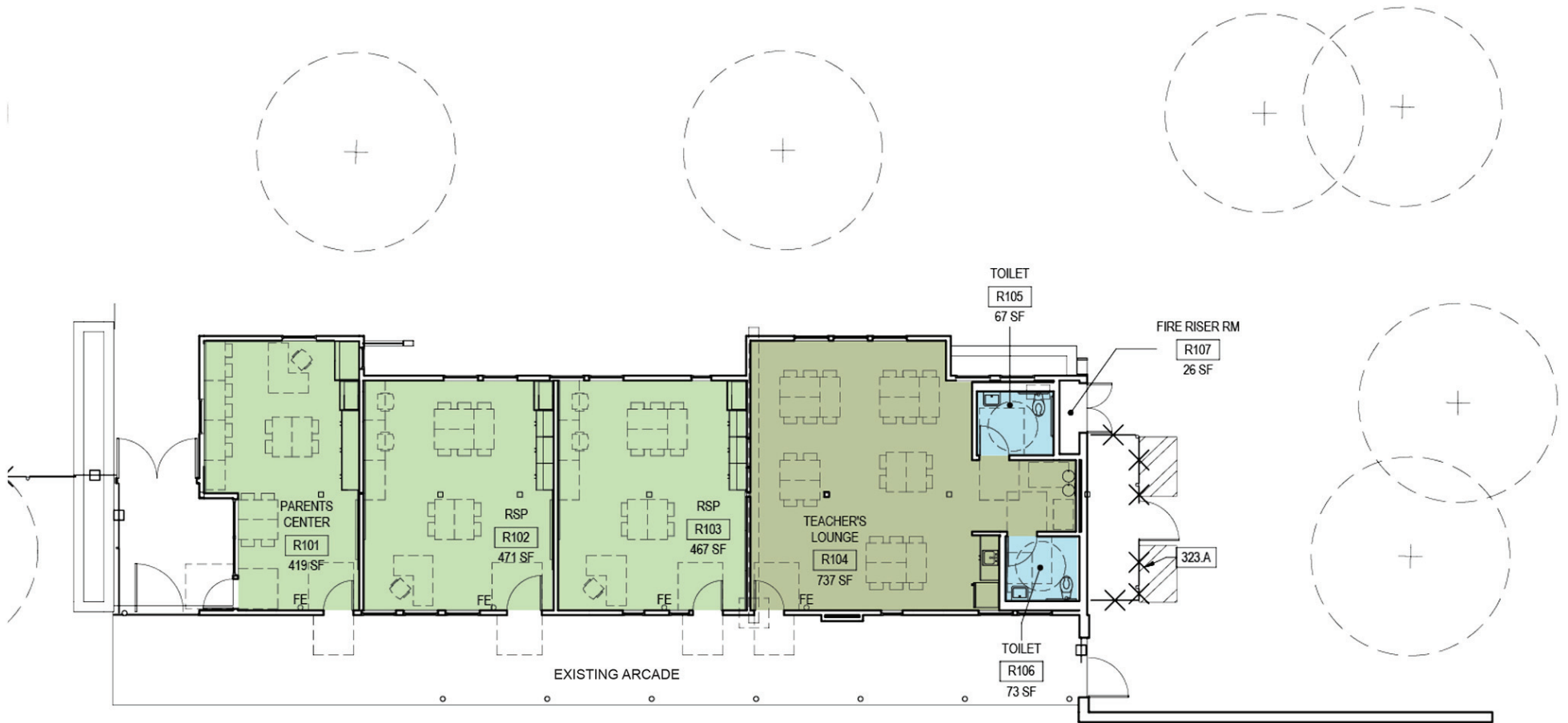
- Storage
- Restrooms
- Electrical
- Kindergarden



Proposed Kindergarten Building Floor Plan
 Colfax Charter Elementary School Classroom Addition Project
 Source: AC Martin, 2016.

FIGURE
A-9

- Classrooms
- Restrooms
- Teacher's Lounge



Repurposed Administration Building Floor Plan

Colfax Charter Elementary School Classroom Addition Project
Source: AC Martin, 2016.

FIGURE

A-10

Ingress to the new parking lot would only be from Colfax Avenue, and egress will only be permitted from Huston Street. As shown in **Figure A-11, *New Parking Lot Plan***, the 38 new parking spaces will be provided for faculty, staff and visitors. An internal student drop-off and pick up lane will be established within this new parking lot, allowing for a much safer drop-off than on the street. Students will be dropped off via a dedicated lane, while cars continuing through the lot will continue to use a second lane to exit on Huston Street. A total of 45 bicycle parking spaces will be located within the new parking lot. Currently, there is no student bus drop-off occurring at Colfax; however, should the need arise for a small bus (e.g., for disabled students) to access the site, the drop-off location would be along Addison Street.

During project construction, students in First through Fifth Grades would access the school from the existing Addison Street entrance. After project completion, the new primary school access for students and visitors would be on Colfax Avenue. Faculty and staff would be able to access the campus from the parking lots on Addison Street and Colfax Avenue. Kindergarten students would continue to access the campus from the existing Morella Avenue entrance.

3. Landscaping

Colfax has approximately 153 trees, including some that have been maintained since its days as an arboretum, particularly the larger specimens remaining around the perimeter of the school. The new landscape design will soften the appearance of the proposed new buildings while enhancing the overall campus appearance. The project's landscape design will complement and enhance the existing landscape features while blending the new architecture with the established buildings to best serve the needs of the students, faculty, staff, and the community. The primary goals of the new landscape design includes the creation of welcoming spaces that students, faculty and staff will want to use; providing clear paths of travel around the campus; and improving the outdoor play environment by adding trees and plants to the new parking lot perimeter and lunch area, providing shade and reducing the heat island effect from hot pavement.

The landscape plan would enhance the campus canopy by planting trees appropriate for their specific context with respect to buildings or other site features. Planting throughout the school will consist primarily of California native species, to achieve a balanced plant palette that will be water efficient while also meeting campus durability and maintenance requirements. The landscape plan incorporates all existing trees that are safe to remain given their current location and condition. Trees that will be retained will be protected during project construction through the use of temporary fencing, while trees that have been identified as a safety concern or are dead or diseased will be removed. The project would require removal of 40 trees, as well as the planters located along Colfax Avenue. Section IV, Biological Resources, of Attachment B of this MND includes a more detailed list of the trees to be removed. However, the loss of these trees and planters would be more than compensated for through planting of new trees and other landscaping features.

With regard to the campus hardscape plan, the new walkways/arcades would connect to new and existing buildings and corridors, and paving would be scored to match the existing paving pattern. New tree wells would be installed into the existing pavement, and planters would be contained within raised curbs to provide protection for planted materials. Wood benches would be created by repurposing and reusing the trees on site that would be removed due to project implementation. These unique, solid wood benches would be cut to size, sanded and treated for durability, then attached to weather resistant metal legs.

A new "Smart Weather" controller would be installed to replace the existing, inefficient irrigation system, which currently covers approximately 20 percent of the school. The new irrigation system would be

adjustable, to minimize overspray on buildings and paving. All trees will be irrigated using a root watering bubbler system to encourage deep root growth, and all planting areas would use efficient pop-up sprayers. The landscape plan would include a biofiltration system to capture and treat stormwater runoff from the school site. The runoff will primarily be directed to an underground sump that would not affect the planting areas. Mulch or groundcover used on the site will be derived from recycled content.

4. Site Security and Safety

Most of the campus perimeter is surrounded by eight-foot-high chain-link security fencing. A majority of the chain link fence along the new school entrance at Colfax Avenue and the Kindergarten entrance along Morella Avenue will be replaced with new decorative perimeter fencing. The ornamental screen fence would consist of perforated ornamental metal, with images of children and trees.

For security purposes, the new main entrance gate will include upgraded security fencing. There will be electronic access control at school entrances and parking lots. The project site would have safe dispersal/evacuation areas, and all new structures would be equipped with fire suppression sprinkler systems.

The perimeter of the proposed new Kindergarten Building and Classroom and Administration Building would have new light fixtures attached to the exterior walls. All entries would be illuminated to provide safe access. The new parking lot would also have security lighting on poles. The security lighting would be focused and shielded to reduce glare and light spill-over. Project design features would be incorporated to ensure that these new sources would not create light spill-over greater than 2-foot candles onto adjacent residences. Furthermore, site lighting would be designed to have minimal off-site impact and contribution to sky glow. Outdoor lighting of architectural and landscape features and interior lighting would be designed to minimize light trespass to the outside from the interior.

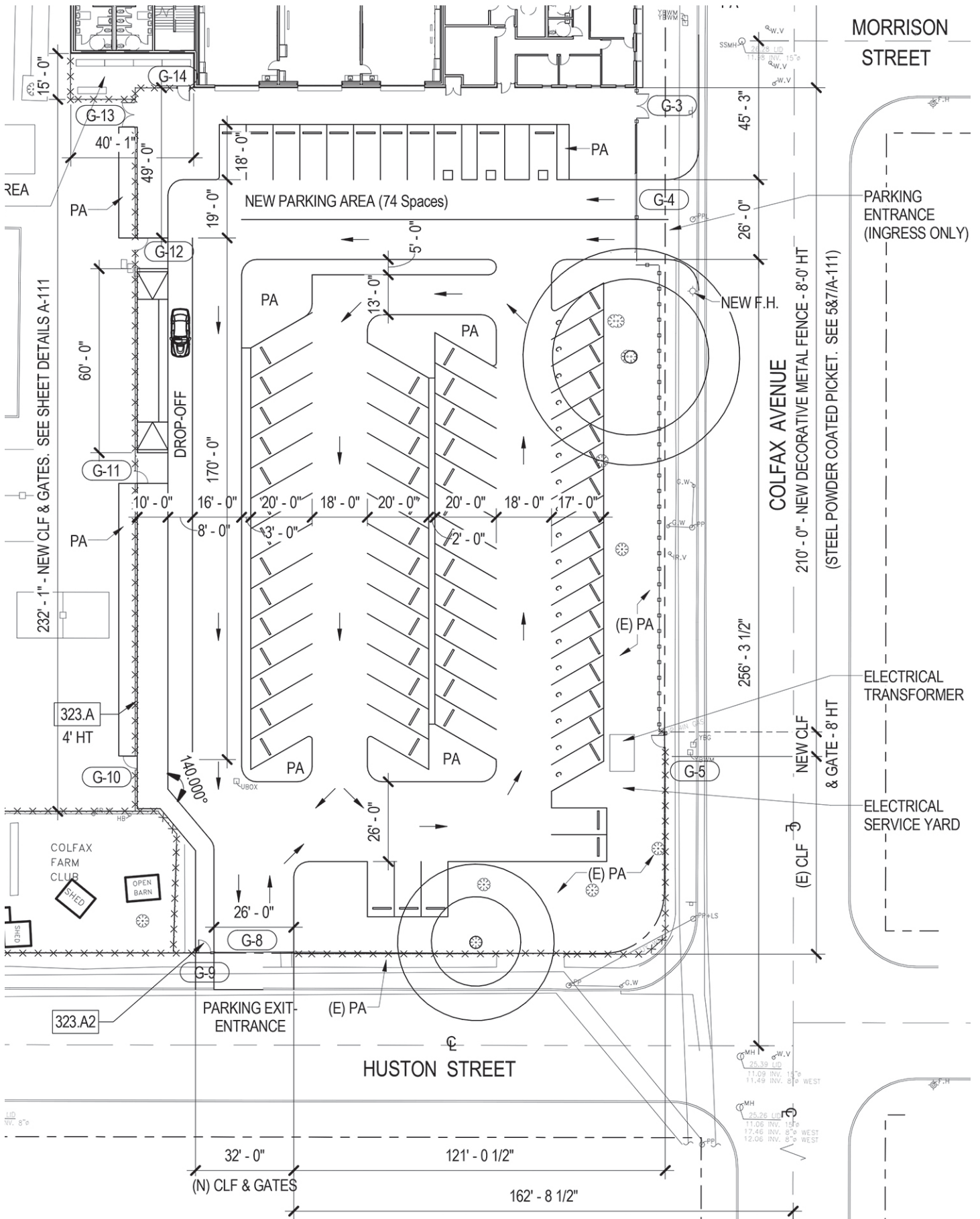
5. Sustainability Features

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.¹⁴

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 include easy access to public transportation, the provision of bicycle racks, on-site 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.¹⁵

¹⁴ Collaborative for High Performance Schools, *What is a High Performance School?* Website: <http://www.chps.net/dev/Drupal/node/166>. Accessed May 2016.

¹⁵ AC Martin Architecture, *Design Development Design Report, Los Angeles Unified School District Colfax Charter Elementary School Classroom Addition Project*, April 25, 2016.



New Parking Lot Plan
 Colfax Charter Elementary School Classroom Addition Project
 Source: AC Martin, 2016.

FIGURE
A-11

6. Construction Characteristics

As a part of the project, a net cut of approximately 1,000 cubic yards of soil would be excavated and hauled from the project site. This would require approximately 14 trucks, each with a capacity of fourteen cubic yards and three truck trips a day to remove the soil. Excavation could reach a depth of approximately eight feet to access sanitary sewer utilities. Some stockpiles would be placed onsite temporarily during project excavation, and covered with tarps and/or watered to prevent dust. Haul routes for trucks would be directly from Colfax Avenue and Addison Street, as the new construction areas are immediately adjacent to these streets, as well as the fire lane access/service road. Approximately 40 to 50 construction workers would be onsite for the duration of the project. The typical construction work day would be eight hours per day, from approximately 7:00 a.m. to 3:00 p.m., five days per week.

During project construction, worker access to the new Classroom and Administration Building area would be from a temporary construction access gate along Colfax Avenue. Construction access to the new Kindergarten Building area would be via a temporary construction access gate located along Morella Avenue. Other temporary construction access gates would be located at Addison Street, by the current main entrance of the school, and at Huston Street, by the current Transportation Office trailer.

The main construction staging and construction worker parking area will be located in the southeast portion of the school, where the new parking lot would be located. Other smaller staging areas are located farther to the north along Colfax Avenue, by the Multi-Purpose Building, and along Morella Avenue, south of the new Kindergarten Building area.

Construction activities will take place during school operation. The areas surrounding the new Classroom and Administration Building and Kindergarten Building would be separately secured and gated to avoid safety concerns and interaction with students. Fire access, which is currently off of Huston Street, will remain at that location during construction.

7. Construction Schedule

Construction of the proposed project would begin in late 2018 and is anticipated for completion in 2021, for a duration of approximately 30 months.

E. NECESSARY APPROVALS

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

- LAUSD Adoption of a Mitigated Negative Declaration;
- LAUSD Adoption of a Mitigation Monitoring and Reporting Program;
- Grading, excavation, foundation, and associated building permits;
- Division of State Architect;
- Los Angeles Fire Department; and
- Other permits and approvals as deemed necessary.

ATTACHMENT B

EXPLANATION OF CHECKLIST DETERMINATIONS

ATTACHMENT B: EXPLANATION OF CHECKLIST DETERMINATIONS

I. AESTHETICS

Would the project:

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

Less Than Significant 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 in Valley Village, in central San Fernando Valley, which is defined by broad, flat valleys developed with suburban land uses and framed by the geographic features of the Angeles National Forest. The steep, undeveloped hillsides and peaks of the Angeles National Forest comprise the dominant geographical features and visual resources of merit in the project vicinity. Further, panoramic views into the central San Fernando Valley to the southwest are afforded from sloped hillsides in the general area.

Public views that incorporate the project site are available from the surface streets surrounding the Colfax Charter Elementary School, including Addison Street, Morella Avenue, Huston Street and Colfax Avenue. In general, views from these streets are of the built environment adjacent to the roadways; however, distant views of the area's topography (i.e., the undeveloped hillsides and peaks) are available above the built environment. The elevation change along these roadways is not great enough to afford panoramic views of the central San Fernando Valley. Private views in the project vicinity, including the residential, school and park uses, are similar to public views, but are more restricted by landscaping and existing structures.

Colfax Charter Elementary School was found eligible as a historic district under the California Register Criterion 1, as an excellent example of Mid-Century Modern style applied to institutional architecture, reflecting the rapid postwar suburban expansion of the San Fernando Valley, as defined in the Los Angeles Unified School District (LAUSD) Historic Context Statement.^{1,2} Colfax Charter Elementary School was assigned a California Historical Resource status code of 3CD, "appears eligible for the California Register as a contributor to a California Register eligible district through survey evaluation," but the campus was not found eligible for the National Register of Historic Places. Significant features include the finger plan school, with its shared courtyards, the covered arcade/walkway connecting the north and south elevations (oriented east-west), the landscape and open space fronting Addison Street, and the mature trees lining the perimeter of the school site.³ As such, the defined portions of the Colfax campus are considered an historical resource as defined by the California Environmental Quality Act (CEQA).

The LAUSD School Upgrade Program (SUP) Final Environmental Impact Report (EIR: "Program EIR") identifies select scenic vistas and aesthetic features within the District, including the Angeles National Forest,

¹ *Sapphos Environmental, Inc., Los Angeles Unified School District: Historic Context Statement, 1870 to 1969 (March 2014).*

² *Sapphos Environmental, Inc., Debi Howell-Ardila, MHP, DPR Form: Colfax Avenue Elementary School, Prepared for LAUSD (January 24, 2014).*

³ *PCR Services Corporation, Character-Defining Features Memorandum (CDFM) for Colfax Avenue Elementary School, 11724 Addison Street, North Hollywood, California 91607 (May 11, 2016).*

located approximately 15 miles northeast of Colfax Charter Elementary School, across the Foothill Freeway (Interstate 210).⁴ The project would remove ten portable classrooms and construct 18 new classrooms. The proposed two-story Classroom and Administration Building would not represent a notable departure in terms of views into and across the project site. With implementation of the project, views of the Angeles National Forest from public and private vantage points would essentially be the same as with current conditions. The vistas available from the campus would not be affected by new classroom structures and two-story Classroom and Administration Building, as it will be built on an existing school campus and be of a similar height as the other structures on campus. Public views from the areas around the project site would also remain substantially similar to current conditions.

The Program EIR states that impacts to scenic vistas with respect to all SUP projects would be less than significant, as the District is required to incorporate the LAUSD School Design Guide into the site design and construction for protection of unique scenic features and designated scenic vistas.⁵ The project would not significantly impact views of the Angeles National Forest or other surrounding scenic vistas, as it would occupy roughly the same visual field as the current conditions. Therefore, project impacts would be considered less than significant. No mitigation measures or further evaluation are required.

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

Less Than Significant Impact. The project is not located within a State-designated scenic highway.⁶ Scenic resources from within State Route 2 (SR-2), which is the closest State-designated scenic highway, would not be impacted by implementation of the project, nor would the project be visible from SR-2, as it is located over 12 miles northeast of the project site. The closest City of Los Angeles-designated scenic highway to the project site is the Ventura Freeway (US-101), which is located approximately five miles west of the project site.⁷ Scenic resources from within the scenic highway would not be significantly impacted by the project, as the construction and operation of the proposed project would not materially alter the view of scenic resources from the Ventura Freeway. As the project would be built on an existing school campus at essentially the same location, there would be no real change in views from either direction of the Ventura Freeway, as the project site is not visible to drivers at this distance. Furthermore, views of the Angeles National Forest are situated to the north of the Foothill Freeway, not facing southwards to the project site.

The Program EIR states that impacts to scenic vistas with respect to all SUP projects would be less than significant, as the District is required to incorporate the LAUSD School Design Guide into the site design and construction for protection of scenic resources.⁸ Therefore, project impacts would be considered less than significant. No mitigation measures or further evaluation are required.

⁴ LAUSD School Upgrade Program Final Environmental Impact Report, September 2015, page 5.1-11, Table 5.1-2, Select Scenic Vistas and Aesthetic Features.

⁵ *Ibid*, at pages 5.1-13 and 5.1-14.

⁶ California Department of Transportation, California State Scenic Highway Mapping System, Los Angeles County. Website: http://www.dot.ca.gov/hq/LandArch/16_livability/scenic_highways/index.htm. Accessed May 2016.

⁷ City of Los Angeles General Plan Transportation Element, Map E, Scenic Highways in the City of Los Angeles. Website: http://planning.lacity.org/cwd/gnlpln/transelt/TEMaps/E_Scnc.gif. Accessed May 2016.

⁸ LAUSD School Upgrade Program Final Environmental Impact Report, September 2015, at pages 5.1-14 and 5.1-15.

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

Less Than Significant Impact With Mitigation Incorporated. Implementation of the project would not degrade the existing visual character of the site. The purpose of the project would be to improve the current condition of the campus with new and modernized buildings, internal circulation improvements, and new parking facilities. The existing one-story buildings on campus are simple, rectilinear wood frame structures with painted stucco exterior finish. Strong horizontal lines of trim mark a continuous definition of roof edges. The new classroom buildings and walkways will incorporate the strong horizontal elements of the existing buildings. Paint color will also complement the existing light beige found on campus. The dark brown lapped cement fiber board will establish a new base at the new buildings and will relate to the residential architecture of the homes in the surrounding neighborhood. The new covered walkways will extend to match the existing arcades. The massing of the buildings would reflect the residential scale of the surrounding neighborhood.⁹ Implementation of the project would not represent degradation in visual character of the surrounding community.

During project construction, there would be elements temporarily on the project site that may not be aesthetically compatible with the project vicinity or the campus. These features may include construction equipment (e.g., small cranes, pickup trucks), stockpiled materials, and construction-area barriers and fencing. Construction elements would be inconsistent with the visual character of the project vicinity. While these elements would be removed following construction, they would nonetheless result in a temporary impact. However, during project construction, work areas would be screened from public view and from the students of Colfax Charter Elementary School through the use of temporary barriers.

The new and repurposed classroom buildings would be fully integrated with Colfax Charter Elementary School in terms of scale, materials, and landscaping. Furthermore, LAUSD adheres to a variety of design standards that apply to the project, which would ensure that such projects are aesthetically compatible with the neighborhood in which they are located. The design standards include the incorporation of a set of Best Management Practices (BMPs) during design, construction, and operation.

The Program EIR states that impacts to scenic vistas with respect to all SUP projects would be less than significant, as the District is required to incorporate measures from the LAUSD School Design Guide and LAUSD Standard Condition (SC) AE-3 into site-specific project design for the protection of character and quality of site surroundings.^{10,11}

SC-AE-3: LAUSD shall assess a proposed project's consistency with the general character of the surrounding neighborhood, including any proposed changes to the density, height, bulk, and setback of a new building (including stadium), addition, or renovation. Where feasible, LAUSD shall make appropriate design changes to reduce or eliminate viewshed obstruction and degradation of neighborhood character. Such design changes could include, but are not limited to, changes to campus layout, height of buildings, landscaping, and/or the architectural style of buildings.

⁹ LAUSD Colfax Charter Elementary School Classroom Addition Project, Design Development Design Report, April 25, 2016, at pages 1 and 2.

¹⁰ LAUSD School Upgrade Program Final Environmental Impact Report, September 2015, at pages 5.1-15 to 5.1-16.

¹¹ Ibid, at page 5.1-7.

Shadow-sensitive uses include all residential uses and routinely usable outdoor spaces associated with recreational or institutional uses (e.g., schools), commercial uses such as pedestrian-oriented outdoor spaces or restaurants with outdoor eating areas, nurseries, and existing solar collectors. These uses are considered sensitive because sunlight is important to function, physical comfort, or commerce. Shade sensitive uses in the project vicinity are limited to the residential uses adjacent to the southern, western and northern site boundaries. Impacts from shadows would be virtually the same as current conditions, as the new Kindergarten Building would be one story in height and would not cause shadows to extend off-site in such a manner as to significantly impact nearby sensitive residential uses. Similarly, due to its proposed location, the new Classroom and Administration Building would not have shadows casting onto residential uses to the north. There would be no new shade impacts to sensitive uses on the northern side of the site, across from the existing main entrance. No significant impacts from shadows would occur as a result of the project.

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

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

Less Than Significant Impact With Mitigation Incorporated. The project site is located in Valley Village, which is an urban/suburban area characterized by low to medium nighttime ambient light levels. Artificial lighting is currently utilized on campus and in the surrounding area for security, parking, signage, architectural highlighting, and landscaping/decorative purposes. Street lights and traffic on local streets also contribute to the ambient light levels in the area. In addition, athletic fields at North Hollywood Recreation Center are illuminated during the night time for games. Light sensitive uses in the project vicinity are limited to surrounding residences.

The perimeter of the proposed new Kindergarten Building and Classroom and Administration Building would have new light fixtures attached to the exterior walls. All entries would be illuminated to provide safe access. The new parking lot would also have security lighting on poles, that would be focused and shielded to reduce glare and light spill-over. A new electronic marquee would be located near the intersection of Addison Street and Colfax Avenue, replacing the existing marquee. The new double-sided marquee would be 6-foot wide by 4-foot tall and mounted to a structural leg. Internal illumination will be achieved with zero degree fluorescent lamps and ballasts. The new marquee would be designed in accordance with SC AE-4, LAUSD Marquee Sign Bulletin BUL-5004.1. Project design features would be incorporated to ensure that these new sources would not create light spill-over greater than 2-foot candles onto adjacent residences. Furthermore, site lighting would be designed to have minimal off-site impact and contribution to sky glow. Outdoor lighting of architectural and landscape features and interior lighting would be designed to minimize light trespass to the outside from the interior. The project's proposed landscaping, parking and security lighting is expected to contribute to ambient nighttime illumination in the project vicinity. However, LAUSD SCs would be included to reduce the potential for light spillover to adjacent properties.

With respect to all SUP projects, the Program EIR states that light and glare impacts would be less than significant with implementation of the required measures from the LAUSD School Design Guide and SCs AE-4, AE-6, AE-7 and AE-8 to ensure that site lighting would have minimal off-site impacts.^{12,13}

- SC-AE-4: Marquee Sign Bulletin BUL-5004.1.** This policy provides guidance for the procurement and installation of marquee signs (outdoor sign with electronic message display) on District campuses. The policy includes requirements for the design, approval, placement, operation, and maintenance of electronic school marquees erected and operated at LAUSD schools. The policy also includes measures to mitigate light and glare, such as the use of “luminaries” in connection with school construction.
- SC-AE-6: School Design Guide.** This document outlines requirements for lighting and measurements to minimize glare for pedestrians, drivers and sports teams, and to avoid light spilling onto adjacent properties.
- SC-AE-7:** LAUSD shall reduce the lighting intensity from the new sources on adjacent residences to no more than two foot-candles, measured at the residential property line. LAUSD shall utilize hoods, filtering louvers, glare shields, and/or landscaping as necessary to achieve the standard. The lamp enclosures and poles shall also be painted to reduce reflection. Following installation of lights, the lighting contractor shall review and adjust lights to ensure the standard is met.
- SC-AE-8:** Design site lighting and select lighting styles and technologies to have minimal impact off-site 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.

International Dark-Sky Association (IDA) and the Illuminating Engineering Society (IES) Model Lighting Ordinance (MLO) shall be used as a guide for environmentally responsible outdoor lighting. The MLO 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:

- Limit the amount of light that can be used
- Minimize glare by controlling the amount of light that tends to create glare
- Minimize sky glow by controlling the amount of uplight
- Minimize the amount of off-site impacts or light trespass

¹² *Ibid*, at page 5.1-16.

¹³ *Ibid*, at pages 5.1-7 and 5.1-8.

With implementation of SCs AE-4, AE-6, AE-7 and AE-8, impacts with respect to light and glare would be less than significant. No mitigation measures or further evaluation are required.

II. AGRICULTURE AND FOREST RESOURCES

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

Would the project:

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

No Impact. There is no Farmland of Statewide Importance in the District, and there are no areas of Prime Farmland or Unique Farmland on or nearby Colfax Charter Elementary School.¹⁴ With respect to new construction and modernization on existing campuses, the Program EIR states that impacts to Farmland would be less than significant, as some other LAUSD school campuses are located close to Farmland and indirect impacts may result.

The project would be constructed on the existing Colfax Charter Elementary School Campus, and no agricultural uses or related operations are present within the project site or in the surrounding suburban area. As such, the project site is not located on designated Prime Farmland, Unique Farmland, or Farmland of Statewide Importance as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program.¹⁵ Since the project would not convert farmland to non-agricultural uses, there would be no impact. No mitigation measures or further evaluation are required.

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

No Impact. The project site is currently zoned as Public Facilities (PF-1VL), and the General Plan land use designation is also Public Facilities. As such, the project would not conflict with existing zoning for agricultural use or a Williamson Act contract. The Program EIR states that no farmland security zone or Williamson Act contracts are in effect for land within the District.¹⁶ Therefore, any project constructed under

¹⁴ *Ibid*, at page 5.2-10 to page 5.2-11.

¹⁵ *California Department of Conservation, Division of Land Resource Protection, Farmland Mapping and Monitoring Program, Los Angeles County Important Farmland Map 2010 and Los Angeles County Williamson Act Map 2011-2012.*

¹⁶ *LAUSD School Upgrade Program Final Environmental Impact Report, September 2015, pages 5.2-11 and 5.2-12.*

the SUP would not conflict with farmland preservation under a Williamson Act contract. No mitigation measures or further evaluation are 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 project site is zoned as Public Facilities (PF-1VL). No forest land or timberland zoning is present on the site or in the surrounding area. As such, the project would not conflict with existing zoning for forest land or timber land, and there would be no impact. No mitigation measures or further evaluation are required.

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

No Impact. The project site is an existing school campus, and no forest land exists on or adjacent to the project site. As such, the project would not result in the loss of forest land or conversion of forest land to non-forest use, and there would be no impact. No mitigation measures or further evaluation are 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. There are no agricultural uses or related operations or forest land on or near the project site. Therefore, the project would not involve the conversion of farmland or forest land to other uses, either directly or indirectly. No impacts to agricultural or forest land uses would occur. No mitigation measures or further evaluation are required.

III. AIR QUALITY

Where available, the significance criteria established by the applicable air quality management or air pollution control district has been relied upon to make the following determinations.

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 6,745 square mile South Coast Air Basin (SoCAB). The South Coast Air Quality Management District (SCAQMD) is required, pursuant to the Clean Air Act, to reduce emissions of criteria pollutants for which the Basin is in non-attainment (i.e., ozone, PM₁₀, and PM_{2.5}). 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. These strategies are developed, in part, based on regional

population, housing and employment projections prepared by the Southern California Association of Governments (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.¹⁷

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 proposed project would increase enrollment at the school by up to 160 students as a result of its implementation. However, the project would be consistent with the growth projections in the AQMP. In addition, as further discussed below, implementation of the proposed project would not exceed any ambient air quality standards or thresholds. Therefore, the proposed project would not be anticipated to conflict with or obstruct implementation of the SCAQMD's AQMP.

The Congestion Management Program (CMP) was enacted by the Los Angeles County Metropolitan Transportation Authority (Metro) to address traffic congestion issues that could impact quality of life and economic vitality. The intent of the program is to provide an analytical basis for transportation decisions throughout the state. An analysis is required at all CMP monitoring intersections for which a project is projected to add 50 or more trips during any peak hour. In addition, analysis is required for all freeway segments for which a project is projected to add 150 or more hourly trips, in each direction, during the peak hours analyzed.

Operation of the proposed project would result in a net increase in trips compared to existing conditions (refer to Response to Checklist Question XVII.b). In addition, project construction would intermittently require up to 40 or 50 workers on-site and a maximum of 18 haul trucks per day.¹⁸ Furthermore, LAUSD SCs encourage construction hauling to occur during off-peak commuter travel times.¹⁹ As a result, the proposed project would not exceed any CMP thresholds, and no impact to the CMP network or conflicts with or obstruction to its implementation would occur.

The Program EIR states that consistency with the applicable AQMP is required for all SUP projects, including the proposed project, as the District is required to incorporate the LAUSD School Design Guide into the site design and construction.²⁰ Therefore, implementation of the proposed project would not conflict with or obstruct implementation of the AQMP or CMP, and project-related impacts would be less than significant. No mitigation measures or further evaluation are required.

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

Less Than Significant Impact With Mitigation Incorporated. As indicated above, the project site is located within the SoCAB, which is characterized by relatively poor air quality. State and federal air quality standards are often exceeded in many parts of the SoCAB, including those monitoring stations nearest to the

¹⁷ SCAG serves as the federally designated metropolitan planning organization (MPO) for the southern California region.

¹⁸ As provided in Appendix A, during the grading phase, total haul truck trips are estimated to be approximately 970 round trips over 54 days, which is equivalent to approximately 18 haul trips per day.

¹⁹ LAUSD School Upgrade Program Final Environmental Impact Report, September 2015, SC-T-4, at pages 5.17-6.

²⁰ *Ibid*, at page 5.3-27.

project location. Construction activities associated with the SUP, including the proposed project, would contribute to local and regional air pollutant emissions during construction (short-term).²¹ However, based on the following analysis, construction and operation of the proposed 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 Impacts

Construction has the potential to create regional air quality impacts through the use of heavy-duty construction equipment and through vehicle trips generated by construction workers traveling to and from the project site. In addition, fugitive dust emissions would result from demolition, site preparation, and construction activities. Mobile source emissions, primarily particulate matter (P.M.) and nitrogen oxides (NO_x) would result from the use of construction equipment such as bulldozers, loaders, and haul trucks. During the finishing phase, paving operations and the application of architectural coatings (i.e., paints) and other building materials would release volatile organic compounds (VOCs). Construction emissions can vary substantially from day to day, depending on the level of activity, specific type of operation, dust, and the prevailing weather conditions.

Regional construction-related emissions associated with heavy construction equipment were calculated using the California Emissions Estimator Model (CalEEMod) emissions inventory model originally developed by the SCAQMD, accounting for the above listed mandatory control measures. Model results are provided in Appendix A of this document. The analysis assumed that all construction activities will comply with SCAQMD Rule 403 regarding the control of fugitive dust. A summary of maximum daily regional emissions by construction phase is presented in **Table B-1, Unmitigated Regional Construction Emissions**, along with the regional significance thresholds for each air pollutant. As shown therein, maximum regional construction emissions would not exceed the thresholds for VOC, NO_x, carbon monoxide (CO), sulfur dioxide (SO_x), PM₁₀, or PM_{2.5}.

The proposed project will include limited grading and construction activities and, therefore, may result in fugitive dust emissions. As described in the Program EIR, implementation of the SUP would be consistent with plans adopted for the purpose of reducing criteria pollutant emissions, such as California Green Building Code (Title 24), SCAQMD Rule 403, and other statewide strategies to reduce criteria pollutant emissions.²² All exposed soil shall be wetted at least twice daily during excavation and construction, and temporary dust covers shall be used to reduce dust emissions by up to 50 percent and meet SCAQMD District Rule 403.

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 will implement SCs-AQ-2 and AQ-4 to ensure that construction emissions would have minimal off-site impacts.^{23,24}

²¹ *Ibid*, at pages 5.3-27 and 5.3-28.

²² *Ibid*, at pages 5.3-34 to 5.3-35.

²³ *Ibid*, at pages 5.3-27 and 5.3-28.

²⁴ *Ibid*, at pages 5.3-12.

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-4: LAUSD shall prepare an air quality assessment. If site-specific review of a school construction project identifies potentially significant adverse regional and localized construction air quality impacts, then LAUSD shall implement all feasible measures to reduce air emissions below the South Coast Air Quality Management District's (SCAQMD) regional and localized significance thresholds.

LAUSD shall mandate that construction bid contracts include measures identified in the air quality assessment. Measures shall reduce construction emissions during high-emission construction phases from vehicles and other fuel driven construction engines, activities that generate fugitive dust, and surface coating operations. Specific air emission reduction measures include, but are not limited to, the following:

Exhaust Emissions

- Schedule construction activities that affect traffic flow to off-peak hours (e.g. between 10:00 AM and 3:00 PM).
- Consolidate truck deliveries and/or limit the number of haul trips per day.
- Route construction trucks off congested streets.
- Employ high pressure fuel injection systems or engine timing retardation.
- Utilize ultra-low sulfur diesel fuel, containing 15 ppm sulfur or less (ULSD) in all diesel construction equipment.
- Use construction equipment rated by the United States Environmental Protection Agency as having Tier 3 (model year 2006 or newer) or Tier 4 (model year 2008 or newer) emission limits for engines between 50 and 750 horsepower.
- Restrict non-essential diesel engine idle time, to not more than five consecutive minutes.
- Utilize electrical power rather than internal combustion engine power generators as soon as feasible during construction.
- Utilize electric or alternatively fueled equipment, if feasible.
- Utilize construction equipment with the minimum practical engine size.
- Utilize low-emission on-road construction fleet vehicles.
- Ensure construction equipment is properly serviced and maintained to the manufacturer's standards.

Fugitive Dust

- Apply non-toxic soil stabilizers according to manufacturers' specification to all inactive construction areas (previously graded areas inactive for ten days or more).
- Replace ground cover in disturbed areas as quickly as possible.
- Sweep streets at the end of the day if visible soil material is carried onto adjacent public paved roads (recommend water sweepers with reclaimed water).

- Install wheel washers where vehicles enter and exit unpaved roads onto paved roads, or wash off trucks and any equipment leaving the site each trip.
- Pave construction roads that have a traffic volume of more than 50 daily trips by construction equipment, and/or 150 daily trips for all vehicles.
- Pave all construction access roads for at least 100 feet from the main road to the project site.
- Water the disturbed areas of the active construction site at least three times a day, except during periods of rainfall.
- Enclose, cover, water twice daily, or apply non-toxic soil binders according to manufacturers' specifications to exposed piles (i.e., gravel, dirt, and sand) with a five percent or greater silt content.
- Suspend all excavating and grading operations when wind speeds (as instantaneous gusts) exceed 25 miles per hour (mph).
- Apply water at least three times daily, except during periods of rainfall, to all unpaved road surfaces.
- Limit traffic speeds on unpaved roads to 15 mph or less.
- Prohibit high emission causing fugitive dust activities on days where violations of the ambient air quality standard have been forecast by SCAQMD.
- Tarp and/or maintain a minimum of 24 inches of freeboard on trucks hauling dirt, sand, soil, or other loose materials.
- Limit the amount of daily soil and/or demolition debris loaded and hauled per day.

General Construction

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

Table B-1

Unmitigated Regional Construction Emissions^a
(pounds per day)

	<u>VOC</u>	<u>NO_x</u>	<u>CO</u>	<u>SO₂</u>	<u>PM₁₀^b</u>	<u>PM_{2.5}^b</u>
Maximum Regional Emissions (On-site + Off-site)						
Year 2017						
Demolition	3	29	22	0.0	2	2
Year 2018						
Utility Relocation	1	7	5	0.0	1	0
Site Preparation/Excavation	2	23	17	0.0	2	1
Concrete Pours	1	11	8	0.0	1	1
Building Construction	4	31	25	0.0	2	2
Year 2019						
Building Construction and Building Architectural Coatings	7	31	27	0.0	2	2
Year 2020						
Kitchen Upgrades, Administration Building Reuse, Restripe Parking Lot, Landscaping	3	22	23	0.0	2	1
Maximum Regional Emissions	7	31	27	0	2	2
SCAQMD Daily Significance Thresholds	75	100	550	150	150	55
Over/(Under)	(68)	(69)	(523)	(150)	(148)	(53)
Exceed Threshold?	No	No	No	No	No	No

^a Compiled using the CalEEMod emissions inventory model. The equipment mix and use assumption for each phase is provided in Appendix A.

^b PM₁₀ and PM_{2.5} emissions estimates are based on compliance with SCAQMD Rule 403 requirements for fugitive dust suppression.

^c Asphalt paving and architectural coating would occur during the building stage.

Source: ESA PCR 2016.

With implementation of SCs AQ-2 and AQ-4, impacts with respect to construction emissions would be less than significant. No mitigation measures or further evaluation are required.

Operational Impacts

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 ten years and operational emissions are not expected to increase in the long-term.²⁵

The SCAQMD has separate significance thresholds to evaluate potential impacts associated with the incremental increase in criteria air pollutants associated with long-term project operations. Operational emissions related to baseline and project conditions were computed using the CalEEMod emissions inventory model.

²⁵ *Ibid*, at pages 5.3-29.

Implementation of the proposed project would result in a net increase of vehicle trips to and from the project site as compared to existing conditions. The proposed project would also result in a slight increase in stationary source emissions, including the consumption of fossil fuels for comfort heating and the generation of electricity for cooling, lighting, and power needs, as compared to existing conditions. As indicated in **Table B-2, Project Related Operational Emissions**, the proposed project would result in a slight increase of criteria pollutant emissions; however, such emissions would be below the SCAQMD daily significance thresholds for long-term regional operations. Furthermore, the District is required to comply with all applicable regulations, and will implement SC-AQ-5 to further reduce project-related operational impacts.

SC-AQ-5: LAUSD shall encourage ride-sharing programs for students and teachers as well as maintain fleet vehicles such as school buses, maintenance vehicles, and other service fleet vehicles in good condition in order to prevent significant increases in air pollutant emissions created by operation of a new school.

With implementation of SC-AQ-5, the proposed project would not have a substantial air quality impact resulting from long-term operational emissions, and impacts would be less than significant. No mitigation measures or further evaluation are required.

Table B-2

**Project-Related Operational Emissions ^a
(Pounds per Day)**

Emission Source	VOC	NO_x	CO	SO_x	PM₁₀	PM_{2.5}
Regional Project Emissions						
Area ^a	1	<1	<1	<1	<1	<1
Energy	<1	<1	<1	<1	<1	<1
Mobile	1	2	7	<1	1.54	0.43
Total	2	2	7	<1	1.55	0.44
SCAQMD Significance Threshold	55	55	550	150	150	55
Difference	(53)	(53)	(543)	(150)	(148)	(55)
Significant?	No	No	No	No	No	No
Localized Project Emissions						
Area ^a	1	<1	<1	<1	<1	<1
Energy	<1	<1	<1	<1	<1	<1
Mobile	1	<1	<1	<1	<1	<1
SCAQMD Significance Threshold ^b	--	80	498	--	1	1
Difference	--	(79)	(497)	--	(0.99)	(0.99)
Significant?	--	No	No	--	No	No

^a Area source emissions are calculated using the CalEEMod emissions model. Area sources include natural gas consumption, landscape fuel consumption, consumer products and miscellaneous sources (e.g., commercial solvent usage, architectural coatings).

^b Localized significance threshold from SCAQMD Look-Up tables for a 1-acre site in East San Fernando Valley (SRA 7) with the nearest sensitive receptor at 25 meters from the Site. Worksheets and modeling output files are provided in Appendix A.

Source: ESA PCR 2016.

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

Less Than Significant Impact. Long-term air pollutant emissions are associated with mobile sources, primarily vehicle trips. Area sources, such as fuel use in landscaping equipment, aerosols, and off-gas emission from the application of paint, as well as energy use can also cause long-term emissions. Mobile sources are generally the largest contributor to the overall long-term emissions inventory associated with operation of a school.²⁶

Construction Impacts

As stated in the Program EIR, SUP-related construction activities may generate short-term emissions that exceed significance thresholds and cumulatively contribute to SoCab non-attainment designations. However, as discussed in Response to Checklist Question III.b above, construction emissions for the proposed project are not expected to exceed thresholds or contribute to non-attainment, nor are they expected to result in a cumulatively considerable net increase of any criteria pollutant for which the SCAQMD has established a localized impact threshold. Furthermore, the District will implement SCs AQ-2, AQ-4, and AQ-5 to ensure that construction emissions would have minimal off-site impacts.^{27,28} Therefore, the emissions of non-attainment pollutants and precursors generated by proposed project construction in excess of the SCAQMD project-level thresholds would be less than significant.

Operational Impacts

The Program EIR also 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 SoCab.²⁹ As discussed in Response to Checklist Question III.b above, peak daily emissions of operation-related pollutants would not exceed SCAQMD regional significance thresholds. By applying SCAQMD's cumulative air quality impact methodology, implementation of the proposed project would not result in an addition of criteria pollutants such that cumulative impacts would occur, in conjunction with related projects in the region. Therefore, the emissions of non-attainment pollutants and precursors generated by project implementation in excess of the SCAQMD project-level thresholds would be less than significant. No mitigation measures or further evaluation are required.

²⁶ *Ibid*, at pages 5.3-28 to 5.3-30.

²⁷ *Ibid*, at pages 5.3-27 to 5.3-28.

²⁸ *Ibid*, at pages 5.3-12.

²⁹ *Ibid*, at page 5.3-29.

d) Expose sensitive receptors to substantial pollutant concentrations?

Less Than Significant Impact With Mitigation Incorporated. Implementation of the proposed project could expose sensitive receptors to elevated pollutant concentrations during construction activities if it would cause or contribute significantly to elevating those levels. These sensitive receptors include children, the elderly, persons with pre-existing respiratory or cardiovascular illness, and athletes and others who engage in frequent 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 site are existing students at Colfax Charter Elementary School, as well as residential uses surrounding the site.

Construction Impacts

The localized effects from the on-site 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 extensive earthwork for each individual phase will be performed on a portion of the 8.1-acre site, which is likely less than five acres for which LST mass rate look-up thresholds are applicable. As a conservative estimate, it was assumed that construction activities would be occurring on an area of one-acre on a daily basis. 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 Burbank monitoring station.

The results of the localized construction emissions analysis are presented in **Table B-3 – Unmitigated Localized Construction Emissions**. It should be noted that the results listed in Table B-3 are maximum values and do not represent relative average pollutant concentrations. As shown therein, the proposed project's incremental contribution to the background concentration for all pollutants would be below the applicable LSTs. Therefore, the project's localized construction impacts would be less than significant.

Emissions from the proposed project's construction activities would fall below both localized and regional SCAQMD significance thresholds. Therefore, project construction would not violate an air quality standard or contribute significantly to an existing or projected air quality violation, and impacts would be less than significant and no mitigation measures would be necessary.

Due to the relatively short construction duration and low demand for heavy duty diesel construction equipment (e.g., limited earthmoving activities) needed to complete the proposed project, toxic air contaminants (TAC) emissions from construction activities would not result in long-term health risks to existing off-site sensitive populations.

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 will implement SC-AQ-2 to ensure that sensitive receptors would have minimal exposure to construction emissions.^{30,31}

³⁰ *Ibid*, at pages 5.3-27 to 5.3-28.

Table B-3

Unmitigated Localized Construction Emissions^a
(pounds per day)

	NO_x	CO	PM₁₀^b	PM_{2.5}^b
Maximum Localized Emissions (On-site)				
Year 2017				
Demolition	26	19	2	1
Year 2018				
Utility Relocation	7	5	1	<1
Site Preparation/Excavation	14	9	1	1
Concrete Pours	11	8	1	1
Building Construction	30	21	2	2
Year 2019				
Building Construction and Building Architectural Coatings	30	23	2	2
Year 2020				
Kitchen Upgrades, Administration Building Reuse, Restripe Parking Lot, Landscaping	21	19	1	1
Maximum Regional Emissions	30	23	2	2
SCAQMD Daily Significance Thresholds ^c	80	498	4	3
Over/(Under)	(50)	(475)	(2)	(1)
Exceed Threshold?	No	No	No	No

^a Compiled using the CalEEMod emissions inventory model. The equipment mix and use assumption for each phase is provided in Appendix A.

^b PM₁₀ and PM_{2.5} emissions estimates are based on compliance with SCAQMD Rule 403 requirements for fugitive dust suppression.

^c Localized significance threshold from SCAQMD Look-Up tables for a 1-acre site in East San Fernando Valley (SRA 7) with the nearest sensitive receptor at 25 meters from the Site.

Source: PCR 2016.

Asbestos, Lead Based Paint and Polychlorinated Biphenyls

Due to the age of the structures to be demolished or remodeled, it is suspected that the building materials may contain asbestos and or lead-based paint.

Polychlorinated biphenyls (PCBs) were used as coolants, insulating materials and lubricants in electrical materials, such as transformers. With regard to PCBs, the "Phase I Environmental Site Assessment Colfax Elementary School, 11724 Addison Street, Los Angeles, California" indicated that there were three transformers present on the site. However, these transformers were indicated to be dry-type, and therefore there would be no PCBs present on the project site associated with the transformers.³² 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

³¹ *Ibid*, at pages 5.3-12.

³² Phase I Environmental Site Assessment Colfax Elementary School, 11724 Addison Street, Los Angeles, California, prepared for Los Angeles Unified School District, Office of Environmental Health and Safety by WorleyParsons, January 21, 2016, at page 37.

buildings meeting the age criteria and adjacent unpaved areas.³³ Soil sampling conducted during the Preliminary Environmental Assessment indicated PCB concentrations in soil samples were below the laboratory detection limit.³⁴ Nevertheless, if PCBs are identified during demolition and construction activities on the project site, District protocols will be followed for the proper handling and removal of such materials.

Asbestos was commonly used in ceiling tiles, pipe insulation, floor tiles and linoleum prior to the 1980's. Asbestos fibers are strong and heat resistant, but when broken down, particles may become airborne. Exposure to airborne asbestos fibers is linked to a variety of health impacts, most notably lung cancer.

The U.S. Environmental Protection Agency identified asbestos as a hazardous air pollutant pursuant to Section 12 of the Federal Clean Air Act. Further, the California Air Resources Board (CARB) has identified asbestos as a TAC pursuant to the California Health and Safety Code (Section 39650 et seq.). Asbestos is also regulated as a potential worker safety hazard by the California Occupational Safety and Health Administration (CalOSHA). The SCAQMD regulates asbestos emissions from demolition activities pursuant to Rule 1403. These rules and regulations prohibit the release of asbestos from asbestos-related demolition or construction activities; require medical examinations and monitoring of employees working in proximity to asbestos containing materials; specify precautions and safe work practices that must be followed to minimize the potential for asbestos exposure; and require notice to federal and local government agencies prior to any renovation or demolition activities that could disturb asbestos. In addition, Rule 1403 requires a Notification of Demolition or Asbestos Removal form to be submitted for public notification.

As discussed in the response to Checklist Question VIII.a, the Program EIR provides a complete protocol for the handling of asbestos containing materials, including required procedures whenever asbestos containing materials would be disturbed, in compliance with federal and state regulations.³⁵ Prior to any demolition activities, a member of LAUSD's Facilities Environmental Technical Unit (FETU) will inspect the facilities to be demolished and will determine if asbestos is present. In the event asbestos is found, no demolition activities will be performed until proper abatement procedures have been performed. Asbestos will be removed by a licensed asbestos abatement contractor under the supervision of LAUSD's FETU. Removal and disposal of asbestos will be performed in compliance with SCAQMD Rule 1403 and CalOSHA standards to protect the health of construction workers and nearby residents. In addition, LAUSD Section 13280 (Asbestos Abatement and Asbestos Related Disturbance, November 21, 2003) will be implemented as needed.³⁶

The District also has a complete protocol for the removal of lead-based paint in building materials, in compliance with applicable health and safety and hazardous materials regulations.³⁷ Lead-based paint may have been used on school structures constructed before 1993. Prior to any demolition activities, the site must be inspected by properly trained contractors and reviewed by LAUSD's FETU, as all coated surfaces (paint, varnish, or glazed) are assumed to contain lead.³⁸ If lead is found on-site, abatement will be

³³ *Preliminary Environmental Assessment Equivalent Document Colfax Elementary School Classroom Addition Project, 11724 Addison Street, Valley Village, California 91607, prepared for Los Angeles Unified School District, Office of Environmental Health and Safety by WorleyParsons, May 23, 2016, page 5.*

³⁴ *Ibid, page 13*

³⁵ *LAUSD School Upgrade Program Final Environmental Impact Report, September 2015, pages 5.8-34 to 5.8-36.*

³⁶ *Ibid.*

³⁷ *Ibid, at pages 5.8-36 to 5.8-38.*

³⁸ *Ibid.*

performed according to specific handling procedures established by the District. In addition, LAUSD Section 13282 (Lead Abatement and Lead Related Construction Work, March 15, 2007), LAUSD Section 13614 (Abatement of Hazardous Materials, July 7, 2003), and LAUSD Section 02 8400 (Draft Polychlorinated Biphenyl (PCB) Remediation, October, 2016]) will also be implemented as appropriate.³⁹

Compliance with District protocols regarding the handling and removal of asbestos containing materials and lead-based paint, and PCBs would limit exposure to nearby sensitive receptors as well as students on-site. Therefore, emissions of lead-based paint, asbestos, and/or PCBs would be minimal and would result in a less than significant impact with regard to sensitive receptor exposure.

Operational Impacts

The SCAQMD recommends a hot-spot evaluation of potential localized CO impacts when vehicle to capacity (V/C) ratios are increased by two percent or more at intersections with a level of service (LOS) of D or worse. However, the project-related trips would not result in study intersections meeting this criteria. Therefore, no additional analysis of this issue is necessary, and it is concluded that the proposed project would not cause any new or exacerbate any existing CO hotspots. Accordingly, impacts related to localized mobile-source CO emissions would be less than significant.

Furthermore, the Program EIR states the operation of SUP projects would not expose sensitive receptors to substantial pollutant concentrations due to the fact that stationary sources at schools have nominal emissions, related to the use of natural gas heaters and boilers, landscaping equipment, and consumer products (cleaning products).⁴⁰ Although new vehicle trips would be generated by this project, SUP-related CO hotspot impacts would be less than significant according to the Program EIR.⁴¹ In addition, the District would implement SC-AQ-5, and long-term project impacts would be considered less than significant.

To provide a conservative analysis, the SCAQMD LST lookup tables were used to assess localized operational impacts, similar to the localized construction emissions by extrapolating the threshold values for a one-acre site according to the LST methodology. As shown in Table B-3, on-site sources of emissions would remain below SCAQMD LST thresholds.

During operation of the project, on-site food services will routinely be provided. The kitchen will be upgraded as part of the project and would include the installation of charbroilers. Regional emissions would likely be negligible and exhaust systems would be designed to vent charbroiler emissions away from students and staff. Food service trucks operating on-site during school hours would be limited by the CARB Air Toxic Control Measure to no more than five minutes of idling at a time. Food trucks would use plug-in power and natural gas for food service operations.

Construction and operation of the proposed project would not result in any substantial localized or regional air pollution impacts, and therefore would not expose nearby sensitive receptors to substantial pollutant concentrations. In addition, construction activities will comply with District protocols and project design features (PDFs), and all applicable regulations, including SCAQMD Rule 403 regarding the control of fugitive

³⁹ *Ibid.*

⁴⁰ *Ibid, at page 5.3-31.*

⁴¹ *Ibid.*

dust and other specified dust control measures. As such, impacts to off-site sensitive receptors from criteria pollutants would be less than significant. No mitigation measures or further evaluation would be required.

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

Less Than Significant Impact. Potential sources that may emit odors during construction activities include the use of architectural coatings and solvents. According to the SCAQMD *CEQA Air Quality Handbook*, construction equipment is not a typical source of odors. SCAQMD Rule 1113 limits the amount of volatile organic compounds from architectural coatings and solvents. Via mandatory compliance with SCAQMD Rules, no construction activities or materials are proposed which would create objectionable odors. Any construction-related odor emissions from construction equipment exhaust and application of asphalt and architectural coatings would be temporary and intermittent in nature, and such odors would cease upon the drying or hardening of the odor-producing materials.⁴² The nearest sensitive receptors to the site are existing students at Colfax Charter Elementary School, as well as residential uses surrounding the site. However, the proposed uses for the project would not typically generate nuisance odors at nearby sensitive receptors.

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 would not involve elements related to these types of uses. On-site trash receptacles used by the proposed project would be covered and properly maintained to prevent adverse odors. With proper housekeeping practices, trash receptacles would be maintained in a manner that promotes odor control. No adverse odor impacts are anticipated from this type of land use. While there is a potential for odors to occur, compliance with industry standard odor control practices, SCAQMD Rule 402 (Nuisance), and SCAQMD Best Available Control Technology Guidelines would limit potential objectionable odor impacts to a less than significant level. Furthermore, the Program EIR states the implementation of SUP-related projects would not create objectionable odors due to the land use types permitted on school grounds.⁴³ Therefore, odor impacts related to project implementation would be less than significant. No mitigation measures or further evaluation are required.

IV. BIOLOGICAL RESOURCES

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 an existing school campus, and there are no known candidate, sensitive, or special status species known to occur at Colfax Charter Elementary School. If any species were to occur,

⁴² LAUSD School Upgrade Program Final Environmental Impact Report, September 2015, page 5.3-32.

⁴³ *Ibid.*

LAUSD requires all SUP-related projects to comply with applicable US Fish and Wildlife Service (USFWS), and California Department of Fish and Wildlife (CDFW) regulations. There would be no impact with respect to sensitive species as a result of project implementation, as there are no known special-status species on the project site. No mitigation measures or further evaluation are 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 US Fish and Wildlife Service?

No Impact. The project site is an existing school campus, and it does not contain a sensitive natural community, as designated by the City or County of Los Angeles, the CDFW or the USFWS.⁴⁴ No riparian habitat exists on or near the site. With respect to new construction on existing campuses, such projects would not cause the loss of sensitive habitats, since none are present on existing District campuses. While some campuses may contain native gardens, these are instructional and ornamental gardens subject to periodic or seasonal disturbances and do not provide substantial habitat value.⁴⁵ As such, there would be no impact in this regard to sensitive natural communities. No mitigation measures or further evaluation are required.

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

No Impact. The project site does not contain any federally protected wetlands as defined by Clean Water Act Section 404. With respect to new construction on existing campuses, such projects would not occur on federal jurisdictional waters or wetlands. As such, the proposed project would have no impact on federally protected wetlands. No mitigation measures or further evaluation are 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 nursery sites?

Less Than Significant Impact With Mitigation Incorporated. No regional wildlife corridors exist within the vicinity of the Colfax Charter Elementary School site. Due to the nature of the project and its location within an existing school campus, the only wildlife for which the potential to impact movement exists, are migratory birds. As is the case for most LAUSD campuses, Colfax Charter Elementary School is developed and in a suburban/urbanized setting next to urban land uses. Campuses are not available for overland wildlife movement of migration, especially recognizing that all school campuses are enclosed with perimeter fencing. No existing District schools are in a designated habitat linkage.⁴⁶

⁴⁴ *Ibid*, at page 5.4-42.

⁴⁵ *Ibid*, at page 5.4-46.

⁴⁶ *Ibid*, at pages 5.4-43 and 5.4-47.

With respect to SUP-related projects, some may require the removal of mature trees and shrubs, as is the case with the project proposed at Colfax. The Carlberg Associates tree inventory for the Colfax Charter Elementary School, included as Appendix B, surveyed 153 trees on site. Approximately 40 trees of varying age and size, and numerous shrubs located within planters would be removed as a part of the project, while 113 of the existing trees will remain in their locations. Of the approximately 40 trees to be removed, 26 trees, including one protected coast live oak tree, would be removed for new construction, while 14 other trees would be removed for school safety considerations. **Table B-4**, Tree Disposition List, below indicates which trees, according to the number assigned on the site plan, will be removed. Table B-4 includes the tree number as indicated on the site plan, common name, botanical name, and whether the tree will be removed for construction purposes/necessity or for safety concerns.

Table B-4
Tree Disposition List

Number of Tree on Site Plan	Common Name	Botanical Name	Construction	Safety
3	California pepper	<i>Schinus molle</i>	X	
4	She-oak	<i>Casuarina equisetifolia</i>	X	
5	Torrey pine	<i>Pinus torreyana</i>	X	
7	Canary Island pine	<i>Pinus canariensis</i>	X	
8	swamp mahogany	<i>Eucalyptus robusta</i>	X	
9	red ironbark	<i>Eucalyptus sideroxylon</i>	X	
13	Hong Kong orchid tree	<i>Bauhinia x blakeana</i>	X	
14	crape myrtle	<i>Lagerstroemia indica</i>	X	
26	Australian willow	<i>Geijera parvifolia</i>	X	
27	Australian willow	<i>Geijera parvifolia</i>	X	
28	Australian willow	<i>Geijera parvifolia</i>	X	
29	Australian willow	<i>Geijera parvifolia</i>	X	
30	flood gum	<i>Eucalyptus rudis</i>		X
31	lemon scented gum	<i>Corymbia citriodora</i>	X	
34	silk oak	<i>Grevillea robusta</i>	X	
36	lemon bottlebrush	<i>Callistemon citrinus</i>	X	
37	lemon bottlebrush	<i>Callistemon citrinus</i>	X	
38	silk oak	<i>Grevillea robusta</i>		X
39	blue gum	<i>Eucalyptus globulus</i>	X	
44	manna gum	<i>Eucalyptus viminalis</i>		X
45	Chinese elm	<i>Ulmus parvifolia</i>	X	
46	coast live oak	<i>Quercus agrifolia</i>	X	
47	Italian cypress	<i>Cupressus sempervirens</i>	X	
48	Aleppo pine	<i>Pinus halepensis</i>	X	
49	California pepper	<i>Schinus molle</i>		X
50	California pepper	<i>Schinus molle</i>		X
51	Aleppo pine	<i>Pinus halepensis</i>		X
52	Aleppo pine	<i>Pinus halepensis</i>		X
55	Red River gum	<i>Eucalyptus camaldulensis</i>		X
58	California pepper	<i>Schinus molle</i>		X
88	silk oak	<i>Grevillea robusta</i>		X
91	Australian willow	<i>Geijera parvifolia</i>	X	

Number of Tree on Site Plan	Common Name	Botanical Name	Construction	Safety
92	red ironbark	<i>Eucalyptus sideroxylon</i>	X	
104	silk oak	<i>Grevillea robusta</i>		X
106	silk oak	<i>Grevillea robusta</i>		X
127	Acacia	<i>Acacia species</i>		X
131	silk oak	<i>Grevillea robusta</i>		X
133	lemon bottlebrush	<i>Callistemon citrinus</i>	X	
134	lemon bottlebrush	<i>Callistemon citrinus</i>	X	
135	lemon bottlebrush	<i>Callistemon citrinus</i>	X	

However, the loss of these trees and planters would be more than compensated for through planting of 34 new trees and other landscaping features.⁴⁷ All projects that would remove trees would implement LAUSD SC-BIO-3 requiring intensive avian nest search and delaying the removal of trees containing active nests.⁴⁸

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

- Project activities (including, but not limited to, staging and disturbances to native and nonnative vegetation, structures, and substrates) should occur outside of avian breeding season to avoid take of birds or their eggs. Depending on the avian species present, a qualified biologist may determine that a change in the breeding season dates is warranted.
- If avoidance of the avian breeding season is not feasible, beginning 30 days prior to the initiation of the project activities, a qualified biologist with experience in conducting breeding bird surveys shall conduct weekly bird surveys to detect protected native birds occurring in suitable nesting habitat that is to be disturbed and (as access to adjacent areas allows) any other such habitat within 300 feet of the disturbance area (within 500 feet for raptors). The surveys shall continue on a weekly basis with the last survey being conducted no more than three days prior to the initiation of project activities. If a protected native bird is found, LAUSD shall delay all project activities within 300 feet of the suitable nesting habitat (within 500 feet for suitable raptor nesting habitat) until August 31. Alternatively, the qualified biologist could continue the surveys in order to locate any nests. If an active nest is located, project activities within 300 feet of the nest (within 500 feet for raptor nests), or as determined by a qualified biologist, shall be postponed until the nest is vacated and juveniles have fledged and there is no evidence of a second attempt at nesting. Flagging, stakes, and/or construction fencing shall be used to demarcate the inside boundary of the 300- or 500-foot buffer between the

⁴⁷ A total of 40 existing landscape trees will be removed as part of the project, 14 of which are being removed for student safety reasons. Only one coast live oak tree is a native protected tree under the City's protected tree ordinance. The replacement of 34 new trees and extensive new landscaping, in accordance and consistent with LAUSD Standard Conditions, will mitigate the loss of the removed trees. In addition, LAUSD is planting nine new Coast live oaks to replace the loss of a single specimen coast live oak, which is more than twice what is required by the City of Los Angeles. As such, the tree replacement and landscaping program sufficiently mitigates for the removal of the landscape trees, according to Daryl Koutnik, PCR's biological resources expert.

⁴⁸ LAUSD School Upgrade Program Final Environmental Impact Report, September 2015, at page 5.4-48.

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 determined 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 the LAUSD OEHS project manager. Construction contractors can then reduce the demarcated buffer.
- No construction shall occur within the fenced nest zone until the young have fledged, are no longer being fed by the parents, have left the nest, and will no longer be impacted by the construction.
- A biological monitor shall be present on site during all grubbing and clearing of vegetation to ensure that these activities remain outside the demarcated buffer and that the flagging, stakes, and/or construction fencing are maintained, and to minimize the likelihood that active nests are abandoned or fail due to project activities. The biological monitor shall send weekly monitoring reports to LAUSD OEHS project manager during the grubbing and clearing of vegetation, and shall notify LAUSD immediately if project activities damage avian nests.

With implementation of SC-BIO-3, impacts related to the interference with migratory birds or avian nesting would be less than significant. No mitigation measures or further evaluation are required.

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

Less Than Significant Impact With Mitigation Incorporated. Implementation of the project would require the removal of approximately 40 mature trees, as discussed above in Response to Checklist Question IV.4. A single specimen of a coast live oak (*Quercus agrifolia*), which is a City of Los Angeles Protected Tree, as defined in Section 17.02 of the City of Los Angeles Municipal Code, may require removal as a part of the project construction.⁴⁹ An application for a tree removal permit will be submitted to the City of Los Angeles Department of Public Works. A Protected Tree Report will be submitted with the application identifying the proposed mitigation. The current minimum tree replacement ratio is 4:1, and, in excess of what the City of Los Angeles requires, the project proposes to plant nine coast live oaks to mitigate the impact of removing the single specimen. Adhering to the replacement requirements in the approved tree removal permit will ensure the removal of the oak tree would not conflict with City tree preservation policies or ordinances. As such, removal of the single oak tree would be mitigated, and related impacts would be less than significant.

⁴⁹ City of Los Angeles Ordinance No. 177404, *Preservation of Protected Trees*.

In addition, SUP-related projects must comply with LAUSD SCs to reduce impacts to birds, SC-BIO-3 as described above, and native oak trees with SC-BIO-4, which are applicable to the project.⁵⁰ It is noted that no oak woodland habitat exists on the school campus, and the project would not impact oak woodland habitat.

SC-BIO-4: If there is removal of any native mature oak trees or woodland habitat, LAUSD shall comply with the following:

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

⁵⁰ LAUSD School Upgrade Program Final Environmental Impact Report, September 2015, pages 5.4-15 to 5.4-17 and 5.4-48.

- LAUSD shall request CDFW review and comment on any translocation plans, habitat preservation, habitat creation and/or restoration plans.

With implementation of SCs-BIO-3 and BIO-4, compliance with the City of Los Angeles Municipal Code requirements regarding the preservation of protected trees, and adhering to the requirements of the tree removal permit, including tree replacement requirements, potential impacts related to conflicts with local policies or ordinances protecting biological resources, especially the native on-site oak tree, would be less than significant. No additional mitigation measures or further evaluation are required.

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

No Impact. The project site is not located within an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. There are no habitat reserves located within the District, nor are there any other habitat conservation plans in the District.⁵¹ Therefore, no impact would occur as a result of project implementation. No mitigation measures or further evaluation are required.

V. CULTURAL RESOURCES

The following evaluation of cultural resources is based, in part, on the Secretary of the Interior's (SOI) Standards Review for LAUSD Colfax Avenue Elementary School Classroom Addition Project at 11724 Addison Street, North Hollywood, California ("SOI Standards Review") prepared by PCR's historic resources practice group staff on August 30, 2016. The SOI Standards Review, which is included as Appendix C of this Mitigated Negative Declaration (MND), summarizes a site visit and assesses the potential impacts of the project to the Colfax Charter Elementary School. A Character Defining Features Memorandum (CDFM) as Attachment A of the SOI Standards Review.

Would the project:

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

Less Than Significant Impact. A project site visit was conducted by qualified ESA PCR architectural historians to identify historical resources over 45 years in age on the project site and vicinity and to assess potential Project impacts on identified historical resources. The project site contains one historical resource, Colfax Charter Elementary School, a Mid-Century Modern-style school constructed between 1950 and 1955. The campus has been included in two previous historic resources surveys. In 2013, the campus was surveyed by the City of Los Angeles Department of City Planning's Office of Historic Resources for the SurveyLA historic resources survey of the North Hollywood-Valley Village Community Plan Area. Colfax Charter Elementary School was recommended eligible for listing at the national, state, and local levels as an

⁵¹ *Ibid*, at page 5.4-48.

excellent example of a post-World War II LAUSD elementary school as a result of the 2013 survey and assigned California Historical Resource (“CHR”) status codes of 3S, 3CS, and 5S3.⁵² During the 2014 Historic Resources Inventory Survey prepared for LAUSD, Colfax Charter Elementary School was recommended eligible as a historic district under the California Register Criterion 1. Colfax Charter Elementary School was assigned a CHR status code of 3CD, “appears eligible for the California Register as a contributor to a California Register eligible district through survey evaluation.”⁵³

A historical resource is defined in Section 15064.5(a)(3) of the CEQA *Guidelines* as any object, building, structure, site, area, place, record, or manuscript determined to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California. Historical resources are further defined as being associated with significant events, important persons, or distinctive characteristics of a type, period or method of construction; representing the work of an important creative individual; or possessing high artistic values. Resources listed in or determined eligible for the California Register, included in a local register, or identified as significant in a historic resource survey are also considered historical resources under CEQA.

Similarly, the National Register criteria (contained in 36 CFR 60.4) are used to evaluate resources when complying with the National Historic Preservation Act (NHPA) Section 106. Specifically, National Register criteria state that eligible resources comprise districts, sites, buildings, structures, and objects that possess integrity of location, design, setting, materials, workmanship, feeling, and association, and that (a) are associated with events that have made a significant contribution to the broad patterns of our history; or (b) that are associated with the lives of persons significant in our past; or (c) that embody the distinctive characteristics of a type, period, or method of construction, or that possess high artistic values, or that represent a significant distinguishable entity whose components may lack individual distinction; or (e) that have yielded or may be likely to yield, information important to history or prehistory.

A substantial adverse change in the significance of a historical resource, as a result of a project or development, is considered a significant impact on the environment. Substantial adverse change is defined as physical demolition, relocation, or alteration of a resource or its immediate surroundings such that the significance of the historical resource would be materially impaired. Direct impacts are those that cause substantial adverse physical change to a historic property. Indirect impacts are those that cause substantial adverse change to the immediate surroundings of a historic property, such that the significance of a historical resource would be materially impaired.

ESA PCR’s architectural historians conducted additional research, analysis, and evaluation to supplement the previous surveys. An intensive pedestrian survey was conducted on November 12, 2015 to document the existing conditions of the campus using digital photography, and an in-house review of the California Points of Historical Interest, California Historical Landmarks, California Register, National Register, and California State Historic Resources Inventory were conducted. Historic *Los Angeles Times* articles as well as Los Angeles County assessor’s records, American Institute of Architects Historical Directory of American Architects archives, the LAUSD Historic Context Statement (1870-1969), and historic LAUSD architectural drawings

⁵² *Architectural Resources Group, SurveyLA: Los Angeles Historic Resources Survey of North Hollywood-Valley Village Community Plan Area, Historic Districts, Planning Districts and Multi-Property Resources, Prepared for the City of Los Angeles Department of City Planning Office of Historic Resources (February 26, 2013): 143-144.*

⁵³ *Sapphos Environmental, Inc., Debi Howell-Ardila, MHP, DPR Form: Colfax Avenue Elementary School, Prepared for LAUSD (January 24, 2014).*

were also examined. Additionally, ESA PCR reviewed themes and architectural styles associated with the Mid-Century Modern period presented in the LAUSD Historic Context Statement.⁵⁴ ESA PCR prepared a Character-Defining Features Memorandum in May 2016 summarizing the existing buildings, architectural elements, features, materials, finishes, spaces, and landscape elements that contribute to the eligibility of Colfax Charter Elementary School as a historical resource. Following completion of the project design development submittal plans drawn by AC Martin and dated April 25, 2016, ESA PCR reviewed the project design for conformance to the Secretary of the Interior's Standards for Rehabilitation ("SOI Standards"), which is included as Appendix C of this Draft MND.

Historic Overview

Educating the Baby Boom: The Postwar Modern, Functionalist School Plant (1945-1969). The massive population increase in California following the end of World War II was brought on by a combination of the baby boom and an influx of new residents from other parts of the United States. Growth especially impacted the San Fernando Valley, where the subject school is located, which swiftly turned from farmlands into subdivisions. In 1961, LAUSD was created, combining the elementary and high school entities into a whole. Expansion of the built environment during this period was exceptional, as development and infrastructure raced to keep up with increasing demand. Enormous pressure was put on educational facilities to expand as the baby boomers began to enter school.⁵⁵

Part of the response to the dramatic shortage of schools and classrooms was a standardization of ideas about school design across the country. This new uniformity was facilitated through the creation of organizations, journals, and guidebooks dedicated to developing and disseminating ideas on school design. The type of school advocated was a modern school of contemporary design, with a decentralized plan, low massing, indoor/outdoor space, natural light and ventilation, and an informal character. The three primary plan types used during this period were the finger-plan, the cluster-plan, and the open-plan, all of which emphasized the aforementioned design characteristics. These schools were generally constructed where land was plentiful and are characterized by sprawling, low main buildings or clusters of buildings connected by covered walkways and possessing individual patios or open courtyards, encouraging air circulation and taking maximum advantage of the climate. One-story buildings also substantially reduced the overall superstructure and consequent earthquake and fire risk, as access to the outdoors was readily available. Such architecture was primarily applied to grade schools, while two-story design was still favored for high schools. The subject school expresses many of these design concepts in its site plan and architecture.⁵⁶

Colfax Charter Elementary School Construction History. The history of the campus dates back to 1902 when Dr. A. F. Schiffman, one of the founders of the Jonathan Club (a political/social club in Southern California), purchased the 10-acre site and began to plant a variety of tree species.⁵⁷ At the time LAUSD purchased the property in 1949 there were approximately 200 species of trees planted on the site; including redwoods, elms, maples, catalpas, mulberry, willows, camphor, magnolias, eucalyptus, and sycamores. LAUSD's acquisition of the property was controversial and as a condition of the purchase the District

⁵⁴ Sapphos Environmental, Inc., *Los Angeles Unified School District: Historic Context Statement, 1870 to 1969* (March 2014).

⁵⁵ Sapphos Environmental, Inc., *Los Angeles Unified School District: Historic Context Statement, 1870 to 1969* (March 2014): 71-113.

⁵⁶ *Ibid.*

⁵⁷ "Landmarks: School Plan Perils 1500 Trees," Newspaper in Colfax ES archive – undated.

promised to retain as many trees as possible. It appears the existing trees around the perimeter of the campus are a remnant of Dr. A. F. Schiffman's passion for horticulture.

The first plans for Colfax Charter Elementary School were drawn by William Glenn Balch and Louis L. Bryan, Architects, in May of 1950. The prominent landscape architect, Fred Barlow, Jr., incorporated his new landscape design among the remaining tree plantings on the site. The campus was constructed on a rectangular shaped block, with the school buildings located at the north end of the block and the playground occupying the southern portion. The campus was laid out in essentially a finger plan, with a covered walkway unifying the site plan by wrapping around at least two elevations of the administration office, eight classroom buildings, and two sanitary buildings thereby creating a continuous covered walkway around all of the buildings.⁵⁸

Four years later plans were prepared for the L-shaped Multi-Purpose building drawn by John B. Lyman and Russell E. Collins, associated architects, located at the northeast corner of the block.⁵⁹ According to the 1954 plan set, the architects also designed multi-purpose buildings for three other campuses: Dixie Canyon Avenue School, Nestle Avenue School, and Toluca Lake School. The architectural drawings for these four multi-purpose buildings are similar.

The southeast portion of the block is improved with several portable/temporary buildings added during the 1990s.⁶⁰ Plans dating from November 1992 detail a number of improvements designed to comply with the Americans with Disabilities Act and include: restroom updates in Building A, Multi-purpose Building L, and Sanitary Building K; handicapped drinking fountain installed on the south elevation near the southwest corner of the Multi-Purpose Building L; and some onsite paving repairs.

A number of alterations and repairs have taken place over the years on campus, including seismic and systems upgrades, the installation of air-conditioner units, replacement of original hardscaping, new fencing, and various safety improvements. In addition, alterations to original classroom wings include the infilling of clerestory awning windows and entry glazing, and replacement of original windows with air-conditioner units; such changes are visible on several of the classroom wings.

Impacts Assessment

LAUSD is proposing the construction of a new Classroom and Administration Building, Kindergarten Building, expanded lunch shelter and arcades, the removal of 10 portable classrooms situated in five buildings, repurposing and rehabilitation of the original Administration Building, an expanded lunch shelter and arcade, and relocation of the school's main entry from Addison Street to Colfax Avenue. The project would retain the essential character-defining buildings, landscapes, features, and spatial relationships of

⁵⁸ 3164.03.000 May 1, 1950, New Plant – Buildings A, B, C, D, E, F, G, H, J and K

⁵⁹ 3164.VG.029, June 1, 1954, Building L (Multi-Purpose Building)

⁶⁰ 3164.VG.690, March 9, 1990, Site Access Compliance Work in Buildings A, K and L for Installation of Relocatable Buildings (Bldgs A-1415 thru A-1417)

3164.VG.794, July 24, 1991, Site work and utilities for installation of OSA approved modular relocatable buildings (Building A-1938)

3164.08.000, October 1, 1998, Install New Modular Building

3164.07.000, July 24, 2007, Site work for New Modular Building

Colfax Charter Elementary School that account for the school's eligibility for listing on the California Register. Constructed toward the rear west and east of the historic campus core, the new Classroom and Administration Building and Kindergarten Building would be compatible with the size and height of the Postwar Modern style campus and would protect the integrity of the historic campus core and preserve the existing relationship between the historical buildings and the setting. The historic character of the setting, landscape elements, pathways, and important views and visual relationships would be retained because of the placement and scale of the new buildings and the design sensitivity of the new buildings, arcades and the expanded lunch shelter. Additionally, the new buildings are inspired by the original Mid-Century Modern style classroom buildings in their design, massing and materials. Both new buildings would be articulated in contemporary designs with rectangular footprints and massing and sheathed in compatible, yet distinctive materials, such as stucco and fiber-reinforced horizontal cement siding. The introduction of new arcades from the proposed buildings unites the campus without compromising the significant finger-plan.

Furthermore, the re-purposing and rehabilitation of the Administration Building would retain and restore the historic appearance of the primary (north and west) elevations, while inserting needed new openings on the secondary (south and east) elevations that are non-distinctive and not visible from the public right-of-way. The rear (south) elevation is not a prominent elevation as it is shielded from views from within the campus by an attached arcade and Building 3. Views of the east elevation are blocked by shrubbery and an attached arcade. The changes proposed to repurpose and rehabilitate the Administration Building would be differentiated due to the use of materials, but compatible in their design, scale and size. Specifically, the new doors and frames would be hollow metal thereby differentiated in materials from the original wood doors and frames, yet the new doors would be designed in the same style and would be similar to all of the contributing doors found throughout the campus. The replacement and insertion of new doors would not detract from the original design of the Administration Building. Therefore, rehabilitation of the Administration Building would protect the integrity of the primary character-defining building and the work would conform to the SOI Standards.

In summary, the project would not materially impair the eligibility of the California Register eligible campus, as the character-defining features would be retained and the integrity of the campus would be protected. The project conforms to the SOI Standards and upon project completion the campus would remain eligible as a potential historical resource. Therefore, ESA PCR finds no direct impacts resulting from the project to Colfax Charter Elementary School.

Indirect impacts were analyzed to determine if the project would result in a substantial material change to the integrity and significance of historical resources or their contributing setting within the project vicinity. ESA PCR conducted an in-house records search to determine whether known historical resources have been previously recorded within the project site or within a quarter-mile of the project site. There are four potential historical resources within a quarter-mile radius of the project site:

5048 Colfax Avenue (located 0.09 mile to the northeast of the project site, assigned CHR Status Codes of 3S, 3CS, 5S3);

11816 W. Magnolia Boulevard (located 0.23 mile to the north of the project site, assigned CHR Status Codes of 3S, 3CS, 5S3);

11832 W. Magnolia Boulevard (located 0.24 mile to the north of the project site, assigned CHR Status Codes of 3CS, 5S3); and

11616 W. Morrison Street (located 0.10 mile to the east of the project site, assigned CHR Status Code of 5S3).

The four potential historical resources are approximately 0.09 to 0.24 mile away from the project site and do not have direct views of the campus or proposed project. Furthermore, there are no historical resources immediately adjacent to or across the street from the project site. Therefore, the project would have no indirect impacts on known or potential historical resources in the project vicinity.

In summary, the proposed project entails constructing two new buildings, arcades and an expanded lunch shelter on the project site, in addition to rehabilitating the existing Administration Building. The project would conform to the SOI Standards and after project completion Colfax Charter Elementary School would retain its eligibility for listing on the California Register. As such, the project would have no direct impacts to historical resources and no known adjacent historic resources or eligible contributors to a historic district would be indirectly impacted by the project. Therefore, pursuant to CEQA, the proposed redevelopment of the project site would not result in a significant adverse impact on historical resources. No further analysis of this topic in an environmental impact report is necessary.

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

Less Than Significant Impact With Mitigation Incorporated. An archaeological resource is defined in Section 15064.5(c) of the CEQA Guidelines as a site, area or place determined to be historically significant as defined in Section 15064(a) of the CEQA Guidelines, or as a unique archaeological resource defined in Section 21083.2 of the Public Resources Code as an artifact, object, or site that contains information needed to answer important scientific research questions of public interest or that has a special and particular quality such as being the oldest or best example of its type, or that is directly associated with a scientifically recognized important prehistoric or historic event or person. The project will not include excavation into previously undisturbed native soils, as the project site includes areas with existing structures and a turf field, with no known archaeological context and has been subject to past subsurface disturbance associated with grading and foundations. It is unlikely that undisturbed unique archeological resources exist on the project site. However, grading activities associated with development of the project would cause new subsurface disturbance and could result in the unanticipated discovery of unique archeological resources. With respect to all SUP projects, in the event of an unexpected disturbance, implementation of LAUSD SC-CUL-13 would ensure that impacts to archaeological resources would be less than significant.^{61,62}

SC-CUL-13: The contractor shall halt construction activities in the immediate area and notify the LAUSD. LAUSD shall retain a qualified archaeologist to make an immediate evaluation of significance and appropriate treatment of the resource. To complete this assessment, the qualified archaeologist will be afforded the necessary time to recover, analyze, and curate the find. The qualified archaeologist shall recommend the extent

⁶¹ LAUSD School Upgrade Program Final Environmental Impact Report, September 2015, , at pages 5.5-33 and 5.5-34.

⁶² Ibid, at pages 5.5-18.

of archaeological 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.

With implementation of SC-CUL-13, potential impacts related to archaeological resources would be less than significant. No mitigation measures or further evaluation are required.

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

Less Than Significant Impact With Mitigation Incorporated. As discussed in Response to Checklist Question V.b, the project will not include excavation into previously undisturbed native soils, as the project site includes areas with existing structures and a turf field, with no known paleontological context and has been subject to past subsurface disturbance associated with grading and foundations. It is unlikely that undisturbed unique paleontological resources exist on the project site. However, grading activities associated with development of the project would cause new subsurface disturbance and could result in the unanticipated discovery of unique paleontological resources. With respect to all SUP projects, in the event of an unexpected disturbance, implementation of LAUSD SC-CUL-19 would ensure that impacts to paleontological resources would be less than significant.^{63,64}

SC-CUL-19: LAUSD shall have a paleontological monitor on-call during construction activities. This monitor shall provide the construction crew(s) with a brief summary of the sensitivity, the rationale behind the need for protection of these resources, and information on the initial identification of paleontological resources. If paleontological resources are uncovered during construction, the on-call paleontologist shall be notified and afforded the necessary time and funds to recover, analyze, and curate the find(s). Subsequently, the monitor shall remain on-site for the duration of the ground disturbance to ensure the protection of any other resources that may be in the area.

With implementation of SC-CUL-19, potential impacts related to paleontological resources would be less than significant. No mitigation measures or further evaluation are required.

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

Less Than Significant Impact With Mitigation Incorporated. As discussed above, in Response to Checklist Questions V.b and V.c, the project will not include excavation into previously undisturbed native soils. However, grading activities associated with development of the project would cause new subsurface disturbance and could result in the unanticipated discovery of unknown human remains, including those interred outside of formal cemeteries, and unknown tribal cultural resources. LAUSD would comply with

⁶³ *Ibid*, at pages 5.5-35 and 5.5-36.

⁶⁴ *Ibid*, at page 5.5-19.

California Health and Safety Code Section 7050.5, regarding the treatment of buried human remains. With respect to all SUP projects, in the event of an unexpected discovery, implementation of LAUSD SC-CUL-1, SC-CUL-12, SC-CUL-13, SC-CUL-14, SC-CUL-16 and SC-CUL-17 would ensure that impacts related to the accidental discovery of human remains would be less than significant.^{65,66}

- SC-CUL-1:** **OEHS CEQA Specification Manual, Appendix H, Historical Resources Policy.** This document establishes assessment methodology and procedures for the identification and analysis of historical resources, unique archaeological resources, and paleontological resources pursuant to CEQA.
- SC-CUL-12:** 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-14:** 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 archaeological resources are buried on the site; and/or (2) when unique architectural 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-16:** Cultural resources sensitivity training shall be conducted by a qualified archaeologist for all construction workers involved in moving soil or working near soil disturbance. This training shall review the types of archaeological resources that might be found, along with laws for the protection of resources.
- SC-CUL-17:** LAUSD shall determine whether it is feasible to prepare and implement a Phase III Data Recovery/Mitigation Program. A Phase III Data Recovery/Mitigation Program would be designed by a Qualified Archaeologist to recover a statistically valid sample of the archaeological remains and to document the site to a level where the impacts can be determined to be less than significant. All documentation shall be prepared in the standard format of the ARMR Guidelines, as prepared by the OHP. Once a Phase III Data Recovery/Mitigation Program is completed, an archaeological monitor shall be present on site to oversee the grading, demolition activities, and/or initial construction activities to ensure that construction proceeds in accordance with the adopted Phase III Data Recovery/Mitigation Program. The extent of the Phase III Data Recovery/Mitigation Program and the extent and duration of the archaeological monitoring program depend on site-specific factors.

With implementation of LAUSD SC-CUL-1, SC-CUL-12, SC-CUL-13, SC-CUL-14, SC-CUL-16 and SC-CUL-17, potential impacts related to the discovery of unknown human remains would be less than significant. No mitigation measures or further evaluation are required.

⁶⁵ *Ibid*, at pages 5.5-36 and 5.5-37.

⁶⁶ *Ibid*, at pages 5.5-14 to 5.5-19.

VI. GEOLOGY AND SOILS

The following evaluation of geology and soils is based, in part, on the technical report for the project entitled Updated Geotechnical Investigation, Colfax Charter Elementary School Classroom Addition Project at 11724 Addison Street, Valley Village Area of Los Angeles, California (“Geotechnical Report”) prepared for LAUSD by Geocon West, Inc. on August 31, 2016. This Geotechnical Report, which is included as Appendix D-1 of this MND, evaluates geological and soil conditions at Colfax Charter Elementary School and in the project vicinity, as well as providing site-specific recommendations for appropriate foundations and construction methods. The Geotechnical Report reviewed “Geotechnical Evaluation, Colfax Charter Elementary School Modernization, 11724 Addison Street, Valley Village, California” prepared for LAUSD by Ninyo & Moore on May 3, 2016. The Ninyo & Moore Geotechnical Evaluation is included as Appendix D-2 of this MND.

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.

Less Than Significant Impact With Mitigation Incorporated. Colfax Charter Elementary School is located in the San Fernando Valley, in the Northwestern Block of the Los Angeles Basin, which is the part of the Transverse Ranges Geomorphic Province of California. The Los Angeles Basin has upper Cretaceous sediments, Tertiary and Quaternary marine and non-marine sedimentary and alluvial sediments, which are thousands of feet thick. Below the thick accumulations of sediments are crystalline Basement Complexes that are Mid-Cretaceous and older. The project site is located on the alluvial plains derived from the San Gabriel Mountains. This portion of the plains is mapped as young alluvial fan deposits. These Holocene deposits consist of inter-beds of loose to moderately dense layers of sand and silty sand with minor amounts of clay.⁶⁷

Fault rupture is the displacement that occurs along the surface of a fault during an earthquake. The California Geological Survey has established earthquake fault zones known as Alquist-Priolo Earthquake Fault Zones around the surface traces of active faults to assist cities and counties in planning, zoning, and building regulation functions. These zones identify areas where potential surface rupture along an active fault could prove hazardous and identify where special studies are required to characterize hazards to habitable structures.

Colfax Charter Elementary School is not located on an area designated as an Earthquake Fault Zone (formerly known as Alquist-Priolo Special Studies Zone); however, the site is located in a seismically active area, as is the majority of southern California.⁶⁸ Regardless of the site proximity to a fault, LAUSD conducts a geotechnical assessment and seismic hazard evaluation whenever new construction is taking place, including

⁶⁷ Updated Geotechnical Investigation, Colfax Charter Elementary School Classroom Addition Project at 11724 Addison Street, Valley Village Area of Los Angeles, California, prepared for LAUSD by Geocon West, Inc., August 31, 2016, at page 3.

⁶⁸ Ibid, at page 5.

a seismic database review, preparation of a draft report of findings and recommendations, and a final report. LAUSD's seismic hazard analysis complies with the latest requirements of the California Building Code (CBC) and California Geological Survey (CGS), with respect to the heightened standards required for the construction of public schools, hospitals, and essential services buildings.⁶⁹

No active faults are known to cross the project site, and the closest active fault is the Hollywood Fault, which is located approximately 4.3 miles from the project site.^{70,71,72} Therefore, the probability of damage from surface fault rupture is considered to be low.⁷³

The Geotechnical Report prepared for the proposed project recommends site-specific measures, as appropriate, to reduce the risk of seismic-related hazards and examines the potential for various hazards, including caving, ground motion, liquefaction, dynamic settlement, inundation and landslides. Furthermore, the Division of State Architect (DSA) approves designs for new school construction, and all projects must submit to DSA oversight and inspections during construction. The DSA must then certify that each new school building meets State of California statutory safety requirements.

With respect to SUP projects, the Program EIR states that continued compliance with standard seismic safety requirements of SC-GEO-1 would ensure that impacts related to surface rupture from a known active fault would be less than significant.^{74,75} SC-GEO-1 is a standard condition/compliance measure for seismic hazards, which is applicable during the design and construction of all projects that involve grading, excavation or other ground-disturbing activities. SC-GEO-1 requires implementation of the Office of Environmental Health and Safety's (OEHS) CEQA Specification Manual, Appendix G, Supplemental Geohazard Assessment Scope of Work, which outlines the procedure and scope for LAUSD geohazard assessments.

SC-GEO-1: OEHS CEQA Specification Manual, Appendix G Supplemental Geohazard Assessment Scope of Work. This document outlines the procedures and scope for LAUSD geohazard assessments.

With implementation of SC-GEO-1, potential impacts related to surface rupture hazards from a known active fault would be less than significant. No mitigation measures or further evaluation are required.

ii) Strong seismic ground shaking?

Less Than Significant Impact. The project site is located within the seismically active Southern California region. It is likely that strong ground shaking will occur within the project site and across the District in the future. As described above, in Response to Checklist Question VI.a.i, LAUSD conducts a detailed review of

⁶⁹ LAUSD School Upgrade Program Final Environmental Impact Report, September 2015, pages 5.6-27 and 5.6-28.

⁷⁰ Updated Geotechnical Investigation, Colfax Charter Elementary School Classroom Addition Project at 11724 Addison Street, Valley Village Area of Los Angeles, California, prepared for LAUSD by Geocon West, Inc., August 31, 2016, at page 5.

⁷¹ City of Los Angeles Department of City Planning, Zoning Information and Mapping System (ZIMAS). Website: zimas.lacity.org. Accessed May 2016.

⁷² LAUSD School Upgrade Program Final Environmental Impact Report, September 2015, Figure 5.6-1 – Fault Map.

⁷³ Updated Geotechnical Investigation, Colfax Charter Elementary School Classroom Addition Project at 11724 Addison Street, Valley Village Area of Los Angeles, California, prepared for LAUSD by Geocon West, Inc., August 31, 2016, at page 6.

⁷⁴ LAUSD School Upgrade Program Final Environmental Impact Report, September 2015, pages 5.6-27 and 5.6-28.

⁷⁵ *Ibid*, at pages 5.6-13 and 5.6-14.

seismic hazards as a part of the environmental review for new construction projects, which include site-specific geotechnical recommendations. With respect to all SUP projects, design and construction of new buildings would comply with seismic safety requirements of the DSA and CBC.⁷⁶ Compliance with DSA and CBC requirements, as well as implementation of SC-GEO-1, would ensure that potential hazards from strong seismic ground shaking would be less than significant. No mitigation measures or further evaluation are required.

iii) Seismic-related ground failure, including liquefaction?

Less Than Significant Impact. The project site is located within a City- and District-designated liquefaction zone.^{77,78,79} The liquefaction analysis indicates that the medium dense to dense, granular soil layers below the historic high depth to groundwater level and between depths of approximately 10 to 20 feet below the ground surface are susceptible to liquefaction by a magnitude 6.72 earthquake.⁸⁰ Nevertheless, for all SUP projects on an existing school campus with site grading or new building construction, the District conducts a geotechnical investigation, as described above, in Response to Checklist Question VI.a.i. The geotechnical evaluation will include sampling and testing of subsurface soils, an assessment of liquefaction potential, and any site-specific measures necessary to reduce liquefaction-related impacts.⁸¹ Implementation of the project would not expose people or structures to substantial hazards from seismic-related ground failure, including liquefaction, and impacts would be less than significant in this regard. No mitigation measures or further evaluation are required.

iv) Landslides?

No Impact. The project site is not located within an area identified as being susceptible to landslides, nor is the site located within a State Earthquake Induced Landslide Seismic Hazard Zone.^{82,83} Furthermore, LAUSD policy dictates that schools will not be constructed in areas that are prone to landslides. As stated above, in Response to Checklist Question VI.a.i, the District 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 measures or further evaluation are required.

⁷⁶ *Ibid*, at pages 5.6-27 and 5.8-28.

⁷⁷ *City of Los Angeles Department of City Planning, Zoning Information and Mapping System (ZIMAS)*. Website: zimas.lacity.org. Accessed May 2016.

⁷⁸ *LAUSD School Upgrade Program Final Environmental Impact Report, September 2015, Figure 5.6-2 – Liquefaction Zones*.

⁷⁹ *Updated Geotechnical Investigation, Colfax Charter Elementary School Classroom Addition Project at 11724 Addison Street, Valley Village Area of Los Angeles, California, prepared for LAUSD by Geocon West, Inc., August 31, 2016, at pages 10 and 11*.

⁸⁰ *Ibid*.

⁸¹ *LAUSD School Upgrade Program Final Environmental Impact Report, September 2015, page 5.6-30*.

⁸² *City of Los Angeles Department of City Planning, Zoning Information and Mapping System (ZIMAS)*. Website: zimas.lacity.org. Accessed May 2016.

⁸³ *LAUSD School Upgrade Program Final Environmental Impact Report, September 2015, Figure 5.6-3 – Landslide Zones*.

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

Less Than Significant Impact. Construction of the proposed project would result in ground surface disruption during excavation, grading, and trenching that would create the potential for erosion. SUP projects involving new construction may disturb substantial amounts of soil and cause extensive soil erosion. However, project-specific erosion control measures, as delineated in the Supplemental Geohazard Assessment Scope of Work, would significantly reduce project-related soil erosion. As the proposed project is greater than one acre in size, LAUSD's construction contractor would prepare and comply with a Storm Water Pollution Prevention Plan (SWPPP), which includes BMPs for erosion and sediment control.⁸⁴ Implementation of SC-GEO-1 would reduce impacts to soil erosion or the loss of top soil to less than significant levels. No mitigation measures or further evaluation are required.

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

Less Than Significant Impact. The project is being constructed on an existing, developed school campus. Soils on existing campuses have been previously graded and compacted, thereby reducing the potential for collapsible soils to be present. As such, the project will not be located on unstable collapsible soils.⁸⁵ The potential for subsidence to occur is also minimal, since there is no ongoing oil or groundwater extraction occurring in the area. As discussed above, there is a less than significant impact related to liquefaction and no impact related to landslides. As with all new classroom construction, a site-specific geotechnical evaluation will be undertaken, as delineated in the Supplemental Geohazard Assessment Scope of Work, to ensure that impacts are less than significant. Furthermore, the DSA would review and approve final construction plans. With implementation of these design practices and requirements, as well as SC-GEO-1, impacts associated with unstable geology or unstable soils would be less than significant. No mitigation measures or further evaluation are 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. The near-surface soils underlying the project site consist predominantly of silty sands, sandy silt, and sand with variable amounts of gravel and have a very low expansion potential.⁸⁶ The project is being constructed on an existing, developed school campus, with soils that have been previously graded and compacted, thereby reducing the potential for expansive soils to be present. As with all new classroom construction, site-specific geotechnical studies will be undertaken, including soil samples, to test for expansion potential, and geotechnical recommendations will be detailed, which may include ground stabilization, selection of appropriate foundation type and depths, and the selection of appropriate

⁸⁴ LAUSD School Upgrade Program Final Environmental Impact Report, September 2015, at page 5.6-31.

⁸⁵ *Ibid*, at page 5.6-32.

⁸⁶ Updated Geotechnical Investigation, Colfax Charter Elementary School Classroom Addition Project at 11724 Addison Street, Valley Village Area of Los Angeles, California, prepared for LAUSD by Geocon West, Inc., August 31, 2016, at page 4.

structural systems.⁸⁷ With implementation of these design practices and requirements, as well as SC-GEO-1, impacts associated with expansive soil would be less than significant. No mitigation measures or further evaluation are required.

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

No Impact. All SUP projects would be connected to the municipal sewer system, and no septic tanks or alternative water disposal systems would be utilized.⁸⁸ As such, there would be no impact in this regard. No mitigation measures or further evaluation are required.

VII. GREENHOUSE GAS EMISSIONS

Would the project:

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

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. Greenhouse gases (“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 (“CO₂”), methane (“CH₄”), ozone (“O₃”), water vapor, nitrous oxide (“N₂O”), hydrofluorocarbons (“HFCs”), perfluorocarbons (“PFCs”), and sulfur hexafluoride (“SF₆”). 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 on 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

⁸⁷ LAUSD School Upgrade Program Final Environmental Impact Report, September 2015, at page 5.6-33.

⁸⁸ *Ibid.*

are dispersed worldwide. As such, by their nature, project-related climate change impacts contribute cumulatively to this impact, through direct and indirect GHG emissions.⁸⁹

LAUSD has not yet adopted a numerical significance threshold for assessing impacts related to GHG emissions and has not formally adopted a local plan for reducing GHG emissions. When no guidance exists under CEQA, the lead agency may look to and assess general compliance with comparable regulatory schemes.⁹⁰ In its January 2008 CEQA and Climate Change white paper, the California Air Pollution Control Officer's Association (CAPCOA) identified a number of potential approaches for determining the significance of GHG emissions in CEQA documents. In its white paper, CAPCOA suggests making significance determinations on a case-by-case basis when no significance thresholds have been formally adopted by a lead agency.

The Office of Planning and Research released a technical advisory on CEQA and climate change that provided some guidance on assessing the significance of GHG emissions, and states that "lead agencies may undertake a project-by-project analysis, consistent with available guidance and current CEQA practice," and that while "climate change is ultimately a cumulative impact, not every individual project that emits GHGs must necessarily be found to contribute to a significant cumulative impact on the environment."⁹¹ Furthermore, the technical advisory states that "CEQA authorizes reliance on previously approved plans and mitigation programs that have adequately analyzed and mitigated GHG emissions to a less than significant level as a means to avoid or substantially reduce the cumulative impact of a project."⁹²

On December 5, 2008, the SCAQMD Governing Board adopted the staff proposal for an interim GHG significance threshold for stationary source/industrial projects where the SCAQMD is lead agency. However, the SCAQMD has yet to adopt a GHG significance threshold for land use development projects (e.g., residential/commercial projects) and formed a GHG Significance Threshold Working Group to further evaluate potential GHG significance thresholds.⁹³ The Working Group released draft guidance regarding interim CEQA GHG indicators of significance in October 2008, proposing a tiered approach whereby the level of detail and refinement needed to determine significance increases with a project's total GHG emissions. Under Tier 1, Projects that are exempt from CEQA would be less than significant. Under Tier 2, projects that are consistent with an adopted GHG reduction plan would be less than significant. Under Tier 3, non-industrial projects with 3,000 metric tons of CO₂e per year or less would be less than significant. Tier 4 uses performance standards, which requires projects to demonstrate a percent emission reduction target below an identified baseline level or an efficiency-based threshold such as GHG emissions on a per service

⁸⁹ *Ibid*, at pages 5.7-15 to 5.7-18.

⁹⁰ See *Protect Historic Amador Waterways v. Amador Water Agency* (2004) 116 Cal. App. 4th 1099, 1107 ["[A] lead agency's use of existing environmental standards in determining the significance of a project's environmental impacts is an effective means of promoting consistency in significance determinations and integrating CEQA environmental review activities with other environmental program planning and resolution."]. Lead agencies can, and often do, use regulatory agencies' performance standards. A project's compliance with these standards usually is presumed to provide an adequate level of protection for environmental resources. See, e.g., *Cadiz Land Co. v. Rail Cycle* (2000) 83 Cal.App.4th 74, 99 (upholding use of regulatory agency performance standard).

⁹¹ Governor's Office of Planning and Research, *Technical Advisory – CEQA and Climate Change: Addressing Climate Change through California Environmental Quality Act (CEQA) Review*, (2008).

⁹² Governor's Office of Planning and Research, *Technical Advisory – CEQA and Climate Change: Addressing Climate Change through California Environmental Quality Act (CEQA) Review*, (2008).

⁹³ California Air Resources Board, *Greenhouse Gases CEQA Significance Thresholds*, <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/ghg-significance-thresholds>. Accessed November 2015.

population basis. The aforementioned Working Group was inactive in 2011 through 2015 and did not formally submit the thresholds to the Governing Board for approval.

“Tier 3,” the primary tier by which SCAQMD currently determines the significance of stationary emission sources, relies on Executive Order S-3-05 as the basis for a screening level, and was established at a level that captures 90 percent of Air Basin-wide land use GHG emissions. The SCAQMD proposed a screening level of 3,000 metric tons of carbon dioxide equivalents (MTCO_{2e}) per year for commercial or mixed-use residential projects under which project impacts are considered less than significant, “to achieve the same policy objective of capturing 90 percent of the GHG emissions from new development projects in the residential/commercial sectors.”⁹⁴ In CAPCOA’s January 2008 CEQA and Climate Change white paper, 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.”⁹⁵ A 90 percent capture rate would “exclude the smallest proposed developments from potentially burdensome requirements ... to mitigate GHG emissions.”⁹⁶ The SCAQMD’s proposed screening level of 3,000 MTCO_{2e} per year is a South Coast Air Basin-specific level that would meet CAPCOA’s intent for the suggested quantitative threshold option. It should be noted that the SCAQMD has formally adopted a GHG significance threshold of 10,000 MTCO_{2e} per year for industrial/stationary source projects where the SCAQMD is the lead agency based on a 90 percent capture rate for the industrial/stationary source sector. Given the lack of a formally adopted numerical significance threshold applicable to this project, the significance of the project is evaluated based on the SCAQMD’s proposed screening level of 3,000 MTCO_{2e}.

The Project’s net increase in GHG emissions is estimated using the CalEEMod, which is a statewide land use emissions computer model designed to provide a uniform platform for government agencies, land use planners, and environmental professionals to quantify potential criteria pollutant and GHG emissions associated with both construction and operations from a variety of land use projects. CalEEMod was developed in collaboration with the air districts of California. Default data (e.g., emission factors, trip lengths, meteorology, source inventory, etc.) have been provided by the various California air districts to account for local requirements and conditions. The model is considered by the SCAQMD to be an accurate and comprehensive tool for quantifying air quality and GHG impacts from land use projects throughout California.⁹⁷

Construction emissions 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 emissions factors. The emissions estimated from the CalEEMod (Version 2013.2.2) software is based on outputs from the OFFROAD and EMFAC models, which are emissions estimation models developed by the CARB and used to calculate emissions from construction activities, including on- and off-road vehicles and equipment. The

⁹⁴ *South Coast Air Quality Management District, Board Meeting, December 5, 2008, Agenda No. 31, Interim GHG Significance Threshold Proposal – Key Issues/Comments Attachment D.*

⁹⁵ *California Air Pollution Control Officer’s Association, CEQA and Climate Change, (2008) 42-43.*

⁹⁶ *California Air Pollution Control Officer’s Association, CEQA and Climate Change, (2008) 43-44.*

⁹⁷ See <http://www.caleemod.com>.

output values used in this analysis were adjusted to be Project-specific based on equipment types and the construction schedule. These values were then applied to the same construction phasing assumptions used in the criteria pollutant analysis (see Section 3, *Air Quality*, in this Attachment B) to generate GHG emissions values for each construction year. CalEEMod outputs construction-related GHG emissions of CO₂, CH₄, N₂O, and CO_{2e}. These values are then converted to metric tons for consistency. The CO_{2e} emissions are calculated for the construction period and future Project build-out conditions in order to estimate the net change in GHG emissions from Project construction and operation. To consider Project construction GHG emissions in the larger operational context, GHG emissions from construction have been amortized over a 30-year lifetime of the Project (i.e., total construction GHG emissions were divided by 30 to determine an annual construction emissions estimate comparable to operational emissions) consistent with SCAQMD recommendations.

Operational emissions were estimated using CalEEMod for the existing site uses and the project to determine the net incremental change in GHG emissions. Mobile source emissions are based on the vehicle emission factors from EMFAC and the trip length values for the existing and Project land uses in CalEEMod, which are South Coast Air Basin-wide average trip distance values. To estimate the total vehicle miles traveled (VMT) generated by existing site and Project trips, trip generation rates provided in the Project traffic study were used.⁹⁸ The trips take into account trip reductions from internal capture from co-locating different land uses on the site and from nearby access to public transportation. Reductions in VMT are calculated based on site-specific characteristics, such as proximity to residential centers, using the equations and methods prescribed in the CAPCOA guidance document, *Quantifying Greenhouse Gas Mitigation Measures*, which provides emission reduction values for transportation characteristics and measures.⁹⁹

Implementation of the proposed project would remove existing structures on the campus, upgrade certain buildings and add new capacity for administrative and classroom uses. The proposed project would incorporate standards developed by the “Collaborative for High Performance Schools” (CHPS), with goals established for the project with respect to energy and water efficiency, drought-tolerant landscaping, and materials reuse and recycling. The newer buildings would be built using more energy efficient materials and equipment. The Colfax Charter Elementary School Project’s new lighting and HVAC systems would comply with and/or improve upon the applicable energy efficiency requirements of the Title 24 California Building Standards Code, including Title 24, Part 11 (the California Green Building Standards (CALGreen) Code). The Colfax Charter Elementary School Project would install energy efficient lighting, although the area of light coverage would be greater given the increased floor area. In addition, student enrollment is expected to increase by approximately 160 students resulting in additional vehicle trips to and from the site.

As a result of the increased vehicle trips and square footage, the Colfax Charter Elementary School Project is estimated to result in an increase of approximately 401 MTCO_{2e} per year. When combined with the amortized construction GHG emissions, the incremental increase would be approximately 437 MTCO_{2e} per year. The increase in GHG emissions resulting from the Colfax Charter Elementary School Project would remain below significance thresholds as shown in **Table B-5, Annual Greenhouse Gas Emissions**. Therefore, based on the above analysis, construction and operation of the Colfax Charter Elementary School Project would result in less than significant GHG impacts and no mitigation is required.

⁹⁸ Raju Associates Inc., *Traffic Study for the Colfax Elementary School Classroom Addition Project*, October 2016.

⁹⁹ California Air Pollution Control Officers Association, *Quantifying Greenhouse Gas Mitigation Measures*, (2010).

Table B-5

Annual Greenhouse Gas Emissions

Emissions Sources	Project
Proposed Project Operational (Opening Year 2020)	
On Road Mobile Sources	204
Area	<1
Electricity	142
Natural Gas	18
Water Conveyance	25
Waste	12
Proposed Subtotal	401
Construction (Amortized)	36
Total Annual Emissions	437
Significance Threshold	3,000
Over/(Under)	(2,563)
Exceeds Threshold?	No

^a Totals may not add up exactly due to rounding in the modeling calculations

Source: PCR 2016.

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

Less Than Significant Impact With Mitigation Incorporated. 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 Southern California Association of Government’s 2012 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), California Assembly Bill 32, California Air Resources Board 2008 Scoping Plan, and other statewide strategies to reduce GHG emissions.¹⁰⁰ Development of the proposed project would fulfill the educational capacity needs of the local community. The project would increase the number of student trips to the school by less than 25% over current numbers. Greenhouse gas emissions would increase by a minimal amount and the project would not conflict with the goals of the 2012 RTP/SCS.

SUP-related projects, including the proposed project, would comply with GHG emission reduction measures. In furtherance of the 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.¹⁰¹ With respect to all SUP projects, implementation of

¹⁰⁰ LAUSD School Upgrade Program Final Environmental Impact Report, September 2015, at pages 5.7-18 to 5.7-19.

¹⁰¹ Ibid.

LAUSD's School Design Guide and SCs GHG-1 through GHG-5 would ensure that the proposed project would not conflict with any plans, policies or regulations adopted for the purpose of reducing GHG emissions.¹⁰²

- 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 during the rainy season.
- SC-GHG-4:** LAUSD shall develop a water budget for landscape (both non-recreational and recreational) and ornamental water use to conform to the local water efficient landscape ordinance. If no local ordinance is applicable, then use the landscape and ornamental budget outlined by the Department of California 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.

With implementation of LAUSD's School Design Guide and SCs GHG-1 through GHG-5, potential impacts related to the conflicts with plans policies or regulations adopted for the purpose of reducing GHG emissions would be less than significant. No mitigation measures or further evaluation are required.

VIII. HAZARDS AND HAZARDOUS MATERIALS

The following evaluation of hazards and hazardous materials is based, in part, on the technical report for the project entitled "Phase I Environmental Site Assessment Colfax Elementary School, 11724 Addison Street, Los Angeles, California" ("Phase I ESA") prepared for LAUSD by WorleyParsons, on January 21, 2016. The Phase I ESA, which is included as Appendix E of this MND, evaluated potential recognized environmental concerns (REC) at Colfax Charter Elementary School and in the project vicinity.

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. As with most SUP projects, construction and operation of the proposed project would involve the transport, storage, use and/or disposal of limited quantities of hazardous

¹⁰² *Ibid*, at page 5.7-11.

materials, such as fuels, solvents, degreasers and paints. The use of these materials during project construction would be short-term in nature and would occur in accordance with standard construction practices, as well as with applicable federal, state, and local regulations. Potentially hazardous materials would be contained, stored, and used in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations. Examples of such activities include fueling and servicing construction equipment, application of paints and other coatings, and demolition of buildings that contain asbestos or lead-based paint. Project construction would be temporary in nature, and on-site activities would be governed by existing regulations of several agencies.¹⁰³

An important component of the SUP is to eliminate hazards associated with asbestos and lead-based paint in existing buildings which would be demolished, as would be the case for 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.¹⁰⁴ Compliance with asbestos-related regulations and requirements is the responsibility of LAUSD's FETU, which 1) identifies ACM; 2) abates ACM (including repair and removal of asbestos); and 3) prepares project-specific contract specifications and inspections. The District maintains a listing of school-owned buildings that could contain ACM, and all projects at existing schools must be reviewed for potential impacts to ACM prior to project commencement. All materials that contain ACM would be removed by licensed asbestos abatement contractors following specific handling procedures. In addition, LAUSD Section 13280 (Asbestos Abatement and Asbestos Related Disturbance, November 21, 2003) will be implemented as needed.¹⁰⁵

Similarly, the District also has protocols in place for the removal of lead-based paint (LBP) and building materials, in compliance with applicable health and safety and hazardous materials regulations.¹⁰⁶ All projects at existing school sites must be reviewed by LAUSD's FETU for impacts to LBP prior to project commencement, as all coated surfaces (paint, varnish, or glazed) are assumed to contain lead and must be abated by properly trained contractors.¹⁰⁷ Specific procedures for the handling of building materials containing LBP are established by the District. In addition, LAUSD Section 13282 (Lead Abatement and Lead Related Construction Work, March 15, 2007) and LAUSD Section 13614 (Abatement of Hazardous Materials, July 7, 2003) will also be implemented as appropriate.¹⁰⁸

Long-term operations of the proposed addition would involve very little transport, storage, use, or disposal of hazardous materials and substances.¹⁰⁹ The Office of Environmental Health and Safety developed and implemented a Chemical Hygiene Plan to minimize employee and student exposure to hazardous chemicals in schools with laboratories.¹¹⁰ 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

¹⁰³ *Ibid*, at page 5.8-34.

¹⁰⁴ *Ibid*, at page 5.8-35 to 5.8-36.

¹⁰⁵ *Ibid*, at page 5.8-36.

¹⁰⁶ *Ibid*, at pages 5.8-36 to 5.8-38.

¹⁰⁷ *Ibid*, at page 5.8-37.

¹⁰⁸ *Ibid*, at pages 5.8-38 and 5.8-39.

¹⁰⁹ *Ibid*, at page 5.8-34.

¹¹⁰ *Los Angeles Unified School District Reference Guide: Chemical Safety Coordinators. Website: <http://achieve.lausd.net/Page/2797>. Accessed November 2016.*

material management, conducting employee trainings, and establishing 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.¹¹¹ Such requirements would be incorporated into the design and operation of the project, such as providing for and maintaining appropriate storage areas for hazardous materials and installing or affixing appropriate warning signs and labels.¹¹² 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 measures or further evaluation are required.

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

Less Than Significant Impact. As with all SUP-related projects, the proposed project may require the use of hazardous materials in small quantities during construction and operation of new facilities. As discussed in Response to Checklist Question VIII.a, all materials and substances would be subject to federal, state, and local health and safety requirements. 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.¹¹³ Based on the Phase I ESA, the potential presence of LBP residue, organochlorinated pesticides (OCPs), arsenic in soil, and ACM in the site building materials constitute RECs. Based on the findings of the Phase I ESA, no other RECs, historic RECs, controlled RECs, or de minimus conditions have been identified on the project site or directly adjoining properties.^{114,115} Compliance with the above mentioned regulations and requirements listed in response to Checklist Question VIII.a ensures that the proposed project would not create a significant hazard to the public or the environment through release of hazardous materials into the environment. No mitigation measures or further evaluation are required.

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

Less Than Significant Impact. The SUP covers the entire District and over 600 schools, including the Colfax Charter Elementary School. Individual projects implemented under the SUP would be school-related and

¹¹¹ LAUSD School Upgrade Program Final Environmental Impact Report, September 2015, at page 5.8-34.

¹¹² *Ibid.*

¹¹³ *Ibid.*, at page 5.8-43.

¹¹⁴ Phase I Environmental Site Assessment Colfax Elementary School, 11724 Addison Street, Los Angeles, California, prepared for LAUSD by WorleyParsons, on January 21, 2016, at pages 2 and 3.

¹¹⁵ A de minimis condition generally does not present a threat to human health or the environment, nor would it be classified as an REC.

would not emit hazardous materials or handle significant quantities of hazardous or acutely hazardous materials, substances or waste.¹¹⁶

Construction

As described in the Phase I ESA, the existing site conditions indicate the potential presence of LBP, OCPs, and ACM, which would constitute a REC.¹¹⁷ There is potential for earthwork, grading, and installation activities during project construction to release hazardous materials into the surrounding environment. Project construction would involve the temporary use of hazardous substances. All materials would be used, stored, and disposed of in accordance with applicable laws and regulations and manufacturers' instructions. Furthermore, any emissions from the use of such materials would be minimal and localized to the project site. In addition, if contaminants that could become airborne during demolition and hauling, such as ACM and LBP, are present on a project site, they would be removed in accordance with all applicable requirements prior to demolition activities.¹¹⁸ As a result, project construction would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials, and a less than significant impact would result.

Operation

Hazardous materials expected to be used in the operation of District schools would be associated with janitorial, maintenance, and repair activities. These materials will be used in small quantities and stored in compliance with applicable federal, state and local requirements.¹¹⁹ Therefore, emission impacts from existing or proposed schools within one-quarter mile of other existing schools would be less than significant. No mitigation measures or further evaluation are required.

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

No Impact. Government Code Section 65962.5, amended in 1992, requires the California Environmental Protection Agency (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 the Department of Toxic Substances Control, the State Water Board, and CalEPA. The DTSC maintains the EnviroStor database, which includes sites on the Cortese List and also identifies potentially hazardous sites where cleanup actions (such as a removal action) or extensive investigations are planned or have occurred. The database provides a listing of Federal Superfund sites ("National Priorities List"); State Response sites; Voluntary Cleanup sites; and School Cleanup sites. Review of the EnviroStor database showed that the project site is not identified on

¹¹⁶ LAUSD School Upgrade Program Final Environmental Impact Report, September 2015, at page 5.8-44.

¹¹⁷ Phase I Environmental Site Assessment Colfax Elementary School, 11724 Addison Street, Los Angeles, California, prepared for LAUSD by WorleyParsons, on January 21, 2016, at page 2.

¹¹⁸ LAUSD School Upgrade Program Final Environmental Impact Report, September 2015, at page 5.8-44.

¹¹⁹ *Ibid.*

any of the above database lists.¹²⁰ Based on the Phase I ESA, the project site had been listed on the RCRA-LQF, FINDS, FTTS, HIST FTTS, and HAZNET databases four times from 1997 to 2008.¹²¹ The listings indicate the presence of lead, PCBs, organic and inorganic solid waste, and asbestos. During project construction, if these compounds are still present on the project site, they will be identified and abated by LAUSD's FETU, as stated in Response to Checklist Question VIII.a. Furthermore, no existing LAUSD schools are currently included on a list of hazardous materials sites.¹²² As such, there would be no impact in this regard. No mitigation measures or further evaluation are required.

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

No Impact. The project site is not located within an airport land use plan, nor is it located within two miles of a public or public use airport. The closest airport is Bob Hope Airport, located approximately four miles from the project site. Furthermore, projects conducted on existing campuses that do not involve the acquisition of new property, such as the proposed project, would not need to be reviewed for airport safety or noise.¹²³ As such the project would not result in a safety hazard for people residing or working in the project area, and no impact would occur in this regard. No mitigation measures or further evaluation are 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. The project site is not located within the vicinity of a private airstrip, or heliport or helistop. The nearest private airstrip, heliport, or helistop is the NBC-TV Heliport – 8CL3, located at 3000 W. Alameda Street in Burbank, approximately three miles east of the project site. SUP projects would not create any new safety hazards associated with heliport operations, and no impact would occur in this regard.¹²⁴ No mitigation measures or further evaluation are required.

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

No Impact. Colfax Charter Elementary School is located in an established suburban area that is well served by a roadway network. The streets bordering the school are not designated as Selected Disaster Routes.¹²⁵

¹²⁰ California Department of Toxic Substances Control, EnviroStor database search. Website: <http://www.envirostor.dtsc.ca.gov/public/>. Accessed May 2016.

¹²¹ Phase I Environmental Site Assessment Colfax Elementary School, 11724 Addison Street, Los Angeles, California, prepared for LAUSD by WorleyParsons, on January 21, 2016, at pages 16 to 18.

¹²² LAUSD School Upgrade Program Final Environmental Impact Report, September 2015, at pages 5.8-45.

¹²³ *Ibid*, at pages 5.8-44 and 5.8-45.

¹²⁴ *Ibid*.

¹²⁵ City of Los Angeles Department of Planning, General Plan Safety Element, Exhibit H – Critical Facilities and Lifeline Systems in the City of Los Angeles, November 26, 1996.

The proposed project does not include any uses or design features that would result in interference with any adopted emergency response plan or emergency evacuation plan. In addition, LAUSD PDFs require adequate emergency access, and that each new facility complies with adopted emergency response and evacuation plans, as well as conforming to the District's emergency response plans and protocols during construction and operation.¹²⁶ Staging areas for construction would be located on school property; therefore, emergency access to the site would not be adversely impacted during construction. The proposed project would not impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan, and no impact would occur in this regard. No mitigation measures or further evaluation are required.

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

No Impact. The proposed project would not expose people or structures to the risk of wildland fires. The project site is located in a developed, suburban area of the City of Los Angeles. The surrounding area does not contain highly flammable brush, grass, or trees. The project site is not located within a Wildfire Hazard Area as identified by the City of Los Angeles.^{127,128} Furthermore, the proposed project would comply with local fire code requirements and California Department of Education requirements, thereby ensuring that the project would not expose people or structures to a significant risk involving wildland fires. No impact would occur in this regard. No mitigation measures or further evaluation are required.

IX. HYDROLOGY AND WATER QUALITY

The following evaluation of hydrology and water quality is based, in part, on the technical report for the project entitled Updated Geotechnical Investigation, Colfax Charter Elementary School Classroom Addition Project at 11724 Addison Street, Valley Village Area of Los Angeles, California ("Geotechnical Report") prepared for LAUSD by Geocon West, Inc. on August 31, 2016. This Geotechnical Report, which is included as Appendix D-1 of this MND, evaluates project site hydrology and stormwater infiltration at Colfax Charter Elementary School and in the project vicinity. The Geotechnical Report reviewed "Geotechnical Evaluation, Colfax Charter Elementary School Modernization, 11724 Addison Street, Valley Village, California" prepared for LAUSD by Ninyo & Moore on May 3, 2016. The Ninyo & Moore Geotechnical Evaluation is included as Appendix D-2 of this MND.

¹²⁶ LAUSD School Upgrade Program Final Environmental Impact Report, September 2015, at pages 5.8-47 and 5.8-48.

¹²⁷ City of Los Angeles Department of Planning, General Plan Safety Element, Exhibit D – Selected Wildfire Hazard Areas in the City of Los Angeles, November 26, 1996.

¹²⁸ City of Los Angeles Department of City Planning, Zoning Information and Mapping System (ZIMAS). Website: zimas.lacity.org. Accessed May 2016.

Would the project:

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

Less Than Significant Impact With Mitigation Incorporated. The proposed project would not violate any water quality standards or waste discharge requirements. Project construction would require earthwork activities, including limited grading and minor excavation of the project site, which would expose soils for a limited time and could allow for possible erosion, particularly during precipitation events. However, all earthwork activities would be completed in accordance with LAUSD Standards 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 one acre, as would occur for the proposed project. All new construction projects would be required to prepare and implement a sediment and erosion control plan that follow the BMPs outlined by the State Water Resources Control Board to comply with a Construction General permit, including development of a SWPPP, as required by the Regional Water Quality Control Board's National Pollutant Discharge Elimination System.¹²⁹ LAUSD Standard Conditions applicable to each SUP-related project include SC-HWQ-1, which requires compliance with LAUSD's Stormwater Technical Manual and the District's General Construction Activity Permit.¹³⁰

SC-HWQ-1: Stormwater Technical Manual. This manual establishes design requirements and provides guidance for the cost-effective improvement of water quality in new and significantly redeveloped LAUSD school sites. These guidelines are intended to improve water quality and mitigate potential impacts 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.

The District developed a program-wide SWPPP in 2005, with updates completed in 2007 and 2009. LAUSD's construction contracting protocol, for new or existing sites that would undergo land disturbance, provide BMPs required to prevent or minimize stormwater pollution, including submission of a SWPPP.¹³¹ With adherence to LAUSD standards and applicable regulations, adverse impacts to stormwater quality would be avoided through implementation of BMPs recommended for such construction activity.¹³² As such, LAUSD's construction site stormwater runoff control programs and SCs, intended for the SUP, in the aggregate, would mitigate the impact of all construction under the SUP. Therefore, project construction impacts would be less than significant.

New projects operated under the SUP would not produce or discharge industrial wastes to surface or groundwater.¹³³ Per the LAUSD Stormwater Technical Manual for Low Impact Development (LID), the site would be designed to meet the intent of the SUSMP for Los Angeles County. LID is a stormwater management strategy that mitigates the impacts of runoff and stormwater pollution using BMPs that remove or treat runoff pollution at the source. LID is implemented by: 1) infiltration and/or bioretention, or 2)

¹²⁹ LAUSD School Upgrade Program Final Environmental Impact Report, September 2015, at pages 5.9-25 and 5.9-26.

¹³⁰ *Ibid*, at pages 5.9-8 to 5.9-13.

¹³¹ *Ibid*, at pages 5.9-25 to 5.9-26.

¹³² *Ibid*, at pages 5.9-8 and 5.9-13.

¹³³ *Ibid*, at pages 5.9-25 to 5.9-26.

stormwater runoff harvest and use. The Geotechnical Report states that a stormwater infiltration system is considered feasible for the project.¹³⁴ The infiltration system should be located such that the closest distance between an adjacent foundation is at least 10 feet in all directions from the zone of saturation. Subsequent to the placement of the infiltration system, it is acceptable to backfill the resulting void space between the excavation sidewalls and the infiltration system with minimum two-sack slurry, provided the slurry is not placed in the infiltration zone.¹³⁵ With respect to operation of the proposed project, retention basins of sufficient size will be provided to retain stormwater runoff on-site and shall be properly located to collect all tributary site runoff. Where retention of stormwater runoff on-site is not feasible due to site constraints, runoff will be conveyed through surface flow via swales or pipes to a collective drainage system.

Incorporation of LAUSD standards and compliance with applicable laws and regulations during project construction and operation would ensure that impacts associated with water quality standards or waste discharge requirements would be less than significant. No mitigation measures or further evaluation are required.

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

No Impact. The Los Angeles Department of Water and Power (“LADWP”) is the water purveyor for the City of Los Angeles. Water is supplied to the City from three primary sources, including local groundwater. Based on the City’s 2014-2015 Urban Water Management Plan (UWMP), LADWP had an available water supply of roughly 611,800 acre-feet, with approximately 18 percent coming from local groundwater.¹³⁶ Although urban open space does provide for some infiltration to smaller unconfined aquifers, the majority of groundwater recharge in the region occurs via stormwater runoff from nearby mountain ranges. Groundwater levels in the City are also maintained through an active process via spreading grounds and recharge basins. The project site is not an area identified as being important to groundwater recharge. Additionally, no groundwater production wells are located in the vicinity of the project site. Furthermore, the SUP is not growth inducing, so the water currently in use by the District, including groundwater, is based on the number of existing students. As such, there is no growth-induced impact to groundwater.¹³⁷

SUP-related projects would not result in any substantial changes in the quantity of groundwater supplies. Furthermore, no groundwater extraction activities would occur under the SUP or the proposed project, nor would any wells be constructed. The project would replace the existing impervious surfaces with another

¹³⁴ Updated Geotechnical Investigation, Colfax Charter Elementary School Classroom Addition Project at 11724 Addison Street, Valley Village Area of Los Angeles, California, prepared for LAUSD by Geocon West, Inc., August 31, 2016, at page 16.

¹³⁵ Ibid, at pages 29 and 30.

¹³⁶ Los Angeles Department of Water and Power, 2015 Urban Water Management Plan, Exhibit ES-S – Service Area Reliability Assessment for Average Weather Year, adopted July 1, 2016; https://www.ladwp.com/cs/idcplg?ldcService=GET_FILE&dDocName=QOELLADWP005416&RevisionSelectionMethod=LatestReleased. Accessed August 15, 2016.

¹³⁷ LAUSD School Upgrade Program Final Environmental Impact Report, September 2015, at page 5.9-27.

set of impervious surfaces. As such, compliance with applicable laws, regulations, and LAUSD Standards during project construction and operation would ensure that there would be no impacts associated with groundwater supplies. No mitigation measures or further evaluation are required.

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

Less Than Significant Impact. The proposed project would not substantially alter drainage patterns of the site. No streams or rivers are located on or near the project site; therefore, the proposed project would not result in the alteration of the course of a stream or river. Since the project site is located in an urbanized area, drainage patterns are well established, resulting in low potential for drainage alteration. During construction of the project, there would be soil disturbance associated with earthwork activities. Such activities could potentially lead to wind or water erosion. However, soils movement would be controlled with implementation of a site-specific SWPPP and utilization of applicable BMPs during project construction activities.¹³⁸

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 a 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.¹³⁹

Compliance with applicable laws, regulations and LAUSD Standards during project construction and operation would ensure that impacts associated with drainage and erosion are less than significant. No mitigation measures or further evaluation are required.

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

Less Than Significant Impact. Existing drainage sheet flows southeasterly from the project site and is directed into the surrounding street storm drains. There are a few catch basins at the north area of the Campus that discharge to Addison Street via curb drains. The Project will include the installation of two percolation chamber systems. Percolation Field 1 will be located within the interior portion of the elementary school yard playfield. Water from the Kindergarten building roof and surrounding new pavement will be conveyed to the chambers. The excess stormwater would be discharged via an overflow pipe through the curb southwest at Morella Avenue. Percolation Field 2 will be located within the southern

¹³⁸ LAUSD School Upgrade Program Final Environmental Impact Report, September 2015, at pages 5.9-27 to 5.9-28.

¹³⁹ *Ibid.*

portion of the new parking lot. Water from the new building roof and surrounding new pavement will be conveyed to the chambers. The excess stormwater would be discharged via an overflow pipe through the curb southeast at Colfax Avenue.¹⁴⁰ Implementation of the project would not significantly alter the existing drainage pattern. While the project site is under construction, the rate and amount of surface runoff generated at the project site could fluctuate. However, erosion control best management practices will be implemented in accordance with the stormwater pollution control plan.¹⁴¹ In addition, the construction period is short-term, and incorporation of LAUSD Standards and compliance with the applicable regulations would preclude fluctuations that result in flooding.

Following construction of the project, drainage from the project site in excess of a 0.75 inch storm event would continue to flow into the surrounding street storm drains. The capture and treat percolation chambers would decrease drainage from the project site. Therefore, implementation of the proposed project would not result in a significant increase in stormwater runoff from the site. The project would not increase the risk of flooding in the surrounding area. LAUSD's construction contractor would comply with applicable ordinances regulating drainage improvements and grading plans as they relate to construction of on-site improvements that affect drainage.¹⁴² In addition, the District would incorporate LAUSD and CHPS standards with respect to controlling runoff, as stated in Response to Checklist Question IX.c. As such, the proposed project would not adversely affect the local drainage system in a manner that would result in substantial flooding on- or off-site, and impacts would be less than significant. No mitigation measures or further evaluation are 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. Projects on existing District campuses would include stormwater BMPs, as required. These BMPs would be adequately designed to accommodate site runoff so that downstream storm drain facilities would not be adversely affected. LAUSD would comply with California Government Code 53097 during the implementation of SUP projects, thereby ensuring that school projects would not have an adverse effect on local drainage systems.¹⁴³ In addition, the District would incorporate LAUSD and CHPS standards with respect to controlling runoff, as stated in Response to Checklist Question IX.c. As such, impacts with respect to runoff volumes would be less than significant. No mitigation measures or further evaluation are required.

f) Otherwise substantially degrade water quality?

Less Than Significant Impact. The proposed project would not degrade water quality. The proposed project would require limited grading and other construction activities that may cause deterioration of water quality if sediments or construction-related pollutants wash into the storm drain system. Additionally,

¹⁴⁰ *Design Development Design Report, Los Angeles Unified School District, Colfax Charter Elementary School, Classroom Addition Project, April 25, 2016, pages 2-3.*

¹⁴¹ *Design Development Colfax Charter Elementary School Classroom Addition Project, Erosion Control Plan, April 25, 2016*

¹⁴² *California Government Code, Section 53097.*

¹⁴³ *LAUSD School Upgrade Program Final Environmental Impact Report, September 2015, at page 5.9-29.*

during operation of the school, sources of non-point source or “storm water” pollution from vehicular related contaminants may wash into the drainage system during wet weather. The proposed project would be constructed in an area that is developed and currently adding non-point-source pollutants to storm water runoff. LAUSD incorporates construction BMPs into all new construction projects, and District construction contractors would comply with National Pollution Discharge Elimination System (NPDES) regulations and prepare a SWPPP. With incorporation of LAUSD and CHPS Standards, the proposed project would not substantially increase pollutants.¹⁴⁴ As such, the project would not substantially degrade water quality, and impacts would be less than significant. No mitigation measures or further evaluation are required.

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

No Impact. No residential development is planned as part of any SUP-related projects, including the proposed project.¹⁴⁵ The proposed project site is not located within a 100-year flood hazard area.¹⁴⁶ The Federal Emergency Management Agency (FEMA) classifies the site as Zone X, which means it has a less than 0.2 percent annual probability of flooding.¹⁴⁷ In addition, the site is not within a City of Los Angeles Safety Element Inundation Zone.¹⁴⁸ As such, there would be no impact in this regard. No mitigation measures or further evaluation are required.

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

No Impact. The proposed project site is not located within a 100-year flood hazard area.¹⁴⁹ FEMA classifies the site as Zone X, which means it has a less than 0.2 percent annual probability of flooding.¹⁵⁰ In addition, the site is not within a City of Los Angeles Safety Element Inundation Zone.¹⁵¹ As such, there would be no impact in this regard. No mitigation measures or further evaluation are required.

¹⁴⁴ *Ibid*, at pages 5.9-30.

¹⁴⁵ *Ibid*.

¹⁴⁶ *Phase I Environmental Site Assessment Colfax Elementary School, 11724 Addison Street, Los Angeles, California, prepared for LAUSD by WorleyParsons, on January 21, 2016, at page 14.*

¹⁴⁷ *Updated Geotechnical Investigation, Colfax Charter Elementary School Classroom Addition Project at 11724 Addison Street, Valley Village Area of Los Angeles, California, prepared for LAUSD by Geocon West, Inc., August 31, 2016, at page 12.*

¹⁴⁸ *City of Los Angeles Department of Planning, General Plan Safety Element, Exhibit G – Inundation and Tsunami Hazard Areas in the City of Los Angeles, November 26, 1996.*

¹⁴⁹ *Phase I Environmental Site Assessment Colfax Elementary School, 11724 Addison Street, Los Angeles, California, prepared for LAUSD by WorleyParsons, on January 21, 2016, at page 14.*

¹⁵⁰ *Updated Geotechnical Investigation, Colfax Charter Elementary School Classroom Addition Project at 11724 Addison Street, Valley Village Area of Los Angeles, California, prepared for LAUSD by Geocon West, Inc., August 31, 2016, at page 12.*

¹⁵¹ *City of Los Angeles Department of Planning, General Plan Safety Element, Exhibit G – Inundation and Tsunami Hazard Areas in the City of Los Angeles, November 26, 1996.*

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. Earthquake-induced flooding is inundation caused by failure old dams or other water-retaining structures due to earthquakes. The Los Angeles County Safety Element indicates that the site is located within the Hansen Dam and Lopez Dam inundation areas. However, these reservoirs, as well as others in California, are continually monitored by various governmental agencies to guard against the threat of dam failure. Current design, construction practices, and ongoing programs of review, modification, or total reconstruction of existing dams are intended to ensure that all dams are capable of withstanding the maximum considered earthquake for the site. Therefore, the potential for inundation at the site as a result of an earthquake-induced dam failure is considered low.¹⁵² As such, there would be no impact in this regard. No mitigation measures or further evaluation are required.

j) Inundation by seiche, tsunami, or mudflow?

No Impact. A seiche is an oscillation of a body of water in an enclosed or semi-enclosed basin, such as a reservoir, harbor, lake, or storage tank. The Hansen and Lopez Dams are located near the site, however, the potential for seiche induced inundation of the site is unlikely.¹⁵³ A tsunami is a great sea wave, commonly referred to as a tidal wave, produced by a significant disturbance undersea, such as a tectonic displacement of sea floor associated with large, shallow earthquakes. The project site is not located within a coastal area and is located approximately 12 miles from the Pacific Ocean, is at an elevation of approximately 632 feet above mean sea level, and is further separated from the Pacific Ocean by the Santa Monica Mountains.^{154,155} As such, there is no potential for a tsunami to affect the site. Mudflows occur as a result of downslope movement of soil and/or rock under the influence of gravity. There are no nearby slopes which could release mud or rock onto the project site, so there is no potential for a mudflow to affect the site. As such, there would be no impact to the project from a seiche, tsunami or mudflow. No mitigation measures or further evaluation are required.

X. LAND USE AND PLANNING

Would the project:

a) Physically divide an established community?

No Impact. As provided in the Program EIR, new construction projects would be located on existing, developed school campuses.¹⁵⁶ Projects on existing school campuses would not divide established

¹⁵² *Ibid.*

¹⁵³ *Updated Geotechnical Investigation, Colfax Charter Elementary School Classroom Addition Project at 11724 Addison Street, Valley Village Area of Los Angeles, California, prepared for LAUSD by Geocon West, Inc., August 31, 2016, at page 12.*

¹⁵⁴ *Google Earth.*

¹⁵⁵ *Updated Geotechnical Investigation, Colfax Charter Elementary School Classroom Addition Project at 11724 Addison Street, Valley Village Area of Los Angeles, California, prepared for LAUSD by Geocon West, Inc., August 31, 2016, at page 12.*

¹⁵⁶ *LAUSD School Upgrade Program Final Environmental Impact Report, September 2015, at page 5.10-12.*

communities surrounding the schools, and no impact would occur. No mitigation measures or further evaluation are required.

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

No Impact. The project site is zoned PF-1VL (Public Facilities – Height District 1 – Very Limited), and has a corresponding General Plan land use designation of Public Facilities. The project would not conflict with any applicable land use plan, policy or regulation adopted for the purpose of avoiding or mitigating an environmental effect, as implementation of the project would be in accordance with the existing zoning designation. Furthermore, with respect to all SUP projects, the Program EIR demonstrates its consistency with selected goals of the Southern California Association of Governments 2012 Regional Transportation Plan/Sustainable Communities Strategy.¹⁵⁷ Therefore, there would be no impact in this regard, as a result of project implementation. No mitigation measures or further evaluation are required.

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

No Impact. As provided in the Program EIR, no habitat reserves established under a habitat conservation plan or natural community are located within the District.¹⁵⁸ Therefore, there would be no conflict with such plans, and no impact would occur as a result of project implementation. No mitigation measures or further evaluation are required.

XI. MINERAL RESOURCES

Would the project:

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

No Impact. The project is not located within an area designated as a mineral resource producing zone. Furthermore, the project would occur at an existing school, and there are no mining sites located on District campuses.¹⁵⁹ Therefore, no impact to mineral resources would occur. No mitigation measures or further evaluation are required.

¹⁵⁷ *Ibid*, at pages 5.10-12 to 5.10-14.

¹⁵⁸ *Ibid*, at pages 5.10-14.

¹⁵⁹ *Ibid*, at pages 5.11-9 and Figure 5.11-1, Mineral Zones.

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

No Impact. As discussed in Response to Checklist Question XI.a, there are no mineral resource recovery sites located on existing school campuses, nor do mineral extraction operations occur on District property. Therefore, the project would not result in the loss of availability of a known mineral resource or a mineral resource recovery site, and no impact would occur. No mitigation measures or further evaluation are required.

XII. NOISE

Would the project result in:

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

Less Than Significant Impact With Mitigation Incorporated. Noise is defined as unwanted sound. But not all unwanted sound rises to the level of a potentially significant environmental impact. To differentiate unwanted sound from potentially significant noise impacts, the City has established noise regulations that take into account noise-sensitive land uses. The following analysis evaluates the potential noise impacts at nearby noise-sensitive land uses resulting from construction and operation of the project. As discussed in detail in the following section, implementation of LAUSD SCs would ensure a less than significant impact with respect to construction noise.

Applicable Noise Regulations

The District uses the noise standards of the municipality where a project is located for each site-specific CEQA analysis.¹⁶⁰ Los Angeles Municipal Code (LAMC) Section XI, *Noise Regulation*, establishes regulations regarding allowable increases in noise levels as a result of project implementation, both in terms of long-term operation and short-term construction activities.

The City Noise Regulation establishes acceptable ambient sound levels to regulate intrusive noises (e.g., stationary mechanical equipment and vehicles other than those traveling on public streets) within specific land use zones. In accordance with the Noise Regulation, a noise level increase of 5 dBA over the existing average ambient noise level at an adjacent property line is considered a noise violation. This standard applies to all noise sources except vehicles traveling on public streets and construction noise.

The ambient noise, as defined by the Noise Regulation, is the measured noise level averaged over a period of at least 15 minutes, $L_{eq(15\text{-minute})}$. The baseline ambient noise shall be the actual measured ambient noise level or the City's presumed ambient noise level, whichever is greater. In cases in which the actual measured ambient noise level is not known, the City's presumed ambient levels will be used as the baseline. The City's

¹⁶⁰ *Ibid*, at page 5.12-25.

presumed daytime (7:00 A.M. to 10:00 P.M.) minimum ambient noise level for properties zoned residential is 50 dBA, while the nighttime (10:00 P.M. to 7:00 A.M.) presumed minimum ambient noise level is 40 dBA.¹⁶¹ To account for people's increased tolerance for short-duration noise events, the Noise Regulation provides a 5 dBA allowance for a noise source occurring more than five but less than fifteen minutes in any one-hour period and an additional 5 dBA allowance (total of 10 dBA) for a noise source occurring five minutes or less in any one-hour period.¹⁶²

Section 112.03 of the LAMC limits noise levels generated by construction equipment to 75 dBA, as measured at a distance of 50 feet from the source, when construction activities are located within 500 feet of a residential zone. Compliance with this standard is only required where "technically feasible."¹⁶³ In addition, the LAMC prohibits construction between the hours of 9:00 P.M. and 7:00 A.M. Monday through Friday, 6:00 P.M. and 8:00 A.M. on Saturday, and at any time on Sunday or national holiday.

Therefore, the project would result in a significant noise impact regarding nearby sensitive uses if:

- Construction-related noise levels exceed 75 dBA at distance of 50 feet from equipment when construction activities are located within 500 feet of a residential area unless technically feasible mitigation measures are incorporated;
- Off-site project-related construction traffic causes the exterior ambient noise level to increase by 5 dBA or more at a noise-sensitive use, as measured at the property line of any sensitive use

Existing Conditions

Schools can generate noise from sports events, athletic fields, playgrounds and parking lot activity, and some of these features may potentially cause noise increases at nearby receptors, as schools are typically located in residential areas.¹⁶⁴ As described in Attachment A, *Project Description*, the project site is bordered on the north by Addison Street, on the east by Colfax Avenue, on the south by Huston Street, and on the west by Morella Avenue. The school is predominantly surrounded by suburban single-family residential uses on all sides, as well as some multi-family uses. Faith Presbyterian Church and an associated surface parking lot are located at the northeast corner of Addison Street and Colfax Avenue. Colfax Charter Elementary School itself is considered a sensitive receptor. Existing noise sensitive uses within 500 feet of the project site include the following:

- Single-Family Residential Uses: Located to the north, west, east, and south of Colfax Charter Elementary School and facing the school entrance along Addison Street.
- Multi-Family Residential Uses: Located to the southwestern corner of Colfax Avenue and Hesby Street.
- Faith Presbyterian Church: Located at the northeast corner of Addison Street and Colfax Avenue.

¹⁶¹ *Los Angeles Municipal Code, Chapter XI, Article I, Section 111.03.*

¹⁶² *Los Angeles Municipal Code, Chapter XI, Article I, Section 111.02-(b).*

¹⁶³ *In accordance with the City of Los Angeles Noise Ordinances, "technically feasible" means that the established noise limitations cannot be complied with at a project site, despite the use of mufflers, shields, sound barriers, and/or other noise reduction devices or techniques employed during the operation of equipment.*

¹⁶⁴ *LAUSD School Upgrade Program Final Environmental Impact Report, September 2015, at page 5.12-26.*

To quantify the existing noise environment, long-term measurements were conducted at Locations R1 and R2 and short-term (15-minute) measurements during daytime hours were recorded at Locations R3 and R4, as shown on **Figure B-1, Noise Measurement Locations**, and described below:

- **Measurement Location R1:** on the eastern boundary of the project site along Colfax Avenue; representative of the noise environment of the project site and single-family residences along Colfax Avenue. Ambient noise levels at the Faith Presbyterian Church are also characterized by this measurement location.
- **Measurement Location R2:** on the northern boundary of the project site; representative of the project site entrance (on-site) and single-family residences along Addison Street.
- **Measurement Location R3:** on the western boundary of the project site; representative of the school's existing on-site play field and single-family residences along Morella Avenue.
- **Measurement Location R4:** along the southern boundary of the school; representative of the school's existing on-site play field and single-family residences along Huston Street.

The ambient noise measurements were conducted in accordance with City's standards on Wednesday, May 4 through Thursday, May 5, 2016, using a Larson-Davis 820 Precision Integrated Sound Level Meter (SLM).¹⁶⁵ The Larson-Davis 820 SLM is a Type 1 standard instrument as defined in the American National Standard Institute S1.4. Measurement instruments were calibrated and operated according to manufacturer specifications. The SLM microphone was placed five feet above the local grade.

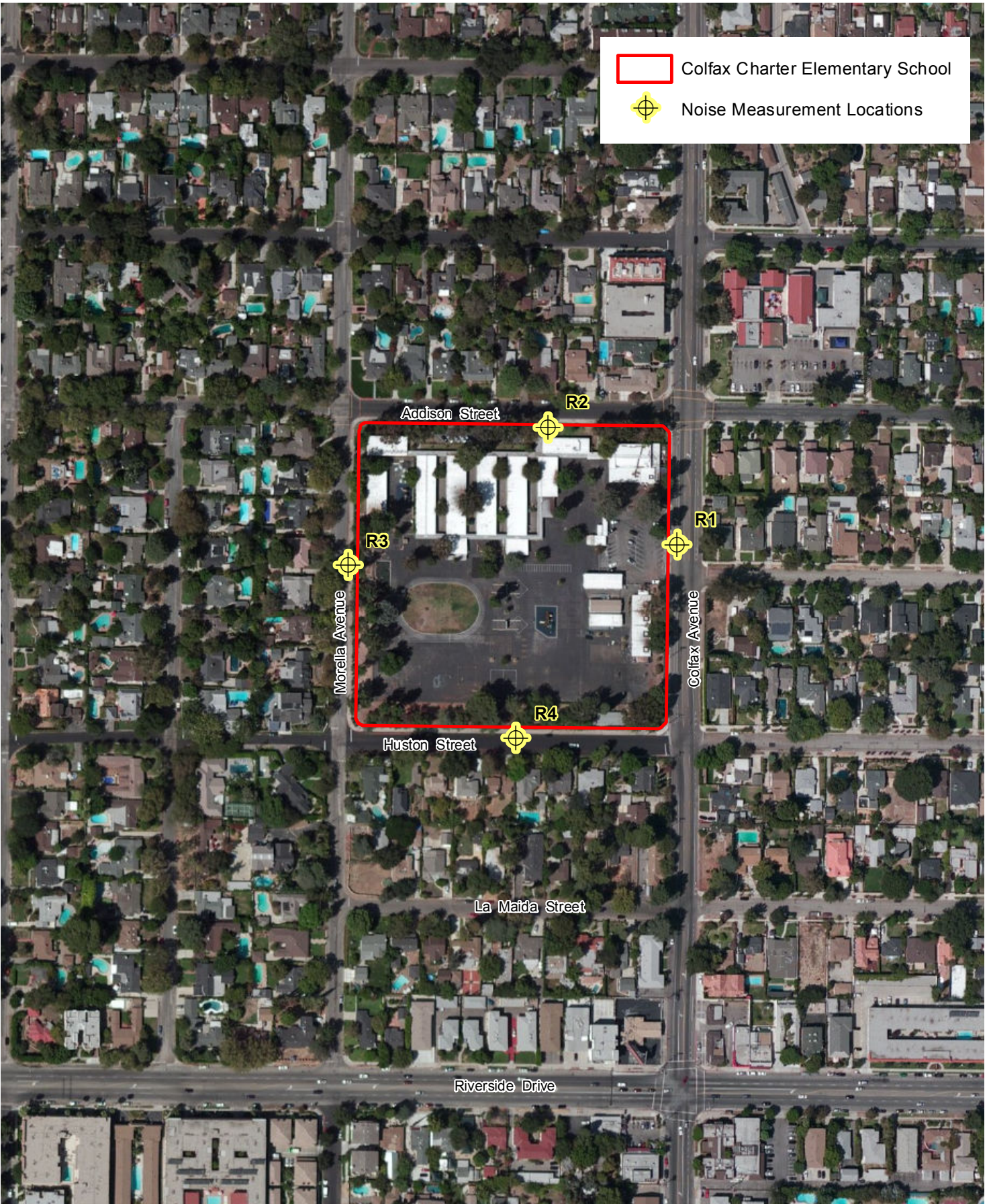
These locations provide a representative characterization of the existing noise conditions within the project vicinity. The results of the ambient noise measurement data are summarized in **Table B-6, Summary of Ambient Noise Measurements**. As shown in Table B-6, the measured daytime average noise levels on-site ranged from 62 – 66 dBA, L_{eq} ¹⁶⁶. The noise measurements at R3 and R4 were conducted during daytime only since Project-related construction activities which may generate noise would be limited by the City's noise ordinance, as discussed above. The measured daytime noise levels ranged from 58 dBA L_{eq} at R3 to 61 dBA, L_{eq} at R4. The monitoring demonstrated that the primary sources of noise in the immediate area of the project site were playground activities and traffic on Colfax Avenue, Addison Street, Morella Avenue, and Huston Street.

Project Construction Schedule

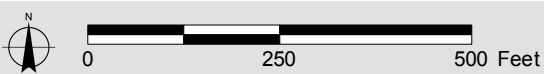
Construction of the proposed project would begin in late 2017, and continue for approximately 30 months, Project completion is anticipated by the middle of 2020. Approximately 40 to 50 construction workers would be onsite for the duration of the project. The typical construction work day would be eight hours per day, from approximately 7:00 a.m. to 3:00 p.m., on weekdays.

¹⁶⁵ Los Angeles Municipal Code, Section 111.01.

¹⁶⁶ L_{eq} is the equivalent steady-state A-weighted sound level that would contain the same acoustical energy as the time-varying A-weighted sound level during the same time interval.



Colfax Charter Elementary School
+ Noise Measurement Locations



Noise Measurement Locations

Colfax Charter Elementary School Classroom Addition Project
 Source: USDA FSA, 2014 (Aerial); ESA PCR, 2016.

FIGURE

B-1

On-Site Construction Activities

Noise from construction activities would be generated by vehicles and equipment involved during various stages of construction operations: demolition, site grading and excavation, foundation construction, and building construction.

The noise levels created by construction equipment would vary depending on factors such as the type of equipment, the specific model, the operation being performed and the condition of the equipment. Construction noise associated with the project was analyzed using a mix of typical construction equipment, the estimated durations, and construction phasing. The project construction noise model is based on construction equipment noise levels as published by the Federal Highway Administration.¹⁶⁷

Table B-6

Summary of Ambient Noise Measurements

Location, Duration, Existing Land Uses and, Date of Measurements	Measured Ambient Noise Levels, ^a (dBA)	
	Daytime (7 A.M. to 10 P.M.) Hourly L _{eq}	Nighttime (10 P.M. to 7 A.M.) Hourly L _{eq}
	R1- 5/4/16 (1:00 P.M.) Wednesday / 5/5/16 (1:00 P.M.) Thursday Average:	63 – 69 66
R2 – 5/4/16 (1:00 P.M.) Thursday / 5/5/16 (1:00 P.M.) Friday Average:	56 – 70 62	50 – 60 55
R3 5/4/16 8 A.M. to 9 A.M./ Wednesday	58	N/A
R4 5/4/16 8 A.M. to 9 A.M./ Wednesday	61	N/A

^a Detailed measured noise data, including hourly L_{eq} levels, are included in Appendix F

Source: PCR 2016.

In an outdoor environment, sound levels attenuate through the air as a function of distance. Such attenuation is called “distance loss” or “geometric spreading” and is based on the source configuration, point source or line source. For a point source such as construction equipment, the rate of sound attenuation is 6 dB per doubling of distance from the noise source. For example, a noise level of 85 dBA at a reference distance of 50 feet from the equipment would attenuate to 79 dBA at 100 feet, and 73 dBA at 200 feet.

¹⁶⁷ Roadway Construction Noise Model, Federal Highway Administration, 2006.

Table B-7, Estimate of Construction Noise Levels (L_{eq}) at Sensitive Receptor Locations, provides the estimated construction noise levels at nearby noise sensitive receptors. Detailed noise calculations for construction activities are provided in Appendix F of this MND. The calculated noise levels are representative of worst-case conditions when all noise generators are located closest to sensitive receptors. This is a conservative assumption as equipment would typically be used intermittently over the course of the day and be located throughout the site, further away from noise-sensitive receptors. These noise levels account for the project construction contractor equipping construction equipment, fixed or mobile, with properly operating and maintained noise mufflers, consistent with manufacturers' standards. As shown therein, construction-related noise would exceed the significance threshold of 75 dBA at the nearest single- and multi-family residential uses, R1 through R4. The highest construction noise level would be 90 dBA during the Kindergarten Buildings and Kitchen Upgrades at the noise sensitive receptor location R4 due to close proximity to the construction site.

Table B-7**Estimate of Construction Noise Levels (L_{eq}) at Sensitive Receptor Locations**

Receptor^a	Construction Phases	Minimum Distance, feet	Estimated Construction Noise Levels at Receptor,^a Hourly L_{eq} (dBA)	Significance Impacts Threshold, (dBA)	Exceeds Significance Threshold?
R1	Demolition and Removal of Portable Classrooms	100	80	75	Yes
	Utility Relocation	100	77	75	Yes
	Grading/Excavation	100	78	75	Yes
	Foundation	100	77	75	Yes
	Classrooms and Kindergarten Buildings	550	63	75	No
	Kitchen Upgrades and Administration Building Reuse & Landscaping	70	81	75	Yes
R2	Demolition and Removal of Portable Classrooms	340	59 ^b	75	No
	Utility Relocation	160	63 ^b	75	No
	Grading/Excavation	340	57 ^b	75	No
	Foundation	340	56 ^b	75	No
	Classrooms and Kindergarten Buildings	250	60 ^b	75	No
	Kitchen Upgrades and Administration Building Reuse & Landscaping	70	81	75	Yes
R3	Demolition and Removal of Portable	500	66	75	No

Table B-7 (Continued)

Estimate of Construction Noise Levels (L_{eq}) at Sensitive Receptor Locations

Receptor^a	Construction Phases	Minimum Distance, feet	Estimated Construction Noise Levels at Receptor,^a Hourly L_{eq} (dBA)	Significance Impacts Threshold, (dBA)	Exceeds Significance Threshold?
	Classrooms				
	Utility Relocation	210	71	75	No
	Grading/Excavation	500	64	75	No
	Foundation	500	63	75	No
	Classrooms and Kindergarten Buildings	80	80	75	Yes
	Kitchen Upgrades and Administration Building Reuse & Landscaping	80	80	75	Yes
R4	Demolition and Removal of Portable Classrooms	180	70 ^c	75	No
	Utility Relocation	300	68	75	No
	Grading/Excavation	180	68	75	No
	Foundation	180	67 ^c	75	No
	Classrooms and Kindergarten Buildings	400	66	75	No
	Kitchen Upgrades and Administration Building Reuse & Landscaping	100	78	75	Yes
Colfax Charter Elementary School	Demolition and Removal of Portable Classrooms	100	80	75	Yes
	Utility Relocation	50	83	75	Yes
	Grading/Excavation	100	78	75	Yes
	Foundation	100	77	75	Yes
	Classrooms and Kindergarten Buildings	25	90	75	Yes
	Kitchen Upgrades and Administration Building Reuse & Landscaping	25	90	75	Yes

Table B-7 (Continued)**Estimate of Construction Noise Levels (L_{eq}) at Sensitive Receptor Locations**

Receptor^a	Construction Phases	Minimum Distance, feet	Estimated Construction Noise Levels at Receptor,^a Hourly L_{eq} (dBA)	Significance Impacts Threshold, (dBA)	Exceeds Significance Threshold?
-----------------------------	----------------------------	-------------------------------	--	--	--

Note: Noise Sensitive Receptor locations R1 through R4 are shown on Figure B-1. Detailed calculations can be found in Appendix F.

- ^a *Estimated construction noise levels represent a conservative condition when noise generators are at the property boundary, located closest to the receptors.*
- ^b *Receptors are partially shielded from the construction site by existing buildings; and such shielding is included in the analyses representing a 10 dBA reduction in noise levels.*
- ^c *Receptors are partially shielded from the construction site by existing buildings; and such shielding is included in the analyses representing a 5 dBA reduction in noise levels.*

Source: PCR 2016.

Compliance with the applicable noise ordinances and incorporation of the LAUSD SC-N-5 would ensure that noise impacts associated with construction of the proposed project would be less than significant:¹⁶⁸

SC-N-5: LAUSD Facilities Division or its construction contractor shall consult and coordinate with the school principal or site administrator, and other nearby noise sensitive land uses prior to construction to schedule high noise or vibration producing activities to minimize disruption. Coordination between the school, nearby land uses and the construction contractor shall continue on an as-needed basis throughout the construction phase of the project to reduce school and other noise sensitive land use disruptions.

A summary of the construction noise impacts at the nearby sensitive receptors is provided in **Table B-8, Estimate of Construction Noise Levels (L_{eq}) at Sensitive Receptor Locations**. Construction noise levels at sensitive receptor locations were calculated with and without feasible methods of noise attenuation including the installation of sound blankets or other noise barriers. These calculations assumed a minimum performance standard of at least a 10 dBA reduction for sound blankets or other noise barriers facing receptors R1 and at least a 15 dBA reduction for sound blankets or other noise barriers facing Colfax Charter Elementary classrooms. During Kitchen Upgrades and Administration Building Reuse & Landscaping phases, installation of sound blankets or other noise barriers with a minimum performance standard of at least 10 dBA would be required for receptors R2 through R4.

¹⁶⁸ LAUSD School Upgrade Program Final Environmental Impact Report, September 2015, at page 5.12-17.

Table B-8

Estimate of Construction Noise Levels (Leq) at Sensitive Receptor Locations

Receptor ^a	Construction Phases	Minimum Distance, feet	Estimated Construction Noise Levels at Receptor, ^a Hourly Leq (dBA)	Estimated	Significance Impacts Threshold, (dBA)	Exceeds Significance Threshold?
				Construction Noise Levels at Receptor with Noise Barrier [N-12], Hourly Leq (dBA)		
R1	Demolition and Removal of Portable Classrooms	100	80	70 ^d	75	No
	Utility Relocation	100	77	67 ^d	75	No
	Grading/Excavation	100	78	68 ^d	75	No
	Foundation	100	77	67 ^d	75	No
	Classrooms and Kindergarten Buildings	550	63	63	75	No
	Kitchen Upgrades and Administration	70	81	71 ^d	75	No
	Building Reuse & Landscaping					
R2	Demolition and Removal of Portable Classrooms	340	59 ^b	59	75	No
	Utility Relocation	160	63 ^b	63	75	No
	Grading/Excavation	340	57 ^b	57	75	No
	Foundation	340	56 ^b	56	75	No
	Classrooms and Kindergarten Buildings	250	60 ^b	60	75	No
	Kitchen Upgrades and Administration	70	81	71 ^d	75	No
	Building Reuse & Landscaping					
R3	Demolition and Removal of Portable Classrooms	500	66	66	75	No
	Utility Relocation	210	71	71	75	No
	Grading/Excavation	500	64	64	75	No
	Foundation	500	63	63	75	No
	Classrooms and Kindergarten Buildings	80	80	70 ^d	75	No
	Kitchen Upgrades and Administration	80	80	70 ^d	75	No
	Building Reuse & Landscaping					
R4	Demolition and Removal of Portable	180	70 ^c	70	75	No

Table B-8 (Continued)

Estimate of Construction Noise Levels (L_{eq}) at Sensitive Receptor Locations

Receptor ^a	Construction Phases	Minimum Distance, feet	Estimated Construction Noise Levels at Receptor, ^a Hourly L_{eq} (dBA)	Estimated	Significance Impacts Threshold, (dBA)	Exceeds Significance Threshold?
				Construction Noise Levels at Receptor with Noise Barrier [N-12], Hourly L_{eq} (dBA)		
	Classrooms					
	Utility Relocation	300	68	68	75	No
	Grading/Excavation	180	68	68	75	No
	Foundation	180	67 ^c	67	75	No
	Classrooms and Kindergarten Buildings	400	66	66	75	No
	Kitchen Upgrades and Administration Building Reuse & Landscaping	100	78	68 ^d	75	No
Colfax Charter Elementary School	Demolition and Removal of Portable Classrooms	100	80	65 ^d	75	No
	Utility Relocation	50	83	68 ^d	75	No
	Grading/Excavation	100	78	63 ^d	75	No
	Foundation	100	77	62 ^b	75	No
	Classrooms and Kindergarten Buildings	25	90	75 ^d	75	No
	Kitchen Upgrades and Administration Building Reuse & Landscaping	25	90	75 ^d	75	No

Note: Noise Sensitive Receptor locations R1 through R4 are shown on Figure B-1. Detailed calculations can be found in Appendix F.

^a Estimated construction noise levels represent a conservative condition when noise generators are at the property boundary, located closest to the receptors.

^b Receptors are partially shielded from the construction site by existing buildings; and such shielding is included in the analyses representing a 10 dBA reduction in noise levels.

^c Receptors are partially shielded from the construction site by existing buildings; and such shielding is included in the analyses representing a 5 dBA reduction in noise levels.

^d Noise barriers assumed to be 12 ft. mounted noise barriers around construction areas, attenuating a minimum of 10 dBA on sides facing R1 through R4 and 15 dBA on sides facing on-site receptors.

Source: PCR 2016.

SC-N-5 will be implemented and accordingly the contractor will work with the school principal to minimize disruptions, this includes scheduling construction activity that generates the highest noise levels outside of designated testing periods occurring at Colfax Charter Elementary School. As a result, on-site construction-related noise impacts at nearby on- and off-site receptors would be less than significant with implementation of the Program EIR mitigation measures.

Off-Site Construction Activities

As a part of the project, a net cut of approximately 7,407 cubic yards of soil would be excavated and hauled from the project site. Haul routes for trucks would be directly on Colfax Avenue and Addison Street, as the new construction areas are immediately adjacent to these streets and the fire lane access/service road.

It is estimated that during excavation there would be a maximum of 18 haul truck trips per day. The project's haul trucks would generate approximately 45 dBA, Community Noise Equivalent Level (CNEL) at 25 feet along Colfax Avenue and 46 dBA, CNEL along Addison Street, which would not exceed the significance thresholds of 71 dBA, L_{eq} along Colfax Avenue (existing noise level of 66 dBA plus 5 dBA) and 61 dBA, L_{eq} along Addison Street (existing noise level of 56 dBA plus 5 dBA). The existing noise levels are shown in Table B-6. Therefore, noise impacts from off-site construction traffic would be less than significant, and no mitigation measures are required.

Operational Noise

The Program EIR outlines the following LAUSD noise level thresholds for school sites according to Education Code Section 17215 that are more stringent than the City thresholds. The project would result in a significant long-term noise impact if:¹⁶⁹

- Exterior noise levels exceed 67 dBA L_{eq}
- Interior classroom noise levels exceed 45 dBA L_{eq}
- Permanent noise level increase at nearby noise-sensitive land uses exceeds 3 dBA CNEL

However, the Education Code does not apply to school sites acquired prior to January 1, 1966, nor to any additions or extensions of those sites.¹⁷⁰ As stated in Response V.a of this MND, the Colfax Charter Elementary School campus opened in 1951, thus making it exempt to these thresholds.

Off-Site Traffic Noise

Vehicle trips attributed to operation of the project would increase traffic volumes along the major thoroughfares within the project vicinity. This increase in roadway traffic volumes was analyzed to determine if any significant traffic-related noise impacts would result from project development.

Table B-9, *Off-Site Traffic Noise Impacts*, shows the change in mobile source noise resulting from project implementation. As shown in the table, the off-site roadway traffic volumes associated with the project would result in a maximum increase in CNEL of 0.5 dBA along the segments of Addison Street, between Colfax Avenue and Laurel Canyon Boulevard. The largest cumulative (project plus ambient growth plus other

¹⁶⁹ *Ibid*, at page 5.12-25.

¹⁷⁰ *Ibid*, at page 5.12-34.

known related projects in the vicinity of the project site) roadway noise impact would be 0.6 dBA CNEL, which is also predicted to occur along Addison Street, between Colfax Avenue and Laurel Canyon Boulevard. Since noise level increases would not exceed 3 dBA CNEL, impacts would be less than significant and no mitigation measures are required.

Table B-9

Off-Site Traffic Noise Impacts

Roadway Segment	Calculated Traffic Noise Levels at 25 feet from Roadway, CNEL (dBA)				
	Existing	Future (2018) No Project ^a	Future (2018) with Project ^b	Project Increment ^c	Cumulative Increment ^d
Colfax Avenue					
North of Magnolia Boulevard	65.6	65.8	65.8	0.0	0.2
Between Magnolia Boulevard and Addison Street	66.2	66.4	66.5	0.1	0.3
Between Addison Street and Riverside Drive	66.6	66.8	66.9	0.1	0.3
South of Riverside Drive	67.1	67.4	67.4	0.0	0.3
Addison Street					
East of Colfax Avenue	54.2	54.5	54.6	0.1	0.4
Between Colfax Avenue and Laurel Canyon Boulevard	56.0	56.1	56.6	0.5	0.6
West of Laurel Canyon Boulevard	54.5	54.6	54.9	0.3	0.4
Riverside Drive					
East of Colfax Avenue	68.7	69.0	69.0	0.0	0.3
Between Colfax Avenue and Laurel Canyon Boulevard	69.3	69.5	69.5	0.0	0.2
West of Laurel Canyon Boulevard	69.7	70.0	70.0	0.0	0.3
Magnolia Boulevard					
East of Colfax Avenue	67.6	67.9	67.9	0.0	0.3
Between Colfax Avenue and Laurel Canyon Boulevard	67.3	67.6	67.6	0.0	0.3
West of Laurel Canyon Boulevard	67.3	67.5	67.5	0.0	0.2
Laurel Canyon Boulevard					
North of Magnolia Boulevard	69.8	70.2	70.2	0.0	0.4
Between Magnolia Boulevard and Addison Street	70.1	70.5	70.5	0.0	0.4
Between Addison Street and Riverside Drive	70.0	70.4	70.4	0.0	0.4
South of Riverside Drive	70.8	71.2	71.2	0.0	0.4

-
- ^a Includes future growth plus related (cumulative) projects identified in the Traffic Study.
- ^b Includes future growth plus related (cumulative) projects and Project traffic.
- ^c Increase due to Project-related traffic only at Project build-out.
- ^d Increase due to future growth, related (cumulative) projects, and Project traffic.

Source: PCR 2016.

On-Site Operational Noise

On-site noise generated by the proposed project would result primarily from school-related and mechanical noise. School-related noise is typically exempt under jurisdictional municipal codes, and would not represent a significant noise impact. Additionally, LAUSD SCN-5, discussed previously, would ensure that noise impacts associated with operations of the proposed project would be less than significant.¹⁷¹

The operation of mechanical equipment such as air conditioning equipment and exhaust fans may generate audible noise levels. Mechanical equipment would likely be located on building rooftops or within buildings, shielded from nearby uses to attenuate noise and avoid conflicts with adjacent uses. In addition, the project's mechanical equipment would need to comply with the City's Noise Ordinance, which establishes maximum permitted noise levels from mechanical equipment. Project compliance with the City Noise Ordinance and LAUSD SC-N-5 would ensure that noise levels from building mechanical equipment would be less than significant. Compliance with the applicable noise ordinances and incorporation of LAUSD SC-N-5 would ensure that project construction and operational noise impacts would be less than significant. No mitigation measures or further evaluation are required.

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

Less Than Significant Impact. School operations do not involve sources that cause substantial groundborne noise or vibration.¹⁷² Construction activities associated with SUP-related projects, including the proposed project, could cause short-term vibration impacts from the use of heavy construction equipment.¹⁷³ The project would be constructed using typical construction techniques. As such, it is anticipated that the equipment to be used during construction would not cause excessive groundborne noise or vibration.

The City does not address vibration either in the LAMC or in the Noise Element of the General Plan. The effect on buildings in the vicinity of a construction site varies depending on the soil type and construction type, with vibration results ranging from no perceptible effects, to low rumbling sounds, and even to slight structural damage at the highest levels.¹⁷⁴ According to the Federal Transit Administration, ground

¹⁷¹ *Ibid*, at page 5.12-17.

¹⁷² *Ibid*, at pages 5.12-27 to 5.12-29.

¹⁷³ *Ibid*.

¹⁷⁴ *Ibid*.

vibrations from construction activities very rarely reach the level that can damage structures.¹⁷⁵ A possible exception is the case of old, fragile buildings of historical significance where special care must be taken to avoid damage.

This project would utilize construction equipment such as use of tractors, loaders, dozers, and excavators, which would generate groundborne vibration during grading and excavation activities. Based on the vibration data by the Federal Transit Administration, typical vibration velocities from the operation of large dozers would be approximately 0.089 inch per second (peak particle velocity; PPV) perception threshold at 25 feet from the source of activity.

The closest occupied school structures and the nearest residential buildings, to the construction areas are approximately 100 feet from the project excavation site and would be exposed to vibration velocities up to 0.011 inch per second PPV. As these values would not exceed the 0.2 inch per second PPV significance threshold (for architectural damage for a timber structure), vibration impacts associated with construction would be less than significant at the nearest educational and residential building.¹⁷⁶

With respect to human perception, as discussed above, the nearest on-site occupied school structures and the nearest off-site residential structure would be exposed to vibration velocities up to 0.011 inch per second PPV. The Program EIR identifies 0.1 inch per second PPV as the threshold for annoyance to nearby residential units or classrooms.¹⁷⁷ As these values would not exceed this threshold, vibration impacts during excavation phase would be less than significant.¹⁷⁸ As such, project construction and operation would not result in the generation of excessive groundborne vibration, and impacts would be less than significant. No mitigation measures or further evaluation are required.

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

Less Than Significant Impact. The existing noise environment in the project area is dominated by traffic noise from nearby roadways, Colfax Charter Elementary School, as well as nearby residential activities. Long-term operation of the project would not have a significant effect on the community noise environment in proximity to the project site, as noise levels would be similar to the current conditions of an operating school. Noise sources that would have potential noise impacts include off-site vehicle traffic and mechanical (e.g., air-conditioning) equipment. As discussed in Response to Checklist Question XI.a, the proposed project would not increase off-site auto traffic volume, which would normally result in an increased ambient noise level. Noise levels associated with on-site operations (e.g., school noise, parking and mechanical equipment) are also considered less than significant. As such, there would not be a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project, and impacts would be less than significant. No mitigation measures or further evaluation are required.

¹⁷⁵ U.S. Department of Transportation, Federal Transit Administration, *Transit Noise and Vibration Impact Assessment*, 2006.

¹⁷⁶ *Ibid.*

¹⁷⁷ LAUSD School Upgrade Program Final Environmental Impact Report, September 2015, at pages 5.12-28.

¹⁷⁸ California Department of Transportation (Caltrans), *Transportation- and Construction-Induced Vibration Guidance Manual*, June 2004.

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. The project would result in a temporary increase in ambient noise near the project site from the use of stationary and mobile construction equipment during the construction period. Construction noise impacts are discussed in Response to Checklist Question XI.a. Project-related construction noise would be localized and would occur intermittently for varying periods of time.¹⁷⁹ Noise generated by on-site construction activities would have a less than significant impact on surrounding uses with incorporation of the prescribed SCs, related to exceeding noise standards. Compliance with the applicable noise ordinances and incorporation of LAUSD SC-N-5 would ensure that there would not be a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project, and impacts would be less than significant. No mitigation measures or further evaluation are required.

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

No Impact. The project site is not located within an airport land use plan area or within two miles of a public airport or public use airport. The closest airport is Bob Hope Airport, located approximately four miles from the project site. Therefore, construction or operation of the project would not expose people to excessive airport related noise levels. No mitigation measures or further evaluation are 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. The project site is not located within the vicinity of a private airstrip, or heliport or helistop. SUP projects would not create any new safety hazards associated with heliport operations, and no impact would occur in this regard. Therefore, the proposed project would not expose people residing or working in the project area to excessive noise levels from such uses. No mitigation measures or further evaluation are required.

¹⁷⁹ LAUSD School Upgrade Program Final Environmental Impact Report, September 2015, at page 5.12-32.

XIII. PEDESTRIAN SAFETY

Parts of the following evaluation of pedestrian safety are based, in part, on the technical report for the project entitled “Traffic Study for the Colfax Elementary School Classroom Addition Project” (“Traffic Study”) prepared for PCR Services Corporation by RAJU Associates, Inc. on October 2016. The Traffic Study, which is included as Appendix G of this MND, evaluated project site and vicinity transportation and traffic impacts for the proposed project.

Would the project:

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

Less Than Significant Impact With Mitigation Incorporated. There will be an increase in enrollment, but the proposed project will accommodate existing and expected students that reside within the enrollment boundaries of the school. The design of the project would include the use of 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.¹⁸⁰ Because the project will be developing more than 10 classrooms, the project will be subject to the School Traffic Safety Reference Guide REF-4492.1, which includes guidance on passenger loading zones and the procedures for parking and pedestrian safety, as required by SC-PED-4.¹⁸¹ Implementation of LAUSD OEHS CEQA Specification Manual, Appendix C, Traffic and Pedestrian Safety Requirements for New Schools and the School Design Guide, include ensuring that bus and car loading areas do not overlap, thereby reducing the potential for conflicts between cars and buses arriving and departing, especially during pick-up and drop-off times (SC-PED-5).¹⁸² In addition, projects are required to 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.¹⁸³

SC-PED-4: School Traffic Safety Reference Guide REF-4492.1. This Reference Guide replaces Reference Guide 4492.0, School Traffic Safety, September 30, 2008. Updated information is provided, including new guidance on passenger loading zones and the Safety Valet Program. The Guide sets forth requirements for traffic and pedestrian safety, and procedures for school principals to request assistance from OEHS, the Los Angeles School Police Department (LASPD), or the local police department regarding traffic and pedestrian safety. Distribution and posting of the Back to School Safety Tips flyer is required. This guide also includes procedures for traffic surveys, parking restrictions, crosswalks, advance warning signs (school zone), school parking signage, traffic controls, crossing guards, or for determinations on whether vehicle enforcement is required to ensure the safety of students and staff.

¹⁸⁰ LAUSD School Upgrade Program Final Environmental Impact Report, September 2015, at pages 5.13-10 to 5.13-11.

¹⁸¹ *Ibid*, at page 5.13-6.

¹⁸² *Ibid*.

¹⁸³ *Ibid*, at pages 5.13-10 to 5.13-11.

SC-PED-5: School Design Guide. The Guide states student drop-off and pick-up, bus loading areas, and parking areas shall be separated to allow students to enter and exit the school grounds safely.

As described in Attachment A, *Project Description*, the project would improve vehicular and pedestrian access to the site by reconfiguring internal parking and circulation. The main entrance for the school is currently located along Addison Street, with the Kindergarten entry located along Morella Avenue. The new main school entry will be along Colfax Street by the new Classroom and Administration Building, to the north of the new parking lot. As stated in the Vehicular and Pedestrian Circulation System Evaluation Technical Memorandum, Appendix B of the Traffic Study, a separate eight-foot student drop-off/pick-up lane with a 16-foot drive aisle and 10-foot on-site sidewalks would be provided. The sidewalks along Addison Street, Colfax Avenue, and Morella Avenue are marked as “Passenger Loading Only,” with signage prohibiting parking during specified student pick-up/drop-off hours. The existing school staff parking lot on Addison Street contains a drop-off/pick-up area on the south side of Addison Street between the school entrance and Colfax Avenue. Another drop-off/pick-up area occurs on the east side of Morella Avenue adjacent to the school’s kindergarten entrance. As part of the proposed project, a 28-foot-wide driveway on the north side of Huston Street will be provided approximately 120 feet west of Colfax Avenue.

The school’s pedestrian gates are located within the parking lot on Colfax Avenue, at the school entrance on the south side of Addison Street, on the east side of Morella Avenue, and on Huston Street. Pedestrian access and circulation is provided on the west side of Colfax Avenue, south side of Addison Street, east side of Morella Avenue, and north side of Huston Street. Colfax Avenue and Addison Street’s intersection is controlled by a traffic signal with school crosswalk pavement markings on all four legs. Morella Avenue and Addison Street’s intersection is stop-controlled with school crosswalk pavement markings on three legs. Morella Avenue and Huston Street’s intersection is stop-controlled with no crosswalk pavement markings. Huston Street and Colfax Avenue’s intersection is controlled by two-way stop signs along Huston Street, with Colfax Avenue traffic uncontrolled at the intersection. There are no crosswalks at this intersection.

Ingress for student drop-off to the new parking lot would only be from Colfax Avenue, and egress will only be permitted from Huston Street. Staff ingress would be allowed through a controlled entrance on Huston Street. As shown in **Figure A-11, *New Parking Lot Plan***, the 38 new parking spaces will be provided for faculty, staff and visitors. An internal student drop-off and pick up lane will be established within this new parking lot, allowing for a much safer drop-off than on the street. Students will be dropped off via a dedicated lane, while cars continuing through the lot will continue use a second lane to exit on Huston Street. Up to 45 bicycle parking spaces will be located within the new parking lot. Currently, there is no student bus drop-off occurring at Colfax; however, should the need arise for a small bus (e.g., for disabled students) to access the site, the drop-off location would be along Addison Street.

During project construction, students in First through Fifth Grades would access the school from the existing Addison Street entrance. After project completion, the new primary school access would be on Colfax Avenue, while staff would be able to access the campus from the parking lots on Addison Street and Colfax Avenue. Kindergarten students would continue to access the campus from the existing Morella Avenue entrance. Compliance with SC-PED-5, LAUSD OEHS CEQA Specification Manual, and LAFD requirements would ensure that project impacts would not be significant. The project as designed would improve pedestrian safety, and impacts with respect to vehicular and/or pedestrian safety hazards would be less than significant. No mitigation measures or further evaluation are required.

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

No Impact. The proposed project would occur on an existing school campus, and the project would be implemented in accordance with LAUSD Standards, as described above in Response to Checklist Question XIII.a. According to the *Traffic Study for the Colfax Elementary School Classroom Addition Project*, provided in Appendix G, prepared by RAJU Associates, Inc. in October 2016, project operation would generate a net total of 206 daily trips of which 94 trips would occur during the morning peak hour. The City of Los Angeles Department of Transportation has provided the District with a “Safe Routes to School” map for the students of Colfax Charter Elementary School, which details travel routes to the school and identifies the best intersections for students to cross to access the school.¹⁸⁴ These same routes would be utilized by students to access the existing school site and would not be altered as a result of the proposed project. As such, the project would not create an unsafe route to school, and there would be no impacts to students walking from local neighborhoods. No mitigation measures or further evaluation are required.

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

No Impact. The proposed project would occur on an existing school campus, and the project would be implemented in accordance with LAUSD Standards, as described above in Response to Checklist Question XIII.a. Students already walk and bike to the existing school, and safety devices, such as crosswalks, traffic lights, and signage, are already in place. As such, implementation of the proposed project would not pose a new safety hazard, as compared to current conditions.¹⁸⁵ All SUP projects would implement LAUSD Standards and compliance measures as necessary. There would no impact in this regard. No mitigation measures or further evaluation are required.

XIV. POPULATION AND HOUSING

Would the project:

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

No Impact. Implementation of the project, including the removal and construction of new classrooms, would increase student enrollment at Colfax Charter Elementary School by up to 160 new students as well as eight additional staff members, but the project would accommodate existing and expected students that reside within the enrollment boundaries of the school.¹⁸⁶ The proposed project would generate short-term construction employment; however, the regional labor force would be utilized. There would be a negligible increase of eight employees at the project site after buildout. The project does not include the extension of

¹⁸⁴ *City of Los Angeles Department of Transportation, Pedestrian Routes for Colfax Charter Elementary School, August 2012. Available at: http://ladot.lacity.org/sites/g/files/wph266/f/lacityp_021949.pdf. Accessed on May 31, 2016.*

¹⁸⁵ *LAUSD School Upgrade Program Final Environmental Impact Report, September 2015, at pages 5.13-11 to 5.13-12.*

¹⁸⁶ *Ibid, at page 5.14-9.*

roads or increased capacity of any existing off-site infrastructure. Major infrastructure facilities are in place to serve the surrounding developed area. Minor infrastructure improvements would occur on site to serve the proposed addition. Therefore, the project would not induce substantial population growth in the area, either directly or indirectly. No mitigation measures or further evaluation are required.

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

No Impact. The project would be implemented on an existing school campus, and there is no existing housing at Colfax Charter Elementary School that could be displaced due to project construction or operation. Therefore, there would be no impact in this regard. No mitigation measures or further evaluation are required.

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

No Impact. The project would be implemented on an existing school campus, and there are no people that would be displaced due to project construction or operation. Therefore, there would be no impact in this regard. No mitigation measures or further evaluation are required.

XV. PUBLIC SERVICES

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

a) Fire protection?

Less Than Significant Impact. LAFD provides fire protection and emergency medical services in the City of Los Angeles. The closest LAFD fire station is Fire Station 60, located at 5320 Tujunga Avenue, which is located approximately one mile northeast of the project site.¹⁸⁷ Fire Station 78, located at 4041 Whitsett Avenue, is approximately two miles southwest of the project site, also serves the project site.¹⁸⁸

Construction of the project may result in a temporary increase in demand for fire protection and emergency medical services. There will be an increase in enrollment, but the proposed project will accommodate existing and expected students that reside within the enrollment boundaries of the school. As overall District enrollment is forecast to decrease over the next ten years, implementation of the SUP and the proposed project would not generate increased demands for fire protection and emergency services due to a

¹⁸⁷ *City of Los Angeles Department of City Planning, Zoning Information and Mapping System (ZIMAS). Website: zimas.lacity.org. Accessed May 2016.*

¹⁸⁸ *Los Angeles Fire Department, Fire Stations, Find Your Station. Website: <http://www.lafd.org/fire-stations/station-results?st=666&address=11724%20addison%20street>. Accessed May 2016.*

significant increase in people on District campuses.¹⁸⁹ Response times would not be affected by the 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 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. No mitigation measures or further evaluation are required.

b) Police protection?

Less Than Significant Impact. As stated in the Program EIR, the LASPD is the primary provider of police protection to District schools, providing security to schools within its jurisdiction. LASPD is the largest independent school police department in the United States, with over 350 sworn police officers, 126 nonsworn school safety officers, and 34 civilian support staff dedicated to serving LAUSD.¹⁹⁰ An LASPD officer may provide on-campus security and officers would be made available to serve the proposed school, as necessary. General campus activities would be under the supervision of the principal, vice principal, teachers, and other campus employees. As specified in *Attachment A, Project Description*, most of the campus perimeter is currently surrounded by eight-foot-high chain-link security fencing. A majority of the chain link fence along the new school entrance at Colfax Avenue and the Kindergarten entrance along Morella Avenue will be replaced with new decorative perimeter fencing. The ornamental screen fence will consist of perforated ornamental metal, with graphic images of children and trees on them. For security purposes, the new main entrance gate will include upgraded security fencing. There will be electronic security and access control at school entrances and parking lots.

The LAPD would be the secondary providers of law enforcement services within the project area and would supplement LASPD. The Valley Bureau's North Hollywood Community Police Station, is located at 11640 Burbank Boulevard, in North Hollywood, approximately one mile north from the project site.¹⁹¹ LASPD maintains a cooperative working relationship with the LAPD.

Demands for police protection are generated more by an increase in the population within a service area than by the number of buildings or total building area. There will be an increase in enrollment, but the proposed project will accommodate existing and expected students that reside within the enrollment boundaries of the school. Implementation of the project would not increase enrollment at the District level, and overall District enrollment is forecast to decrease. Implementation of the proposed project would not generate an 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. In addition, the project would comply with LAUSD Standards regarding

¹⁸⁹ LAUSD School Upgrade Program Final Environmental Impact Report, September 2015, at pages 5.15-5 and 5.15-6.

¹⁹⁰ *Ibid*, at pages 5.15-10.

¹⁹¹ Los Angeles Police Department, *Our Communities, Valley Bureau, North Hollywood Community Police Station*. Website: http://www.lapdonline.org/north_hollywood_community_police_station. Accessed May 2016.

emergency response procedures and school safety, as required.¹⁹² As such, impacts with respect to response times would be less than significant, and no new or expanded police protection services or facilities would be required. No mitigation measures or further evaluation are required.

c) Schools?

No Impact. Implementation of the proposed project would be limited to improvements at an existing school campus. Implementation of the proposed project would not increase the population in the area or generate new students at Colfax Charter Elementary School. There will be an increase in enrollment, but the proposed project will accommodate existing and expected students that reside within the enrollment boundaries of the school. There would be no impact with respect to school services, as a result of the proposed project.¹⁹³ No mitigation measures or further evaluation are required.

d) Parks?

Less Than Significant Impact. The City of Los Angeles has 420 parks totaling approximately 15,700 acres.¹⁹⁴ Implementation of the proposed project would be limited to improvements at an existing school campus. The demand for parks is generated by the population in the parks' service areas. As the proposed project would only accommodate existing and expected students that reside within the enrollment boundaries of the school and not induce further growth, there will be no significant demand for parks. No mitigation measures or further evaluation are required.

e) Other public facilities?

Less Than Significant Impact. The Los Angeles Public Library provides library services to the City of Los Angeles. The North Hollywood Amelia Earhart Regional Library, a branch of the Los Angeles Public Library System, is located at 5211 Tujunga Avenue, in North Hollywood, approximately one mile northeast of Colfax Charter Elementary School.¹⁹⁵ Demand for library services and facilities are generated by an increase in population in the libraries' service areas. Implementation of the proposed project would not generate new students in the library service area.¹⁹⁶ Furthermore, Colfax Charter Elementary School has a library on campus which serves its student population. As such, the proposed project would not generate an increased demand on public library services in the area, as it would accommodate current student enrollment. Impacts would be less than significant, and no new or physically altered library facilities would be required as a result of project implementation. No mitigation measures or further evaluation are required.

The proposed project would not affect any other public facilities. There will be an increase in enrollment, but the proposed project will accommodate existing and expected students that reside within the enrollment

¹⁹² LAUSD School Upgrade Program Final Environmental Impact Report, September 2015, at pages 5.15-11.

¹⁹³ *Ibid*, at page 5.15-12.

¹⁹⁴ *Ibid*, at page 5.16-5.

¹⁹⁵ Los Angeles Public Libraries, Location and Hours, North Hollywood Amelia Earhart Regional Library. Website: http://www.lapl.org/branches?distance%5Bpostal_code%5D=91601&distance%5Bsearch_distance%5D=3&distance%5Bsearch_units%5D=mile&field_branch_resources_services_tid=All. Accessed May 2016.

¹⁹⁶ LAUSD School Upgrade Program Final Environmental Impact Report, September 2015, at page 5.15-15.

boundaries of the school. The project would not generate an increased demand on any public or governmental facilities. No new or physically altered government or public facilities would be required as a result of project implementation, and there would be no impacts in this regard. No mitigation measures or further evaluation are required.

XVI. RECREATION

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

No Impact. The City of Los Angeles Department of Recreation and Parks operates the North Hollywood Recreation Center, located at 11430 Chandler Boulevard, in North Hollywood, approximately one mile northeast of Colfax Charter Elementary School. North Hollywood Recreation Center has an indoor gymnasium, community room, auditorium, lighted baseball diamond courts, lighted basketball courts, children play areas, handball courts, indoor gyms, picnic tables, seasonal pool, and lighted tennis courts.¹⁹⁷ Demands for park facilities are generated by an increase in the population in the park's service area. In addition, Colfax Charter Elementary School has its own athletic playfields and recreational facilities for use by its students which would decrease the project's impact on existing neighborhood and regional parks or recreational facilities. The proposed project would not increase the population in the area, as it consists of the replacement of buildings and other on-campus improvements at an existing school. Therefore, there would be no impact in this regard.¹⁹⁸ No mitigation measures or further evaluation are required.

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

No Impact. The proposed project would not develop recreational facilities outside of District-owned properties, and Colfax Charter Elementary School has its own athletic and recreational facilities which would reduce the project's impact on existing recreational facilities, as discussed above in Response to Checklist Question XVI.a.¹⁹⁹ As such, impacts associated with the proposed project are taken into consideration in the analysis of all project impacts. Accordingly, the provision of these facilities would not have an impact outside the scope of the project. The project would not result in any unique impacts to recreational resources or require expansion of existing facilities. No mitigation measures or further evaluation are required.

¹⁹⁷ *City of Los Angeles Department of Recreation and Parks, North Hollywood Recreation Center. Website: <http://www.laparks.org/dos/reccenter/facility/northHollywoodRC.htm>. Accessed May 2016.*

¹⁹⁸ *LAUSD School Upgrade Program Final Environmental Impact Report, September 2015, at page 5.16-6 to 5-16-7.*

¹⁹⁹ *Ibid.*

XVII. TRANSPORTATION/TRAFFIC

The following evaluation of transportation and traffic is based, in part, on the technical report for the project entitled “Traffic Study for the Colfax Elementary School Classroom Addition Project” (“Traffic Study”) prepared for PCR Services Corporation by RAJU Associates, Inc. in October 2016. The Traffic Study, which is included as Appendix G of this MND, evaluated project site and vicinity transportation and traffic impacts for the proposed project.

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 With Mitigation Incorporated. Colfax Charter Elementary School takes up an entire block, bordered on the north by Addison Street, on the east by Colfax Avenue, on the south by Huston Street, and on the west by Morella Avenue. Project implementation will not occur across the entire school campus, but on selected areas of the campus undergoing renovation. Regional transportation facilities serving the project vicinity include the Hollywood Freeway (SR 170), located approximately 0.4 mile east of the project site, and the Ventura Freeway (I-101), located approximately 0.3 mile south of the project site. Local access to the Hollywood Freeway is provided by Magnolia Boulevard and Tujunga Avenue, and the Ventura Freeway is accessed by Tujunga Avenue and Laurel Canyon Boulevard. Direct access to the site is provided by Addison Street, Colfax Avenue, Morella Avenue, and Huston Street. Haul routes for trucks would be directly from Colfax Avenue and Addison Street, as the new construction areas are immediately adjacent to these streets and the fire lane access/service road, then on to the I-210 Freeway.

The Traffic Impact Study evaluated the following six study intersections (all signalized), based on consultation with Los Angeles Department of Transportation (LADOT):

1. Laurel Canyon Boulevard and Magnolia Boulevard
2. Laurel Canyon Boulevard and Addison Street
3. Laurel Canyon Boulevard and Riverside Drive
4. Colfax Avenue and Magnolia Boulevard
5. Colfax Avenue and Addison Street
6. Colfax Avenue and Riverside Drive

The six intersections are shown in **Figure B-2, Location of Project and Analyzed Intersections**, below. The following traffic scenarios have been analyzed at each of the six intersections: Existing (Year 2016) Base Conditions, Existing (Year 2016) plus Project Conditions, Future (Year 2018) Base Conditions, and Future

(Year 2018) plus Project Conditions. The analyses of future (Year 2018) conditions included cumulative traffic attributable to ambient growth and related projects within the Project study area. Traffic volumes for existing conditions were obtained from manual traffic counts collected in May 2016 when the local schools were in session. The Future (Year 2018) Base Conditions were estimated for background growth in area-wide trip making and trips generated by future developments in the Project vicinity. There are 24 related projects identified within the study area as provided by the City of Los Angeles Department of Transportation, and they are expected to generate 1,924 trips during the morning peak hour. The Future (Year 2018) plus Project Conditions includes the Project traffic and cumulative base traffic volumes.

Total Project trip generation, accounting for the existing uses and trips that are generated on the Project Site, are shown in **Table B-10, Estimated Project Trip Generation**. As shown in the table, once completed and occupied, the Project is anticipated to generate a total of 206 net trips per day, with 94 trips during the AM peak hour.

Table B-10

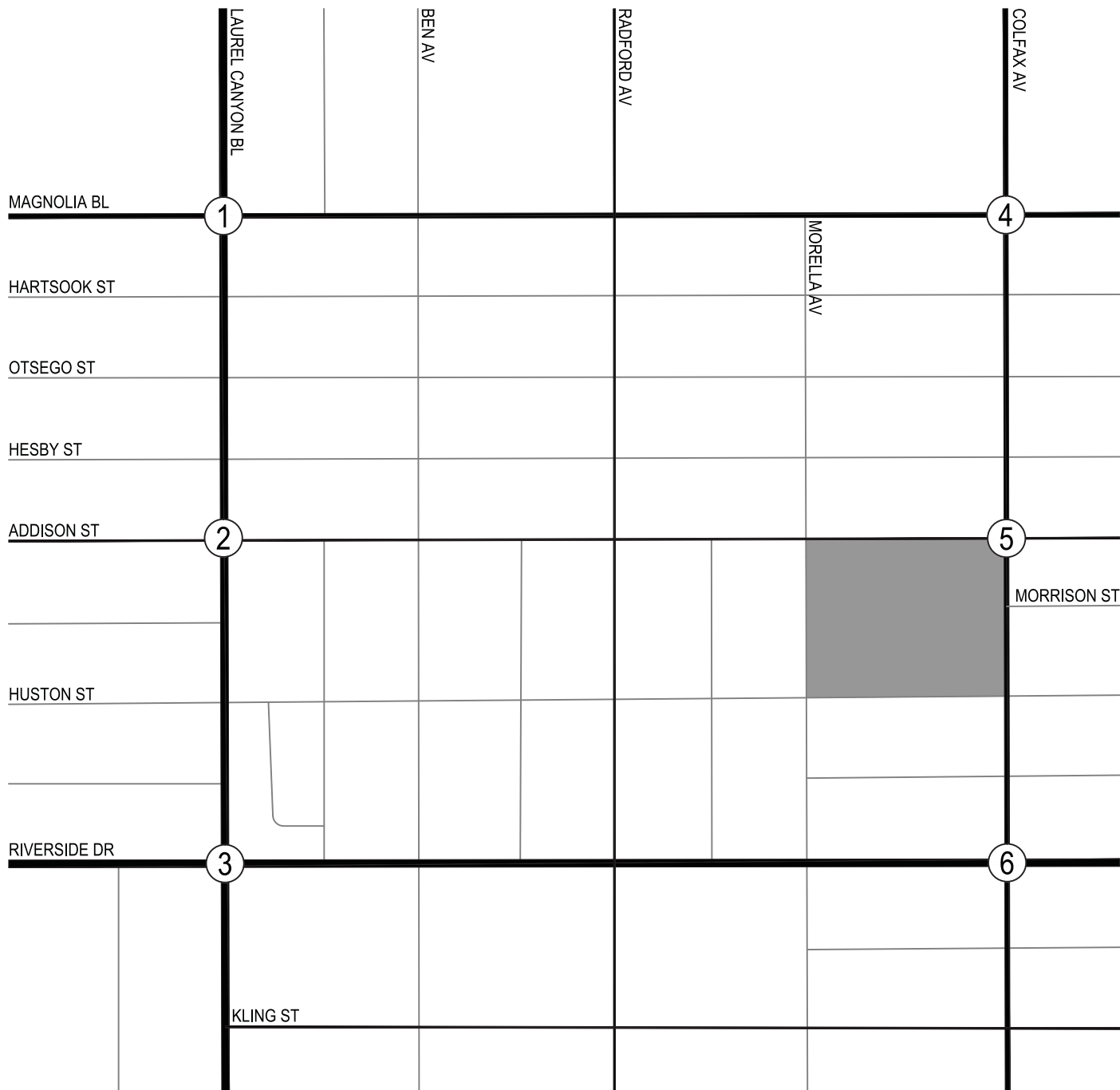
Estimated Project Trip Generation

	Size	Daily	AM Peak Hour		Total
			In	Out	
Proposed Project Elementary School	160 students	206	49	45	94
Trip Rates ^a Elementary School	Trips per student	1.29	53%	47%	0.59

^a Daily trip rates used are from *Trip Generation Manual, 9th Edition, ITE 2012*. AM peak hour trip rates for the Valley Region were used from the *Memorandum of Cooperation between LAUSD and LADOT, June 2005*.

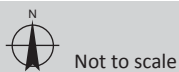
Source: RAJU Associates, Inc., 2016

The primary factors affecting the trip distribution patterns are the nature of the Project uses, existing traffic patterns, characteristics of the surrounding roadway system, geographic location of the Project site and its proximity to freeways and major travel routes, employment and residential centers from which club members would likely be attracted, residential areas from which employees would likely be drawn, and the various regions generating visitors and patrons. Based on the above mentioned factors, the overall Project trip distribution percentages were determined and are shown in **Table B-11, Project Directional Trip Distribution Percentages**.



LEGEND:

- Analyzed Intersection
- Project Site



Location of Project and Analyzed Intersections

Colfax Charter Elementary School Classroom Addition Project
 Source: Raju Associates, Inc., 2016.

FIGURE
B-2

Table B-11**Project Directional Trip Distribution Percentages**

Direction	Percentage
To and From the North	20%
To and From the South	30%
To and From the East	20%
To and From the West	30%
Total	100%

Source: RAJU Associates, Inc., 2016

Under the Existing (Year 2016) plus Project Conditions Scenario, all six of the study intersections are projected to continue to operate at LOS D or better during the morning peak hour. Under the Cumulative (2018) Base Conditions Scenario, five of the six intersections are projected to operate at LOS D or better during the morning peak hour, but the Laurel Canyon Boulevard and Riverside Drive intersection is projected to operate at LOS E during the morning peak hour. There is no change from the Future (Year 2018) Base Conditions Scenario in the Under the Future (Year 2018) plus Project Conditions Scenario, and the same intersection is still projected to operate at LOS E during the morning peak hour. The proposed project would not cause significant impacts at the analyzed intersections under both the existing and cumulative future conditions. There will be no project-specific mitigation measures. **Table B-12, *Impact Summary for Existing (Year 2016) and Future (Year 2018) Traffic Conditions***, provides a summary of the scenarios.

As discussed in previous sections, there will be an increase in enrollment, but the proposed project will accommodate existing and expected students that reside within the enrollment boundaries of the school. The project proposes to remove 10 portable classrooms and construct 18 new classrooms and two administration spaces, creating a net of eight new classrooms, which would generate additional vehicular trips.²⁰⁰ With implementation of LAUSD SC-T-2, site-specific traffic impacts would include measures to reduce significant traffic impacts.²⁰¹ The addition of 38 new parking spaces will further ease traffic in the surrounding neighborhood. Operational impacts would be less than significant.

²⁰⁰ *Ibid*, at pages 5.17-10 to 5.17-11.

²⁰¹ *Ibid*, at page 5.17-5.

Table B-12

Impact Summary for Existing (Year 2016) and Future (Year 2018) Traffic Conditions

Intersection	Peak Hour	Existing (Year 2016) conditions					Future (Year 2018) Conditions					Significant Impact? ^a
		Existing		Plus Project			Existing		Plus Project			
		V/C	LOS	V/C	LOS	Impact	V/C	LOS	V/C	LOS	V/C	
1. Laurel Canyon Blvd. & Magnolia Blvd.	AM	0.795	C	0.795	C	0.000	0.871	D	0.871	B	0.000	NO
2. Laurel Canyon Blvd. & Addison St.	AM	0.516	A	0.518	A	0.002	0.571	A	0.573	A	0.002	NO
3. Laurel Canyon Blvd. & Riverside Dr.	AM	0.896	D	0.897	D	0.001	0.971	E	0.971	A	0.000	NO
4. Colfax Ave. & Magnolia Blvd.	AM	0.715	C	0.719	C	0.004	0.781	C	0.784	B	0.003	NO
5. Colfax Ave. & Addison St.	AM	0.545	A	0.565	A	0.020	0.580	A	0.600	E	0.020	NO
6. Colfax Ave. & Riverside Dr.	AM	0.803	D	0.808	D	0.005	0.851	D	0.856	C	0.005	NO

^a LADOT defines a significant intersection traffic impact as Project-related increase in the Volume to Capacity Ratio (V/C). For example, a project would not have a significant impact at a signalized intersection if it is operating at LOS C after the addition of project traffic and the incremental change in the V/C ratio is less than 0.040. However, if the intersection is operating at a LOS F after the addition of project traffic and the incremental change in V/C ratio is 0.010 or greater, the project would be considered to have a significant impact. No significant impacts are deemed to occur at LOS A or B.

Source: RAJU Associates, Inc., 2016

SC-T-2: **School Design Guide.** Vehicular access and parking shall comply with Section 2.3, Vehicular Access and Parking of the School Design Guide, January 2014. The Design Guide contains the following regulations related to traffic:

- Parking Space Requirements
- General Parking Guidelines
- Vehicular Access and Pedestrian Safety
- Parking Structure Security

Construction of the proposed project would include on-site demolition, excavation, stockpiling, and grading activities. In addition, trucks would be intermittently delivering building materials to the site. As a part of the project, a net cut of approximately 1,000 cubic yards of soil would be excavated and hauled from the project site. This would require 18 trucks with a capacity of fourteen cubic yards and three truck trips a day to remove the soils. As discussed in Response to Checklist Question XII.a, it is estimated there will only be one haul truck needed during excavation. During project construction, there could be up to 40 to 50 workers traveling to the site on an intermittent basis, and parking would be contained on the project site. In addition, these construction workers would be commuting from within the region and are already using the roadways. The surrounding roadways would be able to support this increase in traffic from construction workers and truck activity. 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.

LAUSD SC-T-2 requires compliance with the LAUSD School Design Guide during the project design phase and addresses the following regulations related to traffic: parking space requirements, general parking guidelines, vehicular access and pedestrian safety, and parking structure security.²⁰² LAUSD SC-T-4 would also be implemented prior to construction to further reduce potential construction related traffic impacts:²⁰³

SC-T-4: LAUSD shall require its contractors to submit a construction worksite traffic control plan to the City of County jurisdiction for review prior to construction. The plan will show the location of any haul routes, hours of operation, protective devices, warning signs, and access to abutting properties. LAUSD shall encourage its contractor to limit construction-related trucks to off-peak commute periods. As required by the California Department of Transportation (Caltrans), applicable transportation related safety measures shall be implemented during construction.

With implementation of LAUSD SC-T-2 and SC-T-4, implementation of the proposed project would not conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, and impacts would be less than significant. No mitigation measures or further evaluation are required.

b) Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards

²⁰² *Ibid*, at page 5.17-5.

²⁰³ *Ibid*, at pages 5.17-6.

established by the county congestion management agency for designated roads or highways?

Less Than Significant Impact. The CMP transportation impact analysis is conducted in accordance with the procedures outlined in the *2010 Congestion Management Program for Los Angeles County*.²⁰⁴ The CMP is a State-mandated program enacted by the State legislature to address the impacts that urban congestion has on local communities and the region as a whole. Metro is the local agency responsible for implementing the requirements of the CMP. New projects located in the City of Los Angeles must comply with the requirements set forth in the Metro's CMP. The nearest CMP arterial monitoring locations to the project site are:

- Ventura Boulevard and Lankershim Boulevard (CMP ID# 73)
- Ventura Boulevard and Laurel Canyon Boulevard (CMP ID# 74)

Based on the incremental project trip generations presented in Chapter VI, Regional/CMP Analysis, of the Traffic Study, the project would not conflict with CMP standards, since construction and operation of the proposed project would not add 50 or more new trips per hour to the streets adjacent to the CMP intersection during AM or PM peak hours, nor would it add 150 or more trips per hour to the Ventura Freeway (US-101) at Coldwater Canyon Avenue, in either direction, during the AM or PM peak periods.²⁰⁵ As discussed above, in Response to Checklist Question XVII.a, during project construction, there could be up to 40 or 50 workers on the site on an intermittent basis and a maximum of 18 haul trucks would access the site on any given day. Furthermore, incorporation of SC-T-4 would encourage construction-related truck activity to off-peak commuter periods. As such, the project would not conflict with the applicable construction management program, and impacts would be less than significant. No mitigation measures or further evaluation are required.

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 proposed site is not located within an area subject to an airport land use plan, within two miles of a public airport or public use airport, or within the vicinity of a private airstrip. The closest airport is the Bob Hope Airport, located approximately four miles northeast of the project site. Furthermore, projects conducted on existing campuses that do not involve the acquisition of new property, such as the proposed project, would not need to be reviewed for airport safety or noise.²⁰⁶ As such, no impact would occur in this regard. No mitigation measures or further evaluation are required.

²⁰⁴ Los Angeles County Metropolitan Transportation Authority, *2010 Congestion Management Program (2010)*. Website: http://media.metro.net/projects_studies/cmp/images/CMP_Final_2010.pdf. Accessed October 2016.

²⁰⁵ *Ibid*, at page 5.17-11.

²⁰⁶ *Ibid*, at pages 5.8-46 and 5.8-47.

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

No Impact. The proposed project would be designed in accordance with 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. In addition, the project would comply with the LAUSD School Design Guide Section 2.3, regarding vehicular access and parking. The project design would also be required to accommodate access by emergency vehicles, in accordance with LAFD regulations and local ordinances.²⁰⁷ The on-site fire lane access/service road would provide required emergency vehicle access. The project would not substantially increase hazards due to a design feature or incompatible uses, and there would be no impact in this regard. No mitigation measures or further evaluation are required.

e) Result in inadequate emergency access?

No Impact. As discussed in Response to Checklist Question XVII.a, the proposed project would be implemented in accordance with LAFD regulations and local ordinances, and the project would be required to accommodate access by emergency vehicles.²⁰⁸ The on-site fire lane access/service road would provide required emergency vehicle access. Therefore, there would be no impact in this regard. No mitigation measures or further evaluation are 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.

No Impact. Students, faculty and staff can currently travel to school using public transit routes, bicycles and by walking. As discussed above in Response to Checklist Questions XIII.a and XIII.b, the site is located within a mature network of pedestrian facilities, and the “Safe Routes to School” map for Colfax Charter Elementary School is in place to identify the most appropriate paths for students to walk to school. In addition, LAUSD encourages ride-sharing programs for students and teachers, as well as riding bicycles to school.²⁰⁹ Implementation of the proposed project would also include 45 new bicycle racks.

Transit service to the project site is provided by the Metro, which operates Bus Lines 155 and 183. Bus Line 155 operates in Valley Village along Riverside Drive, with the closest stop to the school two blocks away (about 0.15 mile) from the school at the corner of Colfax Street and Riverside Drive. Bus Line 183 also operates in Valley Village along Magnolia Boulevard, with the closest stop to the school located four blocks to the north, along Magnolia Boulevard and Colfax Street. Regional Service is provided by the Metro Orange Line Busway, along Chandler Boulevard, which offers a limited number of service stops for faster routes. The nearest Metro Orange Line Station is located at Laurel Canyon Boulevard and Chandler Boulevard, approximately 0.6 mile northwest of the school. Project construction and operation would have no impact on

²⁰⁷ *Ibid*, at pages 5.17-13 to 5.17-14.

²⁰⁸ *Ibid*.

²⁰⁹ *Ibid*, at page 5.17-12.

the performance or safety of public transit, bicycle or pedestrian facilities. No mitigation measures or further evaluation are required.

XVIII. TRIBAL CULTURAL RESOURCES

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

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

Less Than Significant Impact With Mitigation Incorporated (a-b). Public Resources Code section 5024.1(c) lists the criteria for listing in the California Register. It states that:

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

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

Assembly Bill 52 requires meaningful consultation with California Native American Tribes on potential impacts to tribal cultural resources (TCRs), as defined in Public Resources Code Section 21074. A TCR is a site feature, place, cultural landscape, sacred place, or object that is of cultural value to a tribe, AND is either 1) on or eligible for the California Historic Register or a local historic register, or 2) the lead agency, at its discretion, chooses to treat the resource as a TCR.

As part of the AB 52 process, Native American tribes must submit a written request to LAUSD (lead agency) to be notified of projects within their traditionally and culturally affiliated area. LAUSD must provide written, formal notification to those tribes within 14 days of deciding to undertake a project. The tribe must respond to LAUSD within 30 days of receiving this notification if they want to engage in consultation on the project, and LAUSD must begin the consultation process within 30 days of receiving the tribe's request. Consultation concludes when either 1): the parties agree to mitigation measures to avoid a significant effect on a tribal

cultural resource, or 2) a party, acting in good faith and after reasonable effort, concludes mutual agreement cannot be reached.

To date, LAUSD has not received any requests for notification or consultation from California Native American tribes regarding resources defined by Public Resources Code Section 21074. Therefore, AB 52 compliance has not been triggered for this project. Nevertheless, SC-CUL-1, SC-CUL-12, SC-CUL-13, SC-CUL-14, SC-CUL-16 and SC-CUL-17 would be implemented for further reduce potential impacts to tribal cultural resources. With incorporation of these LAUSD SCs, Tribal cultural resource impacts would be less than significant, and no further mitigation measures are required.

XIX. UTILITIES AND SERVICE SYSTEMS

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 within the Hyperion Treatment System, which includes the Hyperion Treatment Plant (HTP), the Tillman Water Reclamation Plant (TWRP) and the 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 water flow, resulting in available treatment capacity.^{210,211,212}

Following the secondary treatment of wastewater, the majority of effluent from the HTP is discharged into the Santa Monica Bay while the remaining flows are conveyed to the West Basin Water Reclamation Plant for tertiary treatment and reuse as reclaimed water. The HTP effluent is required to meet the Los Angeles Regional Water Quality Control Board's requirements for a recreational beneficial use, which imposes performance standards on water quality that are more stringent than the standards required under the Clean Water Act permit administered under the system's NPDES permit. Accordingly, the HTP effluent to Santa Monica Bay is continually monitored to ensure that it meets or exceeds prescribed standards. The Los Angeles County Department of Health Services also monitors flows into the Santa Monica Bay.

Construction of the project would include all necessary on- and off-site sewer pipe improvements and connections to adequately connect to the City's existing sewer system. The project would not generate sewer flows that would jeopardize the ability of the HTP to operate within its established wastewater treatment requirements. Furthermore, the LAUSD would obtain a NPDES permit from the Los Angeles Regional Water Quality Control Board with requirements for wastewater discharge, BMPs and a SWPPP. The District would comply with the effluent criteria as specified within the NPDES permit. There will be an

²¹⁰ *The HTP is an end-of-the-line plant, subject to diurnal and seasonal flow variation. It was designed to provide full secondary treatment for a maximum-month flow of 450 mgd, which corresponds to an average daily waste flow of 413 mgd, and peak wastewater flow of 850 mgd. (Information regarding peak flow is included in the City of Los Angeles Bureau of Sanitation Integrated Resources Plan, Facilities Plan, Volume 1, Wastewater Management, July 2004; page 7-3.)*

²¹¹ *City of Los Angeles Department of Public Works Bureau of Sanitation, Clean Water, Water Reclamation Plants, Hyperion Water Reclamation Plant, https://www.lacitysan.org/san/faces/wcnav_externalId/s-lsh-wwd-cw-p-hwrp?_adf.ctrl-state=1xj1csos2_150&_afLoop=27241725938238998#, accessed June 2016.*

²¹² *LAUSD School Upgrade Program Final Environmental Impact Report, September 2015, at pages 5.18-17.*

increase in enrollment, but the proposed project will accommodate existing and expected students that reside within the enrollment boundaries of the school. Project operation would not result in an exceedance of wastewater treatment requirements. As a result, the project would not exceed the requirements of the Los Angeles Regional Water Quality Control Board, and impacts would be less than significant. No mitigation measures or further evaluation are 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 effects?

Less Than Significant Impact. The proposed project would increase enrollment at Colfax Charter Elementary School, but the proposed project will accommodate existing and expected students that reside within the enrollment boundaries of the school. As such, no new water or wastewater treatment facilities or expansion of existing facilities would occur. The project site is served by an existing sewer collection and conveyance system maintained by the City of Los Angeles Bureau of Sanitation. Any on-site improvements and connections to off-site infrastructure would be provided by LAUSD. The SUP program is growth-accommodating rather than growth-inducing, and District-wide enrollment is projected to decline by about two percent over the next ten years.²¹³ As such, impacts to the existing sewer and conveyance systems would be less than significant, and the construction of new water or wastewater treatment facilities would not be required. No mitigation measures or further evaluation are required.

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

Less Than Significant Impact With Mitigation Incorporated. The proposed project would not 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. 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 reconstructed facilities included as PDFs would increase the pervious surfaces and include landscaping features which would reduce stormwater runoff from the project site. In addition, compliance with NPDES permit requirements, applicable laws, regulations, and standard LAUSD PDFs and practices during project construction and operation would ensure that impacts associated with runoff would not exceed the capacities of existing stormwater drainage systems.²¹⁴ Incorporation of LAUSD SCs USS-2 and GHG-1 to GHG-5 would ensure that impacts would be less than significant.²¹⁵

²¹³ *Ibid*, at pages 5.18-24 to 5.18-25.

²¹⁴ *Ibid*, at page 5.18-25.

²¹⁵ *Ibid*, at pages 5.18-5.

- SC-USS-2:** LAUSD shall coordinate with the City of Los Angeles Department of Water and Power or other appropriate jurisdictions and departments prior to the relocation or upgrade of any water facilities to reduce the potential for disruptions in service.

As a result, the project would not increase demand placed on adjacent stormwater infrastructure, and impacts would be less than significant. No mitigation measures or further evaluation are 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 With Mitigation Incorporated. There will be an increase in enrollment at Colfax Charter Elementary School, but the proposed project will accommodate existing and expected students that reside within the enrollment boundaries of the school. As such, the water supplies that would be utilized to serve students on the project site during operation would be very similar to current conditions. Furthermore, drought-tolerant vegetation would be planted and irrigation would be controlled by automatic timers, as required under LAUSD SCs. All planting on the project will be irrigated using a water efficient irrigation system and a new “Smart Weather” controller, which would be installed to replace the existing, inefficient irrigation system, currently covering approximately 20 percent of the school. Irrigation would be adjustable to minimize overspray on buildings and paving. All trees will be irrigated using a root watering bubbler system, and all planting areas would use efficient pop-up sprayers. The landscape plan would include a biofiltration system, to capture and treat stormwater runoff from the newly constructed structures and areas. The runoff will primarily be directed to an underground sump not affecting the planting areas. Incorporation of LAUSD SCs USS-2 and GHG-1 to GHG-5 would ensure that impacts would be less than significant.²¹⁶

With incorporation of SCs USS-2 and GHG-1 to GHG-5, impacts with respect to water supplies would be less than significant. No mitigation measures or further evaluation are required.

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?

Less Than Significant Impact. There will be an increase in enrollment, but the proposed project will accommodate existing and expected students that reside within the enrollment boundaries of the school. As such, the projected demands would not exceed the capacity of wastewater treatment providers serving the site. As discussed in Responses to Checklist Questions XVIII.a and XVIII.b, the project site is served by an existing sewer collection and conveyance infrastructure system maintained by the City of Los Angeles Bureau of Sanitation, and there is sufficient treatment capacity in the overall system. The proposed project would 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. As such, impacts to the existing sewer and conveyance systems would be less than

²¹⁶ *Ibid*, at pages 5.18-5.

significant, and the construction of new water or wastewater treatment facilities would not be required. No mitigation measures or further evaluation are required.

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

Less Than Significant Impact With Mitigation Incorporated. There are eight landfills used by the Los Angeles Regional Authority that will be available to accommodate the proposed project’s solid waste disposal needs. **Table B-13, Landfills Used by Los Angeles Regional Authority,** provides the landfill name and capacity remaining for the eight landfills.²¹⁷

Table B-13

Landfills Used by Los Angeles Regional Authority

<u>Landfill and Location</u>	<u>Current Remaining Capacity (cubic yards)</u>	<u>Estimated Close Date</u>	<u>Maximum Daily Loads (tons)</u>	<u>Average Daily Disposal, 2012 (tons)</u>
Antelope Valley Public Landfill City of Palmdale	20,400,000	2042	3,564	855
Calabasas Sanitary Landfill Community of Agoura, unincorporated Los Angeles County	18,100,000	2025	3,500	658
Chiquita Canyon Sanitary Landfill Community of Castaic, unincorporated Los Angeles County	29,300,000	2019	6,000	3,090
El Sobrante Landfill City of Corona, Riverside County	145,530,000	2045	16,054	6,426
Lancaster Landfill and Recycling Center City of Lancaster	27,700,000	2044	5,100	709
Olinda Alpha Sanitary Landfill	38,578,383	2021	8,000	5,210
Simi Valley Landfill and Recycling Center City of Simi Valley, Ventura County	119,600,000	2052	9,250	2,209
Sunshine Canyon City/County Landfill Community of Sylmar, City of Los Angeles	140,900,000	2037	12,100	5,174

Source: LAUSD School Upgrade Program Final Environmental Impact Report, September 2015, at pages 5.18-20 and 5.18-21.

²¹⁷ *Ibid*, at pages 5.18-20 and 5.18-21.

The proposed project would not expand total solid waste generation. The proposed project would be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs, as described in the Program EIR.²¹⁸ All projects implemented under the SUP would comply with applicable laws, regulations and LAUSD Standards and SCs. All SUP-related projects involving construction and/or demolition, including the proposed project, would comply with the construction and demolition waste recycling/reuse requirements of the California Green Building Standards Code Section 5.408, and LAUSD School Design and Specification 01340, Construction & Demolition Waste Management, as detailed under LAUSD SC-USS-1.²¹⁹

SC-USS-1: School Design Guide. Construction and demolition waste shall be recycled to the maximum extent feasible. LAUSD has established a minimum non-hazardous construction and demolition debris recycling requirement of 75% by weight as defined in Specification 01349, Construction & Demolition Waste Management.

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

There will be an increase in enrollment, but the proposed project will accommodate existing and expected students that reside within the enrollment boundaries of the school. As such, incorporation of LAUSD SC-USS-1 would ensure that impacts regarding solid waste disposal capacity would be less than significant. No mitigation measures or further evaluation are required.

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

No Impact. The proposed project would comply with LAUSD, federal, state, and local statutes and regulations related to solid waste. Construction of the proposed project would result in the generation of solid waste. Wastes generated during construction of the proposed project may include scrap lumber, concrete, residual waste, packaging materials, plastics and vegetation. To ensure optimal diversion of solid resources by a project, LAUSD requires its contractors to reuse, recycle, salvage or dispose of non-hazardous waste materials generated during demolition and/or new construction, to foster material recovery and reuse and to minimize disposal in landfills, as discussed in Response to Checklist Question XVIII.h. With the incorporation of LAUSD SC-USS-1, there would be no impacts during construction and operation of the project. Furthermore, the proposed project would comply with all city, county, and state solid waste

²¹⁸ *Ibid*, at pages 5.18-26.

²¹⁹ *Ibid*, at page 5.18-5.

diversion, reduction, and recycling mandates, thereby ensuring that there would be no impact in this regard. No mitigation measures or further evaluation are required.

XX. MANDATORY FINDINGS OF SIGNIFICANCE

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

Less Than Significant Impact. Based on the information provided above, the proposed project would not substantially degrade the quality of the environment, due the fact that all environmental issue areas have a less than significant or no impact. There would be negligible impacts to biological resources or their habitats. No important examples of California history or prehistory would be significantly affected by the proposed project.

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

Less Than Significant Impact. Cumulative impacts are concluded to be less than significant for those issues for which it has been determined that the proposed project would have no impact. Environmental issues meeting this criterion include agricultural resources, land use, mineral resources, population and housing, and recreation. Incorporation of LAUSD SCs and compliance with LAUSD Standards and applicable federal, state and City regulations would preclude significant cumulative impacts with regard to the remaining environmental issue areas analyzed in this MND. Furthermore, it was concluded in the above evaluation that the proposed project would result in less than significant impacts to all other remaining issue areas. As such, no significant cumulatively considerable impacts would occur as a result of the proposed project.

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

Less Than Significant Impact. Based on the documentation provided above, implementation of the proposed project would not cause environmental effects that cause substantial direct or indirect adverse effects on human beings.

ATTACHMENT C

MITIGATION MONITORING AND REPORTING PROGRAM

ATTACHMENT C: MITIGATION MONITORING AND REPORTING PROGRAM

This Mitigation Monitoring and Reporting Program (MMRP) has been prepared pursuant to Public Resources Code Section 21081.6, which requires adoption of a MMRP for projects in which the Lead Agency has required changes or adopted mitigation to avoid significant environmental effects. LAUSD is the Lead Agency for the proposed Colfax Charter Elementary School Classroom Addition Project (the Project) and therefore is responsible for administering and implementing the MMRP. As no mitigation measures were required by the Final Program EIR, LAUSD Standard Conditions of Approval (SC) were adopted by the Board of Education and incorporated into this project. The conditions provide sufficient performance standards for projects to reduce environmental impacts.

Description	Timing	Responsible Monitoring Party	Responsible Implementing Party	Status of Implementation
STANDARD CONDITIONS OF APPROVAL (SC) / MITIGATION MEASURES (MM)				
Aesthetics				
SC-AE-3 LAUSD shall assess a proposed project’s consistency with the general character of the surrounding neighborhood, including any propose 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.	Pre-construction	LAUSD Facilities Services Division – Modernization	LAUSD Facilities Services Division – Modernization	
SC-AE-4 <u>Marquee Sign Bulletin BUL-5004.1</u> . This policy provides guidance for the procurement and installation of marquee signs (outdoor sign with electronic message display) on District campuses. The policy includes requirements for the design, approval, placement, operation, and maintenance of electronic school marquees erected and operated at LAUSD schools. The policy also includes measured to mitigate light and glare, such as the use of “luminaries” in connection with school construction	Pre-construction	LAUSD Facilities Services Division – Modernization	LAUSD Facilities Services Division – Modernization	

ATTACHMENT C (Continued)

Mitigation Monitoring and Reporting Program

Description	Timing	Responsible Monitoring Party	Responsible Implementing Party	Status of Implementation
<p>SC-AE-6 <i>School Design Guide</i>. This document outlines requirements for lighting and measurements to minimize glare for pedestrians, drivers and sports teams, and to avoid light spilling onto adjacent properties.</p>	Pre-construction	LAUSD Facilities Services Division – Modernization	LAUSD Facilities Services Division – Modernization	
<p>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.</p>	Construction	LAUSD Facilities Services Division – Modernization	LAUSD Facilities Services Division – Modernization	
<p>SC-AE-8 Design site lighting and select lighting styles and technologies to have minimal impact off-site and minimal contribution to sky glow. Minimize outdoor lighting of architectural and landscape features and design interior lighting to minimize trespass outside from the interior.</p> <p>International Dark-Sky Association (IDA) and the Illuminating Engineering Society (IES) Model Lighting Ordinance (MLO) shall be used a guide for environmentally responsible outdoor lighting. The MLO outdoor lighting has outdoor lighting standards that reduce glare, light trespass, and skyglow. The Joint IDA-IESNA Model Outdoor Lighting Ordinance (MLO) uses lighting zones (LZ0-4) which allow the District to vary the stringency of lighting restrictions according to the sensitivity of the area as well as consideration for the community. The MLO also incorporates the Backlight-Uplight-Glare (BUG) rating system for luminaires, which provides more effective control of unwanted light. IDA-IESNA Model establishes standards to:</p>	Pre-construction	LAUSD Facilities Services Division – Modernization	LAUSD Facilities Services Division – Modernization	

ATTACHMENT C (Continued)

Mitigation Monitoring and Reporting Program

Description	Timing	Responsible Monitoring Party	Responsible Implementing Party	Status of Implementation
<ul style="list-style-type: none"> Limit the amount of light that can be used Minimize glare by controlling the amount of light that tends to create glare Minimize sky glow by controlling the amount of uplight Minimize the amount of off-site impacts or light trespass 				
Air Quality				
<p>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.</p>	Construction	LAUSD Facilities Services Division – Modernization	LAUSD Facilities Services Division – Modernization	
<p>SC-AQ-4 LAUSD shall prepare an air quality assessment. If site-specific review of a school construction project identifies potentially significant adverse regional and localized construction air quality impacts, then LAUSD shall implement all easible measures to reduce air emissions below the South Coast Air Quality Management District’s (SCAQMD) regional and localized significance thresholds.</p> <p>LAUSD shall mandate that construction bid contracts include 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"> Schedule construction activities that affect traffic flow to off-peak hours (e.g. between 10:00 AM and 3:00 PM). Consolidate truck deliveries and/or limit the number of 	Post-construction	LAUSD, Office of Environmental Health and Safety	LAUSD, Office of Environmental Health and Safety	

ATTACHMENT C (Continued)

Mitigation Monitoring and Reporting Program

Description	Timing	Responsible Monitoring Party	Responsible Implementing Party	Status of Implementation
<p>haul trips per day.</p> <ul style="list-style-type: none"> • Route construction trucks off congested streets. • Employ high pressure fuel injection systems or engine timing retardation. • Utilize ultra-low sulfur diesel fuel, containing 15 ppm sulfur or less (ULSD) in all diesel construction equipment. • Use construction equipment rated by the United States Environmental Protection Agency as having Tier 3 (model year 2006 or newer) or Tier 4 (model year 2008 or newer) emission limits for engines between 50 and 750 horsepower. • Restrict non-essential diesel engine idle time, to not more than five consecutive minutes. • Utilize electrical power rather than internal combustion engine power generators as soon as feasible during construction. • Utilize electric or alternatively fueled equipment, if feasible. • Utilize construction equipment with the minimum practical engine size. • Utilize low-emission on-road construction fleet vehicles. • Ensure construction equipment is properly serviced and maintained to the manufacturer’s standards. <p><u>Fugitive Dust</u></p> <ul style="list-style-type: none"> • Apply non-toxic soil stabilizers according to manufacturers’ specification to all inactive construction areas (previously graded areas inactive for ten days or more). • Replace ground cover in disturbed areas as quickly as 				

ATTACHMENT C (Continued)

Mitigation Monitoring and Reporting Program

Description	Timing	Responsible Monitoring Party	Responsible Implementing Party	Status of Implementation
<p>possible.</p> <ul style="list-style-type: none"> • Sweep streets at the end of the day if visible soil material is carried onto adjacent public paved roads (recommend water sweepers with reclaimed water). • Install wheel washers where vehicles enter and exit unpaved roads onto paved roads, or wash off trucks and any equipment leaving the site each trip. • Pave construction roads that have a traffic volume of more than 50 daily trips by construction equipment, and/or 150 daily trips for all vehicles. • Pave all construction access roads for at least 100 feet from the main road to the project site. • Water the disturbed areas of the active construction site at least three times a day, except during periods of rainfall. • Enclose, cover, water twice daily, or apply non-toxic soil binders according to manufacturers' specifications to exposed piles (i.e., gravel, dirt, and sand) with a five percent or greater silt content. • Suspend all excavating and grading operations when wind speeds (as instantaneous gusts) exceed 25 miles per hour (mph). • Apply water at least three times daily, except during periods of rainfall, to all unpaved road surfaces. • Limit traffic speeds on unpaved roads to 15 mph or less. • Prohibit high emission causing fugitive dust activities on days where violations of the ambient air quality standard have been forecast by SCAQMD. • Tarp and/or maintain a minimum of 24 inches of freeboard on trucks hauling dirt, sand, soil, or other loose 				

ATTACHMENT C (Continued)

Mitigation Monitoring and Reporting Program

Description	Timing	Responsible Monitoring Party	Responsible Implementing Party	Status of Implementation
<p>materials.</p> <ul style="list-style-type: none"> Limit the amount of daily soil and/or demolition debris loaded and hauled per day. <p><u>General Construction</u></p> <ul style="list-style-type: none"> Utilize ultra-low VOC or zero-VOC surface coatings. Phase construction activities to minimize maximum daily emissions. Configure construction parking to minimize traffic interference. Provide temporary traffic control during construction activities to improve traffic flow (e.g., flag person). Develop a trip reduction plan for construction employees. Implement a shuttle service to and from retail services and food establishments during lunch hours. Increase distance between emission sources to reduce near-field emission impacts. Require construction contractors to document compliance with the identified mitigation measures 				
<p>SC-AQ-5 LAUSD shall encourage ride-sharing programs for students and teachers as well as maintain fleet vehicles such as school buses, maintenance vehicles, and other service fleet vehicles in good condition in order to prevent significant increases in air pollutant emissions created by operation of a new school.</p>	Post-construction	LAUSD, Office of Environmental Health and Safety	LAUSD, Office of Environmental Health and Safety	
Biological Resources				
<p>SC-BIO-3 LAUSD shall comply with the following:</p> <ul style="list-style-type: none"> Project activities (including, but not limited to, staging and disturbances to active and nonnative vegetation, structures, 	Construction	LAUSD Facilities Services Division –	LAUSD Facilities Services Division – Modernization	

ATTACHMENT C (Continued)

Mitigation Monitoring and Reporting Program

Description	Timing	Responsible Monitoring Party	Responsible Implementing Party	Status of Implementation
<p>and substrates) should occur outside of avian breeding season to avoid take of birds or their eggs. Depending on the avian species present, a qualified biologist may determine that a change in the breeding season dates is warranted.</p> <ul style="list-style-type: none"> If avoidance of the avian breeding season is not feasible, beginning 30 days prior to the initiation of the project activities, a qualified biologist with experience in conducting breeding bird surveys shall conduct weekly bird surveys to detect protected native birds occurring in suitable nesting habitat that is to be disturbed and (as access to adjacent areas allows) any other such habitat within 300 feet of the disturbance area (within 500 feet for raptors). The surveys shall continue on a weekly basis with the last survey being conducted no more than three days prior to the initiation of project activities. If a protected native bird is found, LAUSD shall delay all project activities within 300 feet of the suitable nesting habitat (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 		Modernization		

ATTACHMENT C (Continued)

Mitigation Monitoring and Reporting Program

Description	Timing	Responsible Monitoring Party	Responsible Implementing Party	Status of Implementation
<p>protection of native birds.</p> <ul style="list-style-type: none"> If the qualified biologist determined 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 the LAUSD OEHS project manager. Construction contractors can then reduce the demarcated buffer. No construction shall occur within the fenced next zone until the young have fledged, are no longer being fed by the parents, have left the nest, and will no longer be impacted by the construction. A biological monitor shall be present on site during all grubbing and clearing of vegetation to ensure that these activities remain outside the demarcated buffer and that the flagging, stakes, and/or construction fencing are maintained, and to minimize the likelihood that active nests are abandoned or fail due to project activities. The biological monitor shall send weekly monitoring reports to LAUSD OEHS project manager during the grubbing and clearing of vegetation, and shall notify LAUSD immediately if project activities damage avian nests. 				
<p>SC-BIO-4 If there is removal of any native mature oak trees or woodland habitat, LAUSD shall comply with the following:</p> <ul style="list-style-type: none"> Migration 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 	<p>Construction and Post-construction</p>	<p>LAUSD Facilities Services Division – Modernization and LAUSD, Office of</p>	<p>LAUSD Facilities Services Division – Modernization and LAUSD, Office of Environmental Health and</p>	

ATTACHMENT C (Continued)

Mitigation Monitoring and Reporting Program

Description	Timing	Responsible Monitoring Party	Responsible Implementing Party	Status of Implementation
<p>implementation of translocation is rare. Even if translocation is initially successful, it will typically fail to persist over time.</p> <ul style="list-style-type: none"> • Permanent conservation of habitat. To ensure the conservation of sensitive plant species, the preferred method is permanent conservation of habitat containing these species; any translocation proposed shall only be an experimental component of a larger, more robust plan. • Off-site acquisition of woodland habitat. Due to the inherent difficulty in creating functional woodland habitat with associated understory components, the preferred method is off-site acquisition of woodland habitat in the local area. All acquired habitat shall be protected under a conservation easement and deeded to a local land conservancy for management and protection. • Creation of oak woodlands. Any creation of functioning woodlands shall be of similar composition, structure, and function of the affected oak woodland. The new woodland shall mimic the function, demonstrate recruitment, plant density, and percent basal, canopy, and vegetation cover, as well as other measurable success criteria before the measure is deemed a success. <ul style="list-style-type: none"> ○ All seed and shrub sources used for tree and understory species in the new planting site shall be collected or grown from on-site sources or from adjacent areas and shall not be purchased from a supplier. This method should reduce the risk of introducing diseases and pathogens into areas where they might not currently exist. ○ Oaks should be replaced by planting acorns because this has been shown to result in greater oak survival. 		Environmental Health and Safety	Safety	

ATTACHMENT C (Continued)

Mitigation Monitoring and Reporting Program

Description	Timing	Responsible Monitoring Party	Responsible Implementing Party	Status of Implementation
<p>Monitoring efforts, including the exclusion of herbivores, shall be employed to maximize seeding survival during the monitoring period.</p> <ul style="list-style-type: none"> ○ Monitoring period for oak woodlands shall be at least 10 years with a minimum of seven years without supplemental irrigation. This allows the trees to go through 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. 				
Cultural Resources				
<p>SC-CUL-1: <i>OEHS CEQA Specification Manual, Appendix H, Historical Resources Policy.</i> This document establishes assessment methodology and procedures for the identification and analysis of historical resources, unique archaeological resources, and paleontological resources pursuant to CEQA.</p>	Pre-construction	LAUSD, Office of Environmental Health and Safety	LAUSD, Office of Environmental Health and Safety	
<p>SC-CUL-12: 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).</p>	Construction	LAUSD Facilities Services Division – Modernization	LAUSD Facilities Services Division – Modernization	
<p>SC-CUL-13 The contractor shall halt construction activities in the immediate area and notify the LAUSD. LAUSD shall retain a qualified archaeologist to make an immediate evaluation of significance and appropriate treatment of the resource. To complete this assessment, the qualified archaeologist will be afforded the necessary time to recover, analyze, and curate the</p>	Construction	LAUSD Facilities Services Division – Modernization	LAUSD Facilities Services Division – Modernization	

ATTACHMENT C (Continued)

Mitigation Monitoring and Reporting Program

Description	Timing	Responsible Monitoring Party	Responsible Implementing Party	Status of Implementation
<p>find. The qualified archaeologist shall recommend the extent of archaeological 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.</p>				
<p>SC-CUL-14: 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 archaeological resources are buried on the site; and/or (2) when unique architectural 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.</p>	Construction	LAUSD Facilities Services Division – Modernization	LAUSD Facilities Services Division – Modernization	
<p>SC-CUL-16: 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.</p>	Construction	LAUSD Facilities Services Division – Modernization	LAUSD Facilities Services Division – Modernization	
<p>SC-CUL-17: LAUSD shall determine whether it is feasible to prepare and implement a Phase III Data Recovery/Mitigation Program. A Phase III Data Recovery/Mitigation Program would be designed by a Qualified Archaeologist to recover a statistically valid sample of the archaeological remains and to document the site to a level where the impacts can be determined to be less than significant. All documentation shall be prepared in the standard format of the ARM R Guidelines, as prepared by the OHP. Once a Phase III Data Recovery/Mitigation Program is completed, an archaeological monitor shall be present on site to oversee the grading, demolition activities, and/or initial construction</p>	Construction	LAUSD Facilities Services Division – Modernization	LAUSD Facilities Services Division – Modernization	

ATTACHMENT C (Continued)

Mitigation Monitoring and Reporting Program

Description	Timing	Responsible Monitoring Party	Responsible Implementing Party	Status of Implementation
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-19 LAUSD shall have a paleontological monitor on-call during construction activities. This monitor shall provide the construction crew(s) with a brief summary of the sensitivity, the rationale behind the need for protection of these resources, and information on the initial identification of paleontological resources. If paleontological resources are uncovered during construction, the on-call paleontologist shall be notified and afforded the necessary time and funds to recover, analyze, and curate the find(s). Subsequently, the monitor shall remain on-site for the duration of the ground disturbance to ensure the protection of any other resources that may be in the area.	Construction	LAUSD Facilities Services Division – Modernization	LAUSD Facilities Services Division – Modernization	
Geology and Soils				
SC-GEO-1 <u>OEHS CEQA Specification Manual, Appendix G Supplemental Geohazard Assessment Scope of Work</u> . This document outlines the procedures and scope for LAUSD geohazard assessments.	Pre-construction	LAUSD, Office of Environmental Health and Safety	LAUSD, Office of Environmental Health and Safety	
Greenhouse Gas Emissions				
SC-GHG-1 During school operation, LAUSD shall perform regular preventative maintenance on pumps, valves, piping, and tanks to minimize water loss	Post-occupancy	LAUSD Facilities Services Division – Modernization	LAUSD Facilities Services Division – Modernization	

ATTACHMENT C (Continued)

Mitigation Monitoring and Reporting Program

Description	Timing	Responsible Monitoring Party	Responsible Implementing Party	Status of Implementation
SC-GHG-2 LAUSD shall utilize automatic sprinklers set to irrigate landscaping during the early morning hours to reduce water loss from evaporation.	Post-occupancy	LAUSD Facilities Services Division – Modernization	LAUSD Facilities Services Division – Modernization	
SC-GHG-3 LAUSD shall reset automatic sprinkler timers to water less during cooler months and during the rainy season.	Post-occupancy	LAUSD Facilities Services Division – Modernization	LAUSD Facilities Services Division – Modernization	
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 Department of California Water Resources	Post-occupancy	LAUSD Facilities Services Division – Modernization	LAUSD Facilities Services Division – Modernization	
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	Post-occupancy	LAUSD Facilities Services Division – Modernization	LAUSD Facilities Services Division – Modernization	
Hydrology and Water Quality				
SC-HWQ-1 <i>Stormwater Technical Manual</i> . 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 the Maximum Extent Practicable (MEP). While these guidelines	Construction	LAUSD Facilities Services Division – Modernization	LAUSD Facilities Services Division – Modernization	

ATTACHMENT C (Continued)

Mitigation Monitoring and Reporting Program

Description	Timing	Responsible Monitoring Party	Responsible Implementing Party	Status of Implementation
meet current post-construction Standard Urban Stormwater Mitigation Plan (SUSMP) requirements. The guidelines address the mandated post-construction element of the NPDES program requirements				
Noise				
SC-N-5 LAUSD Facilities Division or its construction contractor shall consult and coordinate with the school principal or site administrator, and other nearby noise sensitive land uses prior to construction to schedule high noise or vibration producing activities to minimize disruption. Coordination between the school, nearby land uses and the construction contractor shall continue on an as-needed basis throughout the construction phase of the project to reduce school and other noise sensitive land use disruptions.	Construction	LAUSD Facilities Services Division – Modernization	LAUSD Facilities Services Division – Modernization	
Pedestrian Safety				
SC-PED-4 <i>School Traffic Safety Reference Guide REF-4492.1</i> . This Reference Guide replaces Reference Guide 4492.0, School Traffic Safety, September 30, 2008. Updated information is provided, including new guidance on passenger loading zones and the Safety Valet Program. Guide sets forth requirements for traffic and pedestrian safety, and procedures for school principals to request assistance from OEHS, the Los Angeles Schools Police Department (LASPD), or the local police department regarding traffic and pedestrian safety. Distribution and posting of the Back to School Safety Tips flyer is required. This guide also includes procedures for traffic surveys, parking restrictions, crosswalks, advance warning signs (school zone), school parking signage, traffic controls, crossing guards, or for determinations on whether vehicle enforcement is required to ensure the safety of students and staff.	Pre-occupancy	LAUSD Office of Environmental Health and Safety	LAUSD Office of Environmental Health and Safety	

ATTACHMENT C (Continued)

Mitigation Monitoring and Reporting Program

Description	Timing	Responsible Monitoring Party	Responsible Implementing Party	Status of Implementation
<p>SC-PED-5 <i>School Design Guide</i>. The Guide states student drop-off and pick-up, bus loading areas, and parking areas shall be separated to allow students to enter and exit the school grounds safely.</p>	Construction	LAUSD Facilities Services Division – Modernization	LAUSD Facilities Services Division – Modernization	
Transportation/Traffic				
<p>SC-T-2 <i>School Design Guide</i>. Vehicular access and parking shall comply with Section 2.3, Vehicular Access and Parking of the School Design Guide, January 2014. The Design Guide contains the following regulations related to traffic:</p> <ul style="list-style-type: none"> • Parking Space Requirements • General Parking Guidelines • Vehicular Access and Pedestrian Safety • Parking Structure Security. 	Construction	LAUSD Facilities Services Division – Modernization	LAUSD Facilities Services Division – Modernization	
<p>SC-T-4: LAUSD shall require its contractors to submit a construction worksite traffic control plan to the City of County jurisdiction for review prior to construction. The plan will show the location of any haul routes, hours of operation, protective devices, warning signs, and access to abutting properties. LAUSD shall encourage its contractor to limit construction-related trucks to off-peak commute periods. As required by the California Department of Transportation (Caltrans), applicable transportation related safety measures shall be implemented during construction.</p>	Pre-construction	LAUSD Facilities Services Division – Modernization	LAUSD Facilities Services Division – Modernization	

ATTACHMENT C (Continued)

Mitigation Monitoring and Reporting Program

Description	Timing	Responsible Monitoring Party	Responsible Implementing Party	Status of Implementation
Utilities and Service Systems				
<p>SC-USS-1 <i>School Design Guide</i>. 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 01349, Construction & Demolition Waste Management.</p> <p><i>Guide Specifications 2004 – Section 01340, Construction & Demolition Waste Management</i>. This section of the LAUSD Specifications includes procedures for preparation and implementation, including reporting and documentation, of a Waste Management Plan for reusing, recycling, salvage or disposal of non-hazardous waste materials generated during demolition and/or new construction (Construction & Demolition (C&D) Waste), to foster material recovery and re-use and to minimize disposal in landfills. Requires the collection and separation of all C&D waste materials generated on-site, reuse or recycling on-site, transportation to approved recyclers or reuse organizations, or transportation to legally designated landfills, for the purpose of recycling salvaging and/or reusing a minimum of 75% of the C&D waste generated.</p>	Construction	LAUSD Facilities Services Division – Modernization	LAUSD Facilities Services Division – Modernization	
<p>SC-USS-2 LAUSD shall coordinate with the City of Los Angeles Department of Water and Power or other appropriate jurisdictions and departments prior to the relocation or upgrade of any water facilities to reduce the potential for disruptions in service</p>	Construction	LAUSD Facilities Services Division – Modernization	LAUSD Facilities Services Division – Modernization	

Source: PCR Services Corporation, 2016.

ATTACHMENT D

RESPONSES TO COMMENTS

ATTACHMENT D - RESPONSES TO COMMENTS

This chapter of the Final MND presents the 14 comment letters submitted during the public comment period for the Draft MND from public agencies, as well as from organizations and/or private individuals. A list of commenters is provided in Table D-1, *Summary of Comment Letters and Commenters*. The letters are assigned a numerical identifier, as indicated in Table D-1. Each comment that requires a response within the letters has been assigned a number. For example, the first comment in Letter No. 1 would be Comment 1-1, and the fourth comment in Letter 2 would be Comment 2-4. The responses to each comment are then correspondingly numbered (i.e., Response 1-1 and Response 2-4). Each comment has been recopied verbatim, or as close as possible to verbatim, from the original letter submitted. The original comment letters are provided in Appendix H of this Final MND.

Table D-1

Summary of Comment Letters and Commenters

Comment Letter Number	Commenter Name
1	Gayle Totton – Native American Heritage Commission February 7, 2017, email correspondence
2	Carlyn Lampert – Area Resident February 10, 2017, email correspondence
3	Carlyn Lampert – Area Resident February 10, 2017, email correspondence
4	Lisa Walco February 12, 2017, email correspondence
5	Joanna Belson – Parent of Colfax Student February 14, 2017, email correspondence
6	Kira Goldberg – Parent of Colfax Student February 14, 2017, email correspondence
7	Lynne Gelman – Parent of Colfax Student February 14, 2017, email correspondence
8	Lucina Guerrero – Parent of Colfax Student February 14, 2017, email correspondence
9	Andrea Sirota – Parent of Colfax Student February 14, 2017, email correspondence
10	Dianna Watson – California Department of Transportation February 21, 2017, email correspondence
11	David Shluker – Area Resident February 24, 2017, email correspondence
12	Jerry Baruck – Area Resident March 2, 2017, email correspondence
13	Karen Kaysing – Area Resident March 2, 2017, email correspondence
14	Dan Caplan March 5, 2017, email correspondence

Letter No. 1

Gayle Totton – Native American Heritage Commission
February 7, 2017, email correspondence

Comment No. 1-1

The Native American Heritage Commission (NAHC) has reviewed the Mitigated Negative Declaration prepared for the project referenced above. The review included the Introduction and Project Description, the Initial Study Checklist, and the Explanation of Checklist Determinations, prepared by ESA/PCR for the Los Angeles Unified School District. We have the following concerns:

Response No. 1-1

This comment is introductory in nature and does not pertain to the content of the Draft MND. As such, no further response is required.

Comment No. 1-2

While documentation of no government-to-government consultation with Native American tribes traditionally and culturally affiliated to the project area by the lead agency under AB-52 shows technical fulfillment of the law, please refer to the NAHC Best Practices for Consultation at http://nahc.ca.gov/wR-content/uP.loads/2015/04/AB52TribalConsultationRequirementsAndBestPractices_Revised_3_9_16.pdf.

Response No. 1-2

The District has not received any requests for notification for consultation from California Native America tribes regarding resources defined by Public Resources Code Section 21074. Therefore, AB 52 compliance was fulfilled for this project.

Comment No. 1-3

There are no mitigation measures specifically addressing Tribal Cultural Resources separately. Mitigation measures must take Tribal Cultural Resources into consideration as required under AB-52, with or without consultation occurring. Mitigation language for archaeological resources is not always appropriate for or similar to measures specifically for handling Tribal Cultural Resources. Mitigation Measure SC-CUL-13 refers to archaeological "recovery, analysis, and curation".

Response No. 1-3

As discussed in the Draft MND, Section V., *Cultural Resources*, the project will not include excavation into previously undisturbed native soils, as the site includes areas with existing structures and a turf field, with no known archaeological or paleontological context. The site has been subject to past subsurface disturbance associated with grading and foundations. The site is not considered sensitive for the presence of tribal cultural resources.

Although no specific tribal cultural resources Mitigation Measures were listed in the Draft MND, note that there are seven other Mitigation Measures listed, including SC-CUL-1, SC-CUL-12, SC-CUL-13, SC-CUL-14, SC-CUL-16 and SC-CUL-17. Implementation of these measures would ensure that impacts related to the accidental discovery of human remains would be less than significant. SC-CUL-1 establishes methodology and procedures for identification and analysis of historical, archaeological, and paleontological resources. SC-CUL-12 and SC-

CUL-14 state that LAUSD shall retain a qualified archaeologist to be available on-call and for the archaeologist to prepare an archaeological monitoring program for construction activities. SC-CUL-16 requires that the archaeologist conduct cultural resources sensitivity training for all construction workers involved in moving soil or working near soil disturbance. SC-CUL-17 states that LAUSD shall determine whether it is feasible to prepare and implement a Phase III Data Recovery/Mitigation Program to recover archaeological remains and to document the site to a level where the impacts can be determined to be less than significant. The monitor must be present on site to oversee any construction activities to ensure that the construction proceeds in accordance with the adopted Program.

While SC-CUL-13 is indeed focused on archaeological resource recovery, it provides for an archaeological monitor to halt construction activities in the area of a discovery so an immediate evaluation of significance and appropriate treatment of the resource can be determined. SC-CUL-1, requires application of OEHS's CEQA Specification Manual, Appendix H, Historical Resources Policy, which establishes assessment methodology and procedures for the identification of historical resources, unique archaeological resources, and paleontological resources pursuant to CEQA. Should a tribal cultural resource be discovered, the existing protocols described in these Mitigation Measures would be applicable, as would California Health and Safety Code Section 7050.5 and California Public Resources Code Sections 5097.9-5097.991, as provided in the LAUSD School Upgrade Program Environmental Impact Report, which are related to the discovery of human remains and contacting the coroner or tribal representatives if a tribal resource is suspected. As such, SC-CUL-1, SC-CUL-12, SC-CUL-13, SC-CUL-14, SC-CUL-16 and SC-CUL-17 will be applicable to mitigating potential impacts to tribal cultural resources, in Final MND Section XVIII, *Tribal Cultural Resources*.

Comment No. 1-4

Cultural Resources and Tribal Cultural Resources assessments are not documented (Historic Resources only). These should adequately assess the existence and significance of tribal cultural resources and plan for avoidance, preservation in place, or barring both, mitigation of project-related impacts to tribal cultural resources.

Response No. 1-4

As explained in the Project Description of the Draft MND (pages A-1 and A-2), the Draft MND incorporates by reference the LAUSD School Upgrade Program Environmental Impact Report, which provides programmatic environmental review for the School Upgrade Program in accordance with CEQA.¹ Refer to the discussion and protocols in place regarding the discovery of unknown tribal cultural resources, therein (pages 5.5-36 to 5.5-38). With implementation of the listed standard conditions, District protocols, and regulatory compliance measures, impacts to tribal cultural resources for LAUSD School Upgrade Program projects are considered less than significant.

As provided in Response No. 1-3 above, the Mitigation Measures listed plan for avoidance, preservation and mitigation of potential impacts to all cultural resources listed in the CEQA Environmental Checklist, including historical resources, archaeological resources, paleontological resources, and buried remains.

Comment No. 1-5

The California Environmental Quality Act (CEQA) specifically Public Resources Code section 21084.1, states that a project that may cause a substantial adverse change in the significance of a historical resource is a project that may have a significant effect on the environment. If there is substantial evidence, in light of the

¹ LAUSD School Upgrade Program Final Environmental Impact Report, September 2015. Available at: http://achieve.lausd.net/cms/lib08/CA01000043/Centricity/domain/135/pdf%20files/Final_EIR.pdf.

whole record before a lead agency, that a project may have a significant effect on the environment, an environmental impact report (EIR) shall be prepared. In order to determine whether a project will cause a substantial adverse change in the significance of a historical resource, a lead agency will need to determine whether there are historical resources with the area of project effect (APE).

Response No. 1-5

This comment is not related to an environmental issue in the Draft MND. The text provides a description of legal requirements under CEQA.

Comment No. 1-6

CEQA was amended in 2014 by Assembly Bill 52. (AB 52). AB 52 applies to any project for which a notice of preparation or a notice of negative declaration or mitigated negative declaration is filed on or after July 1, 2015. AB 52 created a separate category for "tribal cultural resources" that now includes "a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment. Public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource.

Response No. 1-6

The comment provides a description of new legal requirements under CEQA, to consider potential impacts to tribal cultural resources. In the Draft MND, a separate section of the CEQA Environmental Checklist related to tribal cultural resources is included.

Comment No. 1-7

Your project may also be subject to Senate Bill 18 (SB 18) (Burton, Chapter 905, Statutes of 2004), Government Code 65352.3, if it also involves the adoption of or amendment to a general plan or a specific plan, or the designation or proposed designation of open space. Both SB 18 and AB 52 have tribal consultation requirements. Additionally, if your project is also subject to the federal National Environmental Policy Act (42 U.S.C. § 4321 et seq.) (NEPA), the tribal consultation requirements of Section 106 of the National Historic Preservation Act of 19668 may also apply.

Response No. 1-7

The project is not subject to SB 18, as the project does not involve the adoption of or amendment to a general plan, specific plan, or the designation of open space.

Comment No. 1-8

Consult your legal counsel about compliance with AB 52 and SB 18 as well as compliance with any other applicable laws.

Response No. 1-8

This comment is not related to an environmental issue in the Draft MND, and no further comment is required. Nevertheless, LAUSD's legal counsel was consulted regarding this project.

Comment No. 1-9

Agencies should be aware that AB 52 does not preclude agencies from initiating tribal consultation with tribes that are traditionally and culturally affiliated with their jurisdictions before the timeframes provided in AB 52. For that reason, we urge you to continue to request Native American Tribal Consultation Lists and Sacred Lands File searches from the NAHC. The request forms can be found online at: <http://nahc.ca.gov/resources/forms/>. Additional information regarding AB 52 can be found online at http://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation_CalEPAPDF.pdf entitled "Tribal Consultation Under AB 52: Requirements and Best Practices".

The NAHC recommends lead agencies consult with all California Native American tribes that are traditionally and culturally affiliated with the geographic area of your proposed project as early as possible in order to avoid inadvertent discoveries of Native American human remains and best protect tribal cultural resources.

A brief summary of portions of AB 52 and SB 18 as well as the NAHC's recommendations for conducting cultural resources assessments is also attached.

Please contact me at gayle.totton@nahc.ca.gov or call (916) 373-3710 if you have any questions.

Response No. 1-9

This comment is not related to an environmental issue in the Draft MND, and no further comment is required. LAUSD appreciates the information provided by NAHC and the list of suggestions and resources provided, and it has already incorporated many of these recommendations into the School Upgrade Program Environmental Impact Report which applies to this project.

Comment No. 1-10

Pertinent Statutory Information:

Under AB 52:

AB 52 has added to CEQA the additional requirements listed below, along with many other requirements:

Within fourteen (14) days of determining that an application for a project is complete or of a decision by a public agency to undertake a project, a lead agency shall provide formal notification to a designated contact of, or tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice.

A lead agency shall begin the consultation process within 30 days of receiving a request for consultation from a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project and prior to the release of a negative declaration, mitigated negative declaration or environmental impact report. For purposes of AB 52, "consultation shall have the same meaning as provided in Gov. Code § 65352.4 (SB 18).

The following topics of consultation, if a tribe requests to discuss them, are mandatory topics of consultation:

- a. Alternatives to the project.
- b. Recommended mitigation measures.
- c. Significant effects.

1. The following topics are discretionary topics of consultation:

- a. Type of environmental review necessary.
- b. Significance of the tribal cultural resources.
- c. Significance of the project's impacts on tribal cultural resources.

If necessary, project alternatives or appropriate measures for preservation or mitigation that the tribe may recommend to the lead agency.

With some exceptions, any information, including but not limited to, the location, description, and use of tribal cultural resources submitted by a California Native American tribe during the environmental review process shall not be included in the environmental document or otherwise disclosed by the lead agency or any other public agency to the public, consistent with Government Code sections 6254 (r) and 6254.10. Any information submitted by a California Native American tribe during the consultation or environmental review process shall be published in a confidential appendix to the environmental document unless the tribe that provided the information consents, in writing, to the disclosure of some or all of the Information to the public.

If a project may have a significant impact on a tribal cultural resource, the lead agency's environmental document shall discuss both of the following:

- a. Whether the proposed project has a significant impact on an Identified tribal cultural resource.
- b. Whether feasible alternatives or mitigation measures, including those measures that may be agreed to pursuant to Public Resources Code section 21082.3, subdivision (a), avoid or substantially lessen the impact on the identified tribal cultural resource.

Consultation with a tribe shall be considered concluded when either of the following occurs:

- a. The parties agree to measures to mitigate or avoid a significant effect, if a significant effect exists, on a tribal cultural resource; or
- b. A party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached.

Any mitigation measures agreed upon in the consultation conducted pursuant to Public Resources Code section 21080.3.2 shall be recommended for inclusion in the environmental document and in an adopted mitigation monitoring and reporting program, if determined to avoid or lessen the impact pursuant to Public Resources Code section 21082.3, subdivision (b), paragraph 2, and shall be fully enforceable.

If mitigation measures recommended by the staff of the lead agency as a result of the consultation process are not included in the environmental document or if there are no agreed upon mitigation measures at the conclusion of consultation, or if consultation does not occur, and if substantial evidence demonstrates that a project will cause a significant effect to a tribal cultural resource, the lead agency shall consider feasible mitigation pursuant to Public Resources Code section 21084.3(b).

An environmental impact report may not be certified, nor may a mitigated negative declaration or a negative declaration be adopted unless one of the following occurs:

- a. The consultation process between the tribes and the lead agency has occurred as provided in Public Resources Code sections 21080.3.1 and 21080.3.2 and concluded pursuant to Public Resources Code section 21080.3.2.

- b. The tribe that requested consultation failed to provide comments to the lead agency or otherwise failed to engage in the consultation process.
- c. The lead agency provided notice of the project to the tribe in compliance with Public Resources Code section 21080.3 .1 (d) and the tribe failed to request consultation within 30 days.

This process should be documented in the Tribal Cultural Resources section of your environmental document.

Under SB 18:

Government Code § 65352.3 (a) (1) requires consultation with Native Americans on general plan proposals for the purposes of "preserving or mitigating impacts to places, features, and objects described in § 5097.9 and § 5091.993 of the Public Resources Code that are located within the city or county's jurisdiction. Government Code § 65560 (a), (b), and (c) provides for consultation with Native American tribes on the open-space element of a county or city general plan for the purposes of protecting places, features, and objects described in Sections 5097.9 and 5097.993 of the Public Resources Code.

- SB 18 applies to local governments and requires them to contact, provide notice to, refer plans to, and consult with tribes prior to the adoption or amendment of a general plan or a specific plan, or the designation of open space. Local governments should consult the Governor's Office of Planning and Research's "Tribal Consultation Guidelines," which can be found online at: https://www.opr.ca.gov/docs/09_14_05_Updated_Guidelines_922.pdf.
- Tribal Consultation: If a local government considers a proposal to adopt or amend a general plan or a specific plan, or to designate open space it is required to contact the appropriate tribes identified by the NAHC by requesting a "Tribal Consultation List." If a tribe, once contacted, requests consultation the local government must consult with the tribe on the plan proposal. A tribe has 90 days from the date of receipt of notification to request consultation unless a shorter timeframe has been agreed to by the tribe.
- There is no Statutory Time Limit on Tribal Consultation under the law.
- Confidentiality: Consistent with the guidelines developed and adopted by the Office of Planning and Research, the city or county shall protect the confidentiality of the information concerning the specific identity, location, character, and use of places, features and objects described in Public Resources Code sections 5097.9 and 5097.993 that are within the city's or county 's jurisdiction.
- Conclusion Tribal Consultation: Consultation should be concluded at the point in which:
 - The parties to the consultation come to a mutual agreement concerning the appropriate measures for preservation or mitigation; or
 - Either the local government or the tribe, acting in good faith and after reasonable effort concludes that mutual agreement cannot be reached concerning the appropriate measures of preservation or mitigation.

NAHC Recommendations for Cultural Resources Assessments:

- Contact the NAHC for:
 - A Sacred Lands File search. Remember that tribes do not always record their sacred sites in the Sacred Lands File, nor are they required to do so. A Sacred Lands File search is not a

substitute for consultation with tribes that are traditionally and culturally affiliated with the geographic area of the project's APE.

- A Native American Tribal Contact List of appropriate tribes for consultation concerning the project site and to assist in planning for avoidance, preservation in place, or, failing both, mitigation measures.
 - The request form can be found at <http://nahc.ca.gov/resources/forms/>.
- Contact the appropriate regional California Historical Research Information System (CHRIS) Center http://ohp.parks.ca.gov/?page_id=1068) for an archaeological records search. The records search will determine:
 - If part or the entire APE has been previously surveyed for cultural resources.
 - If any known cultural resources have been already been recorded on or adjacent to the APE.
 - If the probability is low, moderate, or high that cultural resources are located in the APE.
 - If a survey is required to determine whether previously unrecorded cultural resources are present.
- If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.
 - The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum and not be made available for public disclosure.
 - The final written report should be submitted within 3 months after work has been completed to the appropriate regional CHRIS center.

Examples of Mitigation Measures That May Be Considered to Avoid or Minimize Significant Adverse Impacts to Tribal Cultural Resources:

- Avoidance and preservation of the resources in place, including, but not limited to:
 - Planning and construction to avoid the resources and protect the cultural and natural context.
 - Planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria.
- Treating the resource with culturally appropriate dignity, taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following:
 - Protecting the cultural character and integrity of the resource.
 - Protecting the traditional use of the resource.
 - Protecting the confidentiality of the resource.
- Permanent conservation easements or other Interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places.
- Please note that a federally recognized California Native American tribe or a non-federally recognized California Native American tribe that is on the contact list maintained by the NAHC to protect a California prehistoric, archaeological, cultural, spiritual, or ceremonial place may

acquire and hold conservation easements if the conservation easement is voluntarily conveyed.

- Please note that it is the policy of the state that Native American remains and associated grave artifacts shall be repatriated.

The lack of surface evidence of archaeological resources (including tribal cultural resources) does not preclude their subsurface existence.

- Lead agencies should include in their mitigation and monitoring reporting program plan provisions for the identification and evaluation of inadvertently discovered archaeological resources. In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American with knowledge of cultural resources should monitor all ground-disturbing activities.
- Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the disposition of recovered cultural items that are not burial associated in consultation with culturally affiliated Native Americans.
- Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the treatment and disposition of inadvertently discovered Native American human remains. Health and Safety Code section 7050.5, Public Resources Code section 5097.98, and Cal. Code Regs., tit. 14, section 15064.5, subdivisions (d) and (e) (CEQA Guidelines section 15064.5, subs. (d) and (e) address the processes to be followed In the event of an Inadvertent discovery of any Native American human remains and associated grave goods in a location other than a dedicated cemetery.

Response No. 1-10

The above comment is an overview of pertinent statutory information provided by the commenter, and is not related to an environmental issue in the Draft MND. No further response is required.

Letter No. 2

Carlyn Lampert – Area Resident
February 10, 2017, email correspondence

Comment No. 2-1

Thank you so much for helping us understand what will be happening at Colfax School and answering our questions.

Response No. 2-1

This comment is not related to an environmental issue in the Draft MND, and no further comment is required. LAUSD appreciates the feedback.

Letter No. 3

Carlyn Lampert – Area Resident
February 10, 2017, email correspondence

Comment No. 3-1

Thank you for being so helpful last night at the school meeting.

I am the woman that lives on Huston Street fairly close to what looks to be the exit driveway for the school.

Response No. 3-1

This comment is introductory in nature and does not pertain to the content of the Draft MND. As such, no further response is required.

Comment No. 3-2

As my neighbor points out, there is a concern that traffic will bog down when cars try to reach the short distance to Colfax to turn right or left. Many people park on Huston to walk to pick up their children. The street becomes clogged without the further addition of the exist [sic].

Response No. 3-2

As discussed in the Draft MND, Section XVII, *Transportation/Traffic*, traffic impacts from the project were evaluated and considered to be less than significant. The surrounding roadways would be able to support the increase in traffic. The proposed drop-off and pick-up lane would be approximately 170 feet in length with an additional 150 feet of queuing area within the proposed Colfax Avenue surface parking lot. Increasing the queuing area within the school site will reduce traffic impacts along Colfax Avenue and improve student safety. In addition, moving the Transportation Building will reduce bus parking near the school, further reducing traffic congestion. The addition of 38 new parking spaces will also ease traffic in the surrounding neighborhood, from parents seeking to park and walk in with their children. Furthermore, the Draft MND includes the implementation of SC-T-4, which encourages construction-related trips to occur during off peak hours.

Comment No. 3-3

I am hoping that another solution can be found. Are they able to put the entrance and exit driveway on Colfax? I have seen that at other schools.

Thank you so much for answering our questions.

Response No. 3-3

As part of the proposed project, the Colfax Avenue Parking Lot will have a driveway egress route on the north side of Huston Street, approximately 120 feet west of Colfax Avenue. Several options for this parking area were evaluated early in the project design, including allowing ingress and egress from Colfax Avenue, allowing ingress and egress from Colfax Avenue and Huston Street as well as various parking and pick up and drop off queueing configurations. These options were eliminated due to distance restrictions to the Colfax Avenue and Huston intersection, potential vehicle and pedestrian conflicts, parking conflicts, as well as impacts to the designated bike lane along Colfax Avenue. In addition, the project as designed would improve pedestrian safety, as students would be dropped off in a designated internal driveway.

Letter No. 4

Lisa Walco
February 12, 2017, email correspondence

Comment No. 4-1

Thank you for taking the time to come to speak at Colfax Charter the other night and field various inquiries concerning the project. I wish to express to you my serious concerns about the plan as it relates to traffic and safety. As I understand it, the proposed drive-thru drop-off would have entry on Colfax and exit onto Huston Street. From both a traffic perspective in terms of the immense back up and congestion this would create onto Huston Street, a small residential street, as well as the monumental safety hazard it would present for the innumerable pedestrians that will be along Huston and Colfax, I believe this to be an extremely poorly planned solution to the problem.

Response No. 4-1

As discussed in the Draft MND, Section XVII, *Transportation/Traffic*, traffic impacts from the project were evaluated and considered to be less than significant. The surrounding roadways would be able to support the increase in traffic. The proposed drop-off and pick-up lane would be approximately 170 feet in length with an additional 150 feet of queuing area within the proposed Colfax Avenue surface parking lot. Increasing the queuing area within the school site will reduce traffic impacts along Colfax Avenue and improve student safety. In addition, moving the Transportation Building will reduce bus parking near the school, further reducing traffic congestion. The addition of 38 new parking spaces will also ease traffic in the surrounding neighborhood, from parents seeking to park and walk in with their children. Furthermore, the Draft MND includes the implementation of SC-T-4, which encourages construction-related trips to occur during off peak hours.

As part of the proposed project, the Colfax Avenue Parking Lot will have a driveway egress route on the north side of Huston Street, approximately 120 feet west of Colfax Avenue. Several options for this parking area were evaluated early in the project design, including parking and ingress and egress configurations, as well as maintaining the parking egress on Colfax Avenue. This option was eliminated due to distance restrictions to the Colfax Avenue and Huston intersection, as well as impacts to the designated bike lane along Colfax Avenue. In addition, the project as designed would improve pedestrian safety, as students would be dropped off in a designated internal driveway.

Comment No. 4-2

In a school of more than 600 students where large numbers of them are driven to school, it is extremely unrealistic to believe that to be either the best, most efficient, or safest means of drop off for our student body. I would highly encourage LAUSD and DOT to reevaluate this plan. Otherwise, I truly believe it is an accident waiting to happen.

Thank you for your time and attention.

Response No. 4-2

As discussed in the Draft MND, Section XVII, *Transportation/Traffic*, traffic impacts from the project were evaluated and considered to be less than significant. The surrounding roadways would be able to support the increase in traffic. The proposed drop-off and pick-up lane would be approximately 170 feet in length with an additional 150 feet of queuing area within the proposed Colfax Avenue surface parking lot. Increasing the

queuing area within the school site will reduce traffic impacts along Colfax Avenue and improve student safety. In addition, moving the Transportation Building will reduce bus parking near the school, further reducing traffic congestion. The addition of 38 new parking spaces will also ease traffic in the surrounding neighborhood, from parents seeking to park and walk in with their children. Furthermore, the Draft MND includes the implementation of SC-T-4, which encourages construction-related trips to occur during off peak hours.

As part of the proposed project, the Colfax Avenue Parking Lot will have a driveway egress route on the north side of Huston Street, approximately 120 feet west of Colfax Avenue. Several options for this parking area were evaluated early in the project design, including maintaining the parking egress on Colfax Avenue. This option was eliminated due to distance restrictions to the Colfax Avenue and Huston intersection, as well as impacts to the designated bike lane along Colfax Avenue. In addition, the project as designed would improve pedestrian safety, as students would be dropped off in a designated internal driveway.

As provided in the Draft MND, Section XIII, *Pedestrian Safety*, to improve student safety, staff and volunteers of the school's Safety Valet program help the school children exit or enter vehicles during the drop-off period at the designated areas on Addison Street, Morella Avenue, and in the Colfax Avenue parking lot. The Safety Valet Program is a collaboration between Colfax Charter Elementary School, the District's Office of Environmental Health & Safety, and the Los Angeles School Police Department to help prevent accidents and keep the students safe.

The Los Angeles Department of Transportation also provides a "Safe Routes to School" map for students of Colfax Charter Elementary School, which details travel routes to the school and identifies the best intersections for students to cross to access the school. These same routes would be utilized by students to access the existing school site and would not be altered as a result of the proposed project. Safe Routes to School maps are available on the District's Office of Environmental Health & Safety's website at: achieve.lausd.net/Page/3990.

As part of the proposed project, LAUSD will coordinate with the City of Los Angeles to install "yellow school crosswalk" pavement markings across Huston Street on the west side of Colfax Avenue at the intersection of Colfax Avenue and Huston Street. Additionally, it was observed that there were 21 elementary school children that cross Huston Street on the west side of Colfax Avenue during the morning hour. One of LADOT's criteria for a crossing guard is a minimum of 20 or more children attending elementary school who cross an intersection. Per LAUSD Reference Guide (REF-1404) for School Traffic Safety, a request for a crossing guard will be submitted to LADOT.

Letter No. 5

Joanna Belson – Parent of Colfax Student
February 14 2017, email correspondence

Comment No. 5-1

I wanted to write you regarding my concerns about the new traffic flow for the proposed new building at Colfax Elementary in Valley Village CA.

Response No. 5-1

This comment is introductory in nature and does not pertain to the content of the Draft MND. As such, no further response is required.

Comment No. 5-2

Colfax Avenue heading south currently gets completely blocked up from Walter Reed To [sic] Colfax Elementary without this new traffic pattern. (This is due to Walter Reeds [sic] drop off on Colfax ave) [sic]

Also, Colfax Ave is extremely dangerous. We have already had a parent and student hit by a car while crossing Colfax Ave. There are not enough traffic signals, crosswalks, AND crossing guards.

Response No. 5-2

As discussed in the Draft MND, Section XVII, *Transportation/Traffic*, traffic impacts from the project were evaluated and considered to be less than significant. The surrounding roadways would be able to support the increase in traffic. The proposed drop-off and pick-up lane would be approximately 170 feet in length with an additional 150 feet of queuing area within the proposed Colfax Avenue surface parking lot. Increasing the queuing area within the school site will reduce traffic impacts along Colfax Avenue and improve student safety. In addition, moving the Transportation Building will reduce bus parking near the school, further reducing traffic congestion. The addition of 38 new parking spaces will also ease traffic in the surrounding neighborhood, from parents seeking to park and walk in with their children. Furthermore, the Draft MND includes the implementation of SC-T-4, which encourages construction-related trips to occur during off peak hours.

As part of the proposed project, the Colfax Avenue Parking Lot will have a driveway egress route on the north side of Huston Street, approximately 120 feet west of Colfax Avenue. Several options for this parking area were evaluated early in the project design, including maintaining the parking egress on Colfax Avenue. This option was eliminated due to distance restrictions to the Colfax Avenue and Huston intersection, as well as impacts to the designated bike lane along Colfax Avenue. In addition, the project as designed would improve pedestrian safety, as students would be dropped off in a designated internal driveway.

As provided in the Draft MND, Section XIII, *Pedestrian Safety*, to improve student safety, staff and volunteers of the school's Safety Valet program help the school children exit or enter vehicles during the drop-off period at the designated areas on Addison Street, Morella Avenue, and in the Colfax Avenue parking lot. The Safety Valet Program is a collaboration between Colfax Charter Elementary School, the District's Office of Environmental Health & Safety, and the Los Angeles School Police Department to help prevent accidents and keep the students safe.

The Los Angeles Department of Transportation also provides a "Safe Routes to School" map for students of Colfax Charter Elementary School, which details travel routes to the school and identifies the best intersections

for students to cross to access the school. These same routes would be utilized by students to access the existing school site and would not be altered as a result of the proposed project. Safe Routes to School maps are available on the District's Office of Environmental Health & Safety's website at: achieve.lausd.net/Page/3990.

As part of the proposed project, LAUSD will coordinate with the City of Los Angeles to install "yellow school crosswalk" pavement markings across Huston Street on the west side of Colfax Avenue at the intersection of Colfax Avenue and Huston Street. Additionally, it was observed that there were 21 elementary school children that cross Huston Street on the west side of Colfax Avenue during the morning hour. One of LADOT's criteria for a crossing guard is a minimum of 20 or more children attending elementary school who cross an intersection. Per LAUSD Reference Guide (REF-1404) for School Traffic Safety, a request for a crossing guard will be submitted to LADOT.

Comment No. 5-3

This new purposed [sic] traffic pattern will be guaranteed to cause a mega backup on Colfax and additional injuries without the proper safety mechanisms put into place. Help us get our kid to school safely and not just within budget. Thank you!

Response No. 5-3

As discussed in the Draft MND, Section XVII, *Transportation/Traffic*, traffic impacts from the project were evaluated and considered to be less than significant. The surrounding roadways would be able to support the increase in traffic. The proposed drop-off and pick-up lane would be approximately 170 feet in length with an additional 150 feet of queuing area within the proposed Colfax Avenue surface parking lot. Increasing the queuing area within the school site will reduce traffic impacts along Colfax Avenue and improve student safety. In addition, moving the Transportation Building will reduce bus parking near the school, further reducing traffic congestion. The addition of 38 new parking spaces will also ease traffic in the surrounding neighborhood, from parents seeking to park and walk in with their children. Furthermore, the Draft MND includes the implementation of SC-T-4, which encourages construction-related trips to occur during off peak hours.

As part of the proposed project, the Colfax Avenue Parking Lot will have a driveway egress route on the north side of Huston Street, approximately 120 feet west of Colfax Avenue. Several options for this parking area were evaluated early in the project design, including maintaining the parking egress on Colfax Avenue. This option was eliminated due to distance restrictions to the Colfax Avenue and Huston intersection, as well as impacts to the designated bike lane along Colfax Avenue. In addition, the project as designed would improve pedestrian safety, as students would be dropped off in a designated internal driveway.

As provided in the Draft MND, Section XIII, *Pedestrian Safety*, to improve student safety, staff and volunteers of the school's Safety Valet program help the school children exit or enter vehicles during the drop-off period at the designated areas on Addison Street, Morella Avenue, and in the Colfax Avenue parking lot. The Safety Valet Program is a collaboration between Colfax Charter Elementary School, the District's Office of Environmental Health & Safety, and the Los Angeles School Police Department to help prevent accidents and keep the students safe.

The Los Angeles Department of Transportation also provides a "Safe Routes to School" map for students of Colfax Charter Elementary School, which details travel routes to the school and identifies the best intersections for students to cross to access the school. These same routes would be utilized by students to access the existing school site and would not be altered as a result of the proposed project. Safe Routes to School maps are available on the District's Office of Environmental Health & Safety's website at: achieve.lausd.net/Page/3990.

As part of the proposed project, LAUSD will coordinate with the City of Los Angeles to install “yellow school crosswalk” pavement markings across Huston Street on the west side of Colfax Avenue at the intersection of Colfax Avenue and Huston Street. Additionally, it was observed that there were 21 elementary school children that cross Huston Street on the west side of Colfax Avenue during the morning hour. One of LADOT’s criteria for a crossing guard is a minimum of 20 or more children attending elementary school who cross an intersection. Per LAUSD Reference Guide (REF-1404) for School Traffic Safety, a request for a crossing guard will be submitted to LADOT.

Letter No. 6

Kira Goldberg – Parent of Colfax Student
February 14 2017, email correspondence

Comment No. 6-1

To whom it may concern:

It was brought to my attention that during and post construction at Colfax Elementary, there will be no additional parking light for the drop off at Colfax and exit on Huston - this is a grave concern to me as a parent, not only for the traffic back up in the neighborhood but also for the safety of the students and pedestrians.

Response No. 6-1

According to DOT methodology, the incremental growth and increase in traffic caused by the proposed project does not warrant a new stop light at the intersection of Colfax Avenue and Huston Street. As discussed in the Draft MND, Section XVII, *Transportation/Traffic*, traffic impacts from the project were evaluated and considered to be less than significant. The surrounding roadways would be able to support the increase in traffic. The proposed drop-off and pick-up lane would be approximately 170 feet in length with an additional 150 feet of queuing area within the proposed Colfax Avenue surface parking lot. Increasing the queuing area within the school site will reduce traffic impacts along Colfax Avenue and improve student safety. In addition, moving the Transportation Building will reduce bus parking near the school, further reducing traffic congestion. The addition of 38 new parking spaces will also ease traffic in the surrounding neighborhood, from parents seeking to park and walk in with their children. Furthermore, the Draft MND includes the implementation of SC-T-4, which encourages construction-related trips to occur during off peak hours.

As part of the proposed project, the Colfax Avenue Parking Lot will have a driveway egress route on the north side of Huston Street, approximately 120 feet west of Colfax Avenue. Several options for this parking area were evaluated early in the project design, including maintaining the parking egress on Colfax Avenue. This option was eliminated due to distance restrictions to the Colfax Avenue and Huston intersection, as well as impacts to the designated bike lane along Colfax Avenue. In addition, the project as designed would improve pedestrian safety, as students would be dropped off in a designated internal driveway.

As provided in the Draft MND, Section XIII, *Pedestrian Safety*, to improve student safety, staff and volunteers of the school's Safety Valet program help the school children exit or enter vehicles during the drop-off period at the designated areas on Addison Street, Morella Avenue, and in the Colfax Avenue parking lot. The Safety Valet Program is a collaboration between Colfax Charter Elementary School, the District's Office of Environmental Health & Safety, and the Los Angeles School Police Department to help prevent accidents and keep the students safe.

The Los Angeles Department of Transportation also provides a "Safe Routes to School" map for students of Colfax Charter Elementary School, which details travel routes to the school and identifies the best intersections for students to cross to access the school. These same routes would be utilized by students to access the existing school site and would not be altered as a result of the proposed project. Safe Routes to School maps are available on the District's Office of Environmental Health & Safety's website at: achieve.lausd.net/Page/3990.

As part of the proposed project, LAUSD will coordinate with the City of Los Angeles to install "yellow school crosswalk" pavement markings across Huston Street on the west side of Colfax Avenue at the intersection of Colfax Avenue and Huston Street. Additionally, it was observed that there were 21 elementary school children that cross Huston Street on the west side of Colfax Avenue during the morning hour. One of LADOT's criteria for a crossing guard is a minimum of 20 or more children attending elementary school who cross an

intersection. Per LAUSD Reference Guide (REF-1404) for School Traffic Safety, a request for a crossing guard will be submitted to LADOT.

Comment No. 6-2

Please reconsider having DOT add a new stop light.
Thanks.

Response No. 6-2

According to DOT methodology, the incremental growth and increase in traffic caused by the proposed project does not warrant a new stop light at the intersection of Colfax Avenue and Huston Street.

Letter No. 7

Lynne Gelman – Parent of Colfax Student
February 14 2017, email correspondence

Comment No. 7-1

I have been a parent at Colfax Charter Elementary since 2010. Now with one child in middle school and one at Colfax, I have to use the valet drop-off, which is currently on Addison, quite frequently. We drop off in the front of the school and then we go to a traffic light. It would be nicer if the line could begin sooner so the line for the traffic light doesn't hold up the valet queue. But at least I do not feel that my children and I are not in danger during drop off. This would not be the case if the drop off is on Colfax.

Response No. 7-1

The valet drop-off on Addison would remain.

As discussed in the Draft MND, Section XVII, *Transportation/Traffic*, traffic impacts from the project were evaluated and considered to be less than significant. The surrounding roadways would be able to support the increase in traffic. The proposed drop-off and pick-up lane would be approximately 170 feet in length with an additional 150 feet of queuing area within the proposed Colfax Avenue surface parking lot. Increasing the queuing area within the school site will reduce traffic impacts along Colfax Avenue and improve student safety. In addition, moving the Transportation Building will reduce bus parking near the school, further reducing traffic congestion. The addition of 38 new parking spaces will also ease traffic in the surrounding neighborhood, from parents seeking to park and walk in with their children. Furthermore, the Draft MND includes the implementation of SC-T-4, which encourages construction-related trips to occur during off peak hours.

As part of the proposed project, the Colfax Avenue Parking Lot will have a driveway egress route on the north side of Huston Street, approximately 120 feet west of Colfax Avenue. Several options for this parking area were evaluated early in the project design, including maintaining the parking egress on Colfax Avenue. This option was eliminated due to distance restrictions to the Colfax Avenue and Huston intersection, as well as impacts to the designated bike lane along Colfax Avenue. In addition, the project as designed would improve pedestrian safety, as students would be dropped off in a designated internal driveway.

As provided in the Draft MND, Section XIII, *Pedestrian Safety*, to improve student safety, staff and volunteers of the school's Safety Valet program help the school children exit or enter vehicles during the drop-off period at the designated areas on Addison Street, Morella Avenue, and in the Colfax Avenue parking lot. The Safety Valet Program is a collaboration between Colfax Charter Elementary School, the District's Office of Environmental Health & Safety, and the Los Angeles School Police Department to help prevent accidents and keep the students safe.

The Los Angeles Department of Transportation also provides a "Safe Routes to School" map for students of Colfax Charter Elementary School, which details travel routes to the school and identifies the best intersections for students to cross to access the school. These same routes would be utilized by students to access the existing school site and would not be altered as a result of the proposed project. Safe Routes to School maps are available on the District's Office of Environmental Health & Safety's website at: achieve.lausd.net/Page/3990.

As part of the proposed project, LAUSD will coordinate with the City of Los Angeles to install "yellow school crosswalk" pavement markings across Huston Street on the west side of Colfax Avenue at the intersection of Colfax Avenue and Huston Street. Additionally, it was observed that there were 21 elementary school children

that cross Huston Street on the west side of Colfax Avenue during the morning hour. One of LADOT's criteria for a crossing guard is a minimum of 20 or more children attending elementary school who cross an intersection. Per LAUSD Reference Guide (REF-1404) for School Traffic Safety, a request for a crossing guard will be submitted to LADOT.

Comment No. 7-2

The proposed drop-off line for Colfax is a recipe for disaster. Even though the main drop-off line is on Addison right now, the traffic backs up on Colfax. The drivers are aggressive and impatient and I've seen people pass in the bike lane numerous times. And the speeding is out of control. I have contacted North Hollywood police and they told me that it was a LAUSD matter. I told our school and we did have a cross guard for a couple of months. This will not do much good when a speeding car decides to pass on the bike lane again.

Response No. 7-2

As part of the proposed project, the Colfax Avenue Parking Lot will have a driveway egress route on the north side of Huston Street, approximately 120 feet west of Colfax Avenue. Several options for this parking area were evaluated early in the project design, including maintaining the parking egress on Colfax Avenue. This option was eliminated due to distance restrictions to the Colfax Avenue and Huston intersection, as well as impacts to the designated bike lane along Colfax Avenue. In addition, the project as designed would improve pedestrian safety, as students would be dropped off in a designated internal driveway.

As provided in the Draft MND, Section XIII, *Pedestrian Safety*, to improve student safety, staff and volunteers of the school's Safety Valet program help the school children exit or enter vehicles during the drop-off period at the designated areas on Addison Street, Morella Avenue, and in the Colfax Avenue parking lot. The Safety Valet Program is a collaboration between Colfax Charter Elementary School, the District's Office of Environmental Health & Safety, and the Los Angeles School Police Department to help prevent accidents and keep the students safe.

The Los Angeles Department of Transportation also provides a "Safe Routes to School" map for students of Colfax Charter Elementary School, which details travel routes to the school and identifies the best intersections for students to cross to access the school. These same routes would be utilized by students to access the existing school site and would not be altered as a result of the proposed project. Safe Routes to School maps are available on the District's Office of Environmental Health & Safety's website at: achieve.lausd.net/Page/3990.

As part of the proposed project, LAUSD will coordinate with the City of Los Angeles to install "yellow school crosswalk" pavement markings across Huston Street on the west side of Colfax Avenue at the intersection of Colfax Avenue and Huston Street. Additionally, it was observed that there were 21 elementary school children that cross Huston Street on the west side of Colfax Avenue during the morning hour. One of LADOT's criteria for a crossing guard is a minimum of 20 or more children attending elementary school who cross an intersection. Per LAUSD Reference Guide (REF-1404) for School Traffic Safety, a request for a crossing guard will be submitted to LADOT.

Comment No. 7-3

I think before you go ahead with this proposal, there needs to be more thought put into the safety of the children. Somebody needs to come out to our school and observe the traffic in real time, multiple times. In addition, we need better signage and warning for drivers to alert them when school is in session.

Response No. 7-3

As provided in the Draft MND, Section XIII, *Pedestrian Safety*, to improve student safety, staff and volunteers of the school's Safety Valet program help the school children exit or enter vehicles during the drop-off period at the designated areas on Addison Street, Morella Avenue, and in the Colfax Avenue parking lot. The Safety Valet Program is a collaboration between Colfax Charter Elementary School, the District's Office of Environmental Health & Safety, and the Los Angeles School Police Department to help prevent accidents and keep the students safe.

The Los Angeles Department of Transportation also provides a "Safe Routes to School" map for students of Colfax Charter Elementary School, which details travel routes to the school and identifies the best intersections for students to cross to access the school. These same routes would be utilized by students to access the existing school site and would not be altered as a result of the proposed project. Safe Routes to School maps are available on the District's Office of Environmental Health & Safety's website at: achieve.lausd.net/Page/3990.

As part of the proposed project, LAUSD will coordinate with the City of Los Angeles to install "yellow school crosswalk" pavement markings across Huston Street on the west side of Colfax Avenue at the intersection of Colfax Avenue and Huston Street. Additionally, it was observed that there were 21 elementary school children that cross Huston Street on the west side of Colfax Avenue during the morning hour. One of LADOT's criteria for a crossing guard is a minimum of 20 or more children attending elementary school who cross an intersection. Per LAUSD Reference Guide (REF-1404) for School Traffic Safety, a request for a crossing guard will be submitted to LADOT.

In regards to better signage for drivers, as stated in the Draft MND under Section XIII, *Pedestrian Safety*, the project would be subject to the School Traffic Safety Reference Guide REF-4492.1, which includes guidance on passenger loading zones and procedures for parking and pedestrian safety (SC-PED-4). The School Traffic Safety Reference Guide REF-4492.1 includes procedures for advance warning signs (school zone), school parking signage, traffic controls, and crossing guards.

Letter No. 8

Lucina Guerrero – Parent of Colfax Student
February 14 2017, email correspondence

Comment No. 8-1

It has recently come to my attention that the upcoming construction to Colfax Charter Elementary that we are all so very excited about will result in a very dangerous drop off pattern for our community! It is my understanding that the construction requires parents dropping off their children to exit onto Huston Street, a residential street, and that there is no plan to add any for [sic] of stop sign or traffic light at this location to keep our children in families safe! (not to mention the obvious traffic back up this will cause on the already crowded Colfax Ave)

Response No. 8-1

A stop sign will be installed at the parking lot egress point for Huston Street.

As part of the proposed project, the Colfax Avenue Parking Lot will have a driveway egress route on the north side of Huston Street, approximately 120 feet west of Colfax Avenue. Several options for this parking area were evaluated early in the project design, including maintaining the parking egress on Colfax Avenue. This option was eliminated due to distance restrictions to the Colfax Avenue and Huston intersection, as well as impacts to the designated bike lane along Colfax Avenue. In addition, the project as designed would improve pedestrian safety, as students would be dropped off in a designated internal driveway.

As provided in the Draft MND, Section XIII, *Pedestrian Safety*, to improve student safety, staff and volunteers of the school's Safety Valet program help the school children exit or enter vehicles during the drop-off period at the designated areas on Addison Street, Morella Avenue, and in the Colfax Avenue parking lot. The Safety Valet Program is a collaboration between Colfax Charter Elementary School, the District's Office of Environmental Health & Safety, and the Los Angeles School Police Department to help prevent accidents and keep the students safe.

The Los Angeles Department of Transportation also provides a "Safe Routes to School" map for students of Colfax Charter Elementary School, which details travel routes to the school and identifies the best intersections for students to cross to access the school. These same routes would be utilized by students to access the existing school site and would not be altered as a result of the proposed project. Safe Routes to School maps are available on the District's Office of Environmental Health & Safety's website at: achieve.lausd.net/Page/3990.

As part of the proposed project, LAUSD will coordinate with the City of Los Angeles to install "yellow school crosswalk" pavement markings across Huston Street on the west side of Colfax Avenue at the intersection of Colfax Avenue and Huston Street. Additionally, it was observed that there were 21 elementary school children that cross Huston Street on the west side of Colfax Avenue during the morning hour. One of LADOT's criteria for a crossing guard is a minimum of 20 or more children attending elementary school who cross an intersection. Per LAUSD Reference Guide (REF-1404) for School Traffic Safety, a request for a crossing guard will be submitted to LADOT.

According to DOT methodology, the incremental growth and increase in traffic caused by the proposed project does not warrant a new stop light at the intersection of Colfax Avenue and Huston Street.

Comment No. 8-2

I am writing to urge you to take a stand to protect our families, and especially our children!!! In light of the tragic loss of life last year by a student from Oakwood School just around the corner due to a careless driver, I would imagine LAUSD would want to do everything in their power to protect it's [sic] students by working with the DOT to create a solution!

Thank you in advance for taking action to keep our children and community safe.

Response No. 8-2

Consultation with LADOT was undertaken by LAUSD's traffic engineers. A Memorandum of Understanding (MOU) was submitted, which included the project site plan, study intersection locations, project trip generation, and trip distribution. LADOT reviewed and approved the MOU, and it was signed by LADOT in June 2016.

Letter No. 9

Andrea Sirota – Parent of Colfax Student
February 14 2017, email correspondence

Comment No. 9-1

I reviewed the CEQA report for the proposed construction at our school, Colfax Charter Elementary School in Valley Village, and attended the meeting with LAUSD. Of MAJOR concern was where the intended drive-thru student drop-off line will be when construction is completed. The plan is to have drop off run in a segregated line through the new parking lot on Colfax Avenue. It will involve entry on Colfax and exiting onto Huston Street, a small, residential street. There will be no addition of a traffic light or a stop light or anything. Just simply having cars pull out onto Huston.

Response No. 9-1

As discussed in the Draft MND, Section XVII, *Transportation/Traffic*, traffic impacts from the project were evaluated and considered to be less than significant. The surrounding roadways would be able to support the increase in traffic. The proposed drop-off and pick-up lane would be approximately 170 feet in length with an additional 150 feet of queuing area within the proposed Colfax Avenue surface parking lot. Increasing the queuing area within the school site will reduce traffic impacts along Colfax Avenue and improve student safety. In addition, moving the Transportation Building will reduce bus parking near the school, further reducing traffic congestion. The addition of 38 new parking spaces will also ease traffic in the surrounding neighborhood, from parents seeking to park and walk in with their children. Furthermore, the Draft MND includes the implementation of SC-T-4, which encourages construction-related trips to occur during off peak hours.

As part of the proposed project, the Colfax Avenue Parking Lot will have a driveway egress route on the north side of Huston Street, approximately 120 feet west of Colfax Avenue. Several options for this parking area were evaluated early in the project design, including maintaining the parking egress on Colfax Avenue. This option was eliminated due to distance restrictions to the Colfax Avenue and Huston intersection, as well as impacts to the designated bike lane along Colfax Avenue. In addition, the project as designed would improve pedestrian safety, as students would be dropped off in a designated internal driveway.

As provided in the Draft MND, Section XIII, *Pedestrian Safety*, to improve student safety, staff and volunteers of the school's Safety Valet program help the school children exit or enter vehicles during the drop-off period at the designated areas on Addison Street, Morella Avenue, and in the Colfax Avenue parking lot. The Safety Valet Program is a collaboration between Colfax Charter Elementary School, the District's Office of Environmental Health & Safety, and the Los Angeles School Police Department to help prevent accidents and keep the students safe.

The Los Angeles Department of Transportation also provides a "Safe Routes to School" map for students of Colfax Charter Elementary School, which details travel routes to the school and identifies the best intersections for students to cross to access the school. These same routes would be utilized by students to access the existing school site and would not be altered as a result of the proposed project. Safe Routes to School maps are available on the District's Office of Environmental Health & Safety's website at: achieve.lausd.net/Page/3990.

As part of the proposed project, LAUSD will coordinate with the City of Los Angeles to install "yellow school crosswalk" pavement markings across Huston Street on the west side of Colfax Avenue at the intersection of Colfax Avenue and Huston Street. Additionally, it was observed that there were 21 elementary school children that cross Huston Street on the west side of Colfax Avenue during the morning hour. One of LADOT's criteria

for a crossing guard is a minimum of 20 or more children attending elementary school who cross an intersection. Per LAUSD Reference Guide (REF-1404) for School Traffic Safety, a request for a crossing guard will be submitted to LADOT.

According to DOT methodology, the incremental growth and increase in traffic caused by the proposed project does not warrant a new stop light at the intersection of Colfax Avenue and Huston Street.

Comment No. 9-2

You can imagine the potential safety hazards, not to mention extreme traffic back up of cars waiting to pull out of the lot and onto Huston, further exacerbating the back up of cars attempting to enter the lot for drop off...

Response No. 9-2

As discussed in the Draft MND, Section XVII, *Transportation/Traffic*, traffic impacts from the project were evaluated and considered to be less than significant. The surrounding roadways would be able to support the increase in traffic. The proposed drop-off and pick-up lane would be approximately 170 feet in length with an additional 150 feet of queuing area within the proposed Colfax Avenue surface parking lot. Increasing the queuing area within the school site will reduce traffic impacts along Colfax Avenue and improve student safety. In addition, moving the Transportation Building will reduce bus parking near the school, further reducing traffic congestion. The addition of 38 new parking spaces will also ease traffic in the surrounding neighborhood, from parents seeking to park and walk in with their children. Furthermore, the Draft MND includes the implementation of SC-T-4, which encourages construction-related trips to occur during off peak hours.

As part of the proposed project, the Colfax Avenue Parking Lot will have a driveway egress route on the north side of Huston Street, approximately 120 feet west of Colfax Avenue. Several options for this parking area were evaluated early in the project design, including maintaining the parking egress on Colfax Avenue. This option was eliminated due to distance restrictions to the Colfax Avenue and Huston intersection, as well as impacts to the designated bike lane along Colfax Avenue. In addition, the project as designed would improve pedestrian safety, as students would be dropped off in a designated internal driveway.

As provided in the Draft MND, Section XIII, *Pedestrian Safety*, to improve student safety, staff and volunteers of the school's Safety Valet program help the school children exit or enter vehicles during the drop-off period at the designated areas on Addison Street, Morella Avenue, and in the Colfax Avenue parking lot. The Safety Valet Program is a collaboration between Colfax Charter Elementary School, the District's Office of Environmental Health & Safety, and the Los Angeles School Police Department to help prevent accidents and keep the students safe.

The Los Angeles Department of Transportation also provides a "Safe Routes to School" map for students of Colfax Charter Elementary School, which details travel routes to the school and identifies the best intersections for students to cross to access the school. These same routes would be utilized by students to access the existing school site and would not be altered as a result of the proposed project. Safe Routes to School maps are available on the District's Office of Environmental Health & Safety's website at: achieve.lausd.net/Page/3990.

As part of the proposed project, LAUSD will coordinate with the City of Los Angeles to install "yellow school crosswalk" pavement markings across Huston Street on the west side of Colfax Avenue at the intersection of Colfax Avenue and Huston Street. Additionally, it was observed that there were 21 elementary school children that cross Huston Street on the west side of Colfax Avenue during the morning hour. One of LADOT's criteria for a crossing guard is a minimum of 20 or more children attending elementary school who cross an

intersection. Per LAUSD Reference Guide (REF-1404) for School Traffic Safety, a request for a crossing guard will be submitted to LADOT.

According to DOT methodology, the incremental growth and increase in traffic caused by the proposed project does not warrant a new stop light at the intersection of Colfax Avenue and Huston Street.

Comment No. 9-3

It was made clear at the meeting that this is the time for comments and that the window to do so will be closing pretty soon.

Response No. 9-3

The public comment period ended on March 3, 2017.

Comment No. 9-4

Please consider a stop light or sign. Many of us walk our children home from school. We want everyone to be safe.

Response No. 9-4

As provided in the Draft MND, Section XIII, *Pedestrian Safety*, to improve student safety, staff and volunteers of the school's Safety Valet program help the school children exit or enter vehicles during the drop-off period at the designated areas on Addison Street, Morella Avenue, and in the Colfax Avenue parking lot. The Safety Valet Program is a collaboration between Colfax Charter Elementary School, the District's Office of Environmental Health & Safety, and the Los Angeles School Police Department to help prevent accidents and keep the students safe.

The Los Angeles Department of Transportation also provides a "Safe Routes to School" map for students of Colfax Charter Elementary School, which details travel routes to the school and identifies the best intersections for students to cross to access the school. These same routes would be utilized by students to access the existing school site and would not be altered as a result of the proposed project. Safe Routes to School maps are available on the District's Office of Environmental Health & Safety's website at: achieve.lausd.net/Page/3990.

As part of the proposed project, LAUSD will coordinate with the City of Los Angeles to install "yellow school crosswalk" pavement markings across Huston Street on the west side of Colfax Avenue at the intersection of Colfax Avenue and Huston Street. Additionally, it was observed that there were 21 elementary school children that cross Huston Street on the west side of Colfax Avenue during the morning hour. One of LADOT's criteria for a crossing guard is a minimum of 20 or more children attending elementary school who cross an intersection. Per LAUSD Reference Guide (REF-1404) for School Traffic Safety, a request for a crossing guard will be submitted to LADOT.

According to DOT methodology, the incremental growth and increase in traffic caused by the proposed project does not warrant a new stop light at the intersection of Colfax Avenue and Huston Street.

Letter No. 10

Dianna Watson, California Department of Transportation
February 21 2017, email correspondence

Comment No. 10-1

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project. The proposed project includes the construction of 18 new classrooms, removal of 10 portable classrooms, internal modification of administrative spaces, and expanded lunch shelter and arcade, relocation of the school's main entry, and construction of a new surface parking lot.

Response No. 10-1

This comment is introductory in nature and does not pertain to the content of the Draft MND. The comment also provides an accurate overview of the proposed project. As such, no further response is required.

Comment No. 10-2

In Appendix G, Traffic Study, prepared RAJU Associates dated October 2016, indicated that the project will generate a net total of 206 daily trips of which 94 trips would occur during the morning peak hour. In addition, there are 24 unrelated project [*sic*] identified within the study area and expected to generate 1,924 trips during the morning peak hours.

The nearest facilities to the proposed project is [*sic*] US-101 and SR-170. Although, Caltrans does not expect project approval to result in a direct adverse impact to the existing State transportation facilities, the incremental effect of the project, combined with the effects of the other past, present and reasonably foreseeable future projects within the vicinity of this project, cumulative impact may occur. As a reminder, the decision makers should be aware of this issue and be prepared to mitigate cumulative traffic impact in the future.

Response No. 10-2

This comment provides an overview of traffic generated by the project in the surrounding vicinity, and also describes nearby transportation facilities. This comment does not pertain to the content of the Draft MND. As such, no further response is required.

Comment No. 10-3

Caltrans acknowledges that in Attachment B of the Draft Initial study dated February 2017, Page B-72, "the City of Los Angeles Department of Transportation has provided the District with a Safe Routes to School map for the students... which details travel routes to the school and identifies the best intersections for students to cross access the school...", and Page B-84, "...encourages ride-sharing programs for students and teachers, as well as riding bicycles to school."

Response No. 10-3

This comment provides an overview of LAUSD's Safe Route's to School map and ride-sharing programs, as indicated in the Draft MND. As such, no further response is required.

Comment No. 10-4

In view of SB 743, the Governor's Office of Planning and Research (OPR) is working to develop an alternative to LOS for evaluating transportation impacts pursuant to CEQA. [sic] Such as using Vehicle Miles Traveled (VMT) as the primary metric in identifying transportation impacts for all future development projects. Once OPR provides new guidance, Caltrans hopes to collaborate with the City to adopt methods of traffic analysis and new thresholds that are mutually acceptable.

Response No. 10-4

This comment provides a description of forthcoming OPR guidance on the evaluation standards for transportation impacts and the adoption of new thresholds in the future. This comment does not pertain to the content of the Draft MND. As such, no further response is required.

Comment No. 10-5

Caltrans continues to strive to improve its standards and processes to provide flexibility while maintaining the safety and integrity of the State's transportation system. It is our goal to implement strategies that are in keeping with our mission statement, which is to *"provide a safe, sustainable, integrated, and efficient transportation system to enhance California's economy and livability."*

Response No. 10-5

This comment provides a restatement of Caltrans' goals and mission statement, and does not pertain to the content of the Draft MND. As such, no further response is required.

Comment No. 10-6

As a reminder, transportation of heavy construction equipment and/or materials, which requires the use of oversized-transport vehicles on State highways, will require a Caltrans transportation permit. Caltrans recommends that large size truck trips be limited to off-peak commute periods.

Response No. 10-6

LAUSD will comply with all applicable Caltrans requirements and permits.

Comment No. 10-7

Storm water run-off is a sensitive issue for Los Angeles and Ventura counties. Please be mindful that project [sic] needs to be designed to discharge clean run-off water and it is not permitted to discharge onto State highway facilities.

Response No. 10-7

As stated in the Draft MND Section IX, *Hydrology and Water Quality*, LAUSD would implement SC-HWQ-1, which requires compliance with LAUSD's Stormwater Technical Manual and the District's General Construction Activity Permit. LAUSD standards also include a requirement to prepare and implement a sediment and erosion control plan that follows the Best Management Practices outlined in the State Water Resources Control Board to comply with a Construction General Permit, including the development of a Storm Water Pollution Prevention Plan, as required by the Regional Water Quality Control Board's National Pollutant Discharge Elimination System. The proposed project will not discharge stormwater onto state highway facilities.

Comment No. 10-8

If you have any questions or concerns regarding these comments, please contact project coordinator, Frances Lee at (213) 897-0673 or electronically at frances.lee@dot.ca.gov.

Response No. 10-8

This comment is a conclusion to the Caltrans letter and does not pertain to the content of the Draft MND. As such, no further response is required.

Letter No. 11

David Shluker – Area Resident
February 24 2017, email correspondence

Comment No. 11-1

I live on Addison street [sic] directly across from Colfax Charter Elementary School. I am strongly opposed to any large scale construction at the school. I have Duchenne Muscular Dystrophy, in a wheelchair, I'm on a Ventilator that breaths for me, and I have 24/7 Nursing Care. The dust and noise of construction will be very dangerous to my health.

Response No. 11-1

As described in the Draft MND, Section III., *Air Quality*, the proposed project will include limited grading and construction activities and, therefore, may result in fugitive dust emissions. Due to the relatively short construction duration and low demand for heavy duty diesel construction equipment (e.g., limited earthmoving activities) needed to complete the proposed project, toxic air contaminants (TAC) emissions from construction activities would not result in long-term health risks to existing off-site sensitive populations. Though construction emissions for this project are short-term and not expected to exceed regional thresholds, the District will implement Mitigation Measures to ensure that construction emissions would have minimal off-site impacts. SC-AQ-2 requires construction equipment to be maintained, so as to ensure that excessive emissions are not generated by unmaintained equipment and that sensitive receptors would have minimal exposure to construction emissions. SC-AQ-4 requires site-specific air quality assessments to identify potentially adverse impacts, and also mandates implementation of a number of specific measures to reduce air quality emissions. SC-AQ-5 would further decrease project-related operational impacts by encouraging ride-sharing programs for students and teachers, maintain fleet and service vehicles in order to prevent significant increases in air pollutant emissions created by operation of a new school.

As further described in the Draft MND, Section XII., *Noise*, the project would result in a temporary increase in ambient noise near the project site from the use of stationary and mobile construction equipment during the construction period. Project-related construction noise would be localized and would occur intermittently for varying periods of time. Noise generated by on-site construction activities would have a less than significant impact on surrounding uses with incorporation of the prescribed Mitigation Measures, related to exceeding noise standards. Compliance with the applicable noise ordinances and incorporation of LAUSD SC-N-5 requires the construction contractor to consult and coordinate with the school principal and nearby sensitive land uses prior to construction and high noise producing activities in order to minimize disruptions. Implementation of SC-N-5 would ensure that there would not be a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project, and impacts would be less than significant.

Letter No. 12

Jerry Baruck – Area Resident
March 2, 2017, email correspondence

Comment No. 12-1

I am very concerned about the adoption of the initial study/mitigated negative declaration. The proposed exit from the parking lot/drop off area on the south east corner (Huston) would create an extensive amount of traffic through the residential area and be extremely dangerous due to the close proximity to vehicles turning west from Colfax. It is highly likely that exiting the parking lot/drop off area would be backed up and the entrance to the drop off area from Colfax would then be extensively backed up to the north on Colfax causing a dangerous traffic condition.

Response No. 12-1

As discussed in the Draft MND, Section XVII, *Transportation/Traffic*, traffic impacts from the project were evaluated and considered to be less than significant. The surrounding roadways would be able to support the increase in traffic. The proposed drop-off and pick-up lane would be approximately 170 feet in length with an additional 150 feet of queuing area within the proposed Colfax Avenue surface parking lot. Increasing the queuing area within the school site will reduce traffic impacts along Colfax Avenue and improve student safety. In addition, moving the Transportation Building will reduce bus parking near the school, further reducing traffic congestion. The addition of 38 new parking spaces will also ease traffic in the surrounding neighborhood, from parents seeking to park and walk in with their children. Furthermore, the Draft MND includes the implementation of SC-T-4, which encourages construction-related trips to occur during off peak hours.

As part of the proposed project, the Colfax Avenue Parking Lot will have a driveway egress route on the north side of Huston Street, approximately 120 feet west of Colfax Avenue. Several options for this parking area were evaluated early in the project design, including maintaining the parking egress on Colfax Avenue. This option was eliminated due to distance restrictions to the Colfax Avenue and Huston intersection, as well as impacts to the designated bike lane along Colfax Avenue. In addition, the project as designed would improve pedestrian safety, as students would be dropped off in a designated internal driveway.

Comment No. 12-2

It is my understanding that a dedicated lane is being provided for the vehicles to make a right turn into the parking lot/drop off area when traveling south on Colfax. The same lane should be accessible when exiting the parking lot/drop off area allowing vehicles to exit at the south east corner directly onto Colfax in the continuation of the dedicated lane.

Response No. 12-2

As discussed in the Draft MND, Section XVII, *Transportation/Traffic*, traffic impacts from the project were evaluated and considered to be less than significant. The surrounding roadways would be able to support the increase in traffic. The proposed drop-off and pick-up lane would be approximately 170 feet in length with an additional 150 feet of queuing area within the proposed Colfax Avenue surface parking lot. Increasing the queuing area within the school site will reduce traffic impacts along Colfax Avenue and improve student safety. In addition, moving the Transportation Building will reduce bus parking near the school, further reducing traffic congestion. The addition of 38 new parking spaces will also ease traffic in the surrounding neighborhood, from parents seeking to park and walk in with their children. Furthermore, the Draft MND

includes the implementation of SC-T-4, which encourages construction-related trips to occur during off peak hours.

As part of the proposed project, the Colfax Avenue Parking Lot will have a driveway egress route on the north side of Huston Street, approximately 120 feet west of Colfax Avenue. Several options for this parking area were evaluated early in the project design, including maintaining the parking egress on Colfax Avenue. This option was eliminated due to distance restrictions to the Colfax Avenue and Huston intersection, as well as impacts to the designated bike lane along Colfax Avenue. In addition, the project as designed would improve pedestrian safety, as students would be dropped off in a designated internal driveway.

Letter No. 13

Karen Kaysing – Area Resident
March 2, 2017, email correspondence

Comment No. 13-1

I am a homeowner across the street from Colfax Charter Elementary School (CCES). I have attended the meetings presented for the benefit of the community in connection with the proposed expansion of the school and have the following comments and concerns regarding the adoption of the Initial Study/Mitigated Negative Declaration (MND):

Response No. 13-1

This comment is introductory in nature and does not pertain to the content of the Draft MND. As such, no further response is required.

Comment No. 13-2

1. The project estimates that approximately 40 mature trees will have to be removed. While it has been promised that they will be replaced by “new, large trees,” the environmental impact sustained by removal of mature trees merits further review. As many existing trees as possible must be preserved and maintained for their continued ecological benefit.

Response No. 13-2

As described in the Draft MND, Section IV., *Biological Resources*, a total of 40 landscape trees will be removed as part of the project, 14 of which are being removed for student safety reasons. LAUSD is preserving and maintaining as many of the existing trees as possible. LAUSD’s tree replacement and landscaping program, which includes planting 34 new trees and extensive landscaping, will mitigate the loss of the landscape trees.

Comment No. 13-3

2. The new parking/drop off configuration proposes to have vehicles exit onto Huston Street on the south side of the school. It seems that the proximity to Colfax Avenue, a busy street, will create a congestion issue, backing up traffic through the drop off area (and, perhaps, back up southbound Colfax to the north of the school), and/or create more traffic through the residential area to the west.

Response No. 13-3

As discussed in the Draft MND, Section XVII, *Transportation/Traffic*, traffic impacts from the project were evaluated and considered to be less than significant. The surrounding roadways would be able to support the increase in traffic. The proposed drop-off and pick-up lane would be approximately 170 feet in length with an additional 150 feet of queuing area within the proposed Colfax Avenue surface parking lot. Increasing the queuing area within the school site will reduce traffic impacts along Colfax Avenue and improve student safety. In addition, moving the Transportation Building will reduce bus parking near the school, further reducing traffic congestion. The addition of 38 new parking spaces will also ease traffic in the surrounding neighborhood, from parents seeking to park and walk in with their children. Furthermore, the Draft MND includes the implementation of SC-T-4, which encourages construction-related trips to occur during off peak hours.

As part of the proposed project, the Colfax Avenue Parking Lot will have a driveway egress route on the north side of Huston Street, approximately 120 feet west of Colfax Avenue. Several options for this parking area were evaluated early in the project design, including maintaining the parking egress on Colfax Avenue. This option was eliminated due to distance restrictions to the Colfax Avenue and Huston intersection, as well as impacts to the designated bike lane along Colfax Avenue. In addition, the project as designed would improve pedestrian safety, as students would be dropped off in a designated internal driveway.

Comment No. 13-4

Additionally, the back-up of cars trying to exit the drop-off area will increase the pollution and particulates into the neighborhood.

Response No. 13-4

As described in the Draft MND, Section III., *Air Quality*, the proposed project will include limited grading and construction activities and, therefore, may result in fugitive dust emissions. Due to the relatively short construction duration and low demand for heavy duty diesel construction equipment (e.g., limited earthmoving activities) needed to complete the proposed project, toxic air contaminants (TAC) emissions from construction activities would not result in long-term health risks to existing off-site sensitive populations. Though construction emissions for this project are short-term and not expected to exceed regional thresholds, the District will implement Mitigation Measures to ensure that construction emissions would have minimal off-site impacts. SC-AQ-2 requires construction equipment to be maintained, so as to ensure that excessive emissions are not generated by unmaintained equipment and that sensitive receptors would have minimal exposure to construction emissions. SC-AQ-4 requires site-specific air quality assessments to identify potentially adverse impacts, and also mandates implementation of a number of specific measures to reduce air quality emissions. SC-AQ-5 would further decrease project-related operational impacts by encouraging ride-sharing programs for students and teachers, maintain fleet and service vehicles in order to prevent significant increases in air pollutant emissions created by operation of a new school.

As further described in the Draft MND, Section XII., *Noise*, the project would result in a temporary increase in ambient noise near the project site from the use of stationary and mobile construction equipment during the construction period. Project-related construction noise would be localized and would occur intermittently for varying periods of time. Noise generated by on-site construction activities would have a less than significant impact on surrounding uses with incorporation of the prescribed Mitigation Measures, related to exceeding noise standards. Compliance with the applicable noise ordinances and incorporation of LAUSD SC-N-5 requires the construction contractor to consult and coordinate with the school principal and nearby sensitive land uses prior to construction and high noise producing activities in order to minimize disruptions. Implementation of SC-N-5 would ensure that there would not be a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project, and impacts would be less than significant.

Comment No. 13-5

The new parking/drop off configuration should be reviewed for a more efficient design.

Response No. 13-5

As discussed in the Draft MND, Section XVII., *Transportation/Traffic*, traffic impacts from the project were evaluated and considered to be less than significant. The surrounding roadways would be able to support the increase in traffic. The proposed drop-off and pick-up lane would be approximately 170 feet in length with an additional 150 feet of queuing area within the proposed Colfax Avenue surface parking lot. Increasing the

queuing area within the school site will reduce traffic impacts along Colfax Avenue and improve student safety. In addition, moving the Transportation Building will reduce bus parking near the school, further reducing traffic congestion. The addition of 38 new parking spaces will also ease traffic in the surrounding neighborhood, from parents seeking to park and walk in with their children. Furthermore, the Draft MND includes the implementation of SC-T-4, which encourages construction-related trips to occur during off peak hours.

As part of the proposed project, the Colfax Avenue Parking Lot will have a driveway egress route on the north side of Huston Street, approximately 120 feet west of Colfax Avenue. Several options for this parking area were evaluated early in the project design, including maintaining the parking egress on Colfax Avenue. This option was eliminated due to distance restrictions to the Colfax Avenue and Huston intersection, as well as impacts to the designated bike lane along Colfax Avenue. In addition, the project as designed would improve pedestrian safety, as students would be dropped off in a designated internal driveway.

As provided in the Draft MND, Section XIII, *Pedestrian Safety*, to improve student safety, staff and volunteers of the school's Safety Valet program help the school children exit or enter vehicles during the drop-off period at the designated areas on Addison Street, Morella Avenue, and in the Colfax Avenue parking lot. The Safety Valet Program is a collaboration between Colfax Charter Elementary School, the District's Office of Environmental Health & Safety, and the Los Angeles School Police Department to help prevent accidents and keep the students safe.

The Los Angeles Department of Transportation also provides a "Safe Routes to School" map for students of Colfax Charter Elementary School, which details travel routes to the school and identifies the best intersections for students to cross to access the school. These same routes would be utilized by students to access the existing school site and would not be altered as a result of the proposed project. Safe Routes to School maps are available on the District's Office of Environmental Health & Safety's website at: achieve.lausd.net/Page/3990.

As part of the proposed project, LAUSD will coordinate with the City of Los Angeles to install "yellow school crosswalk" pavement markings across Huston Street on the west side of Colfax Avenue at the intersection of Colfax Avenue and Huston Street. Additionally, it was observed that there were 21 elementary school children that cross Huston Street on the west side of Colfax Avenue during the morning hour. One of LADOT's criteria for a crossing guard is a minimum of 20 or more children attending elementary school who cross an intersection. Per LAUSD Reference Guide (REF-1404) for School Traffic Safety, a request for a crossing guard will be submitted to LADOT.

Comment No. 13-6

3. It has been our experience that the maintenance of the landscaping of CCES leaves quite a bit to be desired. (Perhaps this historic neglect has caused the "need" for removal of so many trees...) We would like the proposed expansion of CCES to include provisions for adequate, ongoing care for the grounds (hardscape AND plants) and that the project be designed and funded accordingly.

Response No. 13-6

As described in Draft MND Attachment A, *Project Description*, the project's landscaping plan includes a new "Smart Weather" controller, which would be installed to replace the inefficient irrigation system currently covering approximately 20 percent of the school. The new irrigation system would be adjustable to minimize overspray on buildings and paving. All trees would be irrigated using a root watering bubbler system to encourage deep root growth, and all planting areas would use efficient pop-up sprayers.

Letter No. 14

Dan Caplan
March 5, 2017, email correspondence

Comment No. 14-1

Regarding the proposed traffic flow for entry and exit to and from the new parking lot and drop off/pick up route that puts outgoing traffic onto Huston Street, I would like to draw your attention to the existing poor visibility and substandard sidewalk on the south corner of Huston Street, where outgoing traffic will attempt to rejoin the flow on Colfax Avenue.

Response No. 14-1

As described in the Draft MND, Section XIII., *Pedestrian Safety*, the proposed project as designed would improve pedestrian safety in the area. As part of the project design features, appropriate sight distance provisions would be made at the parking lot access driveways along Colfax Avenue and Huston Street.

Comment No. 14-2

Below are some pictures taken at the time of morning drop off, looking east from Huston, and south onto Colfax. As you will see, there is a large hedge encroaching on the street, with no sidewalk on the south side of Huston, and a narrow asphalt walkway around the corner.

Response No. 14-2

This comment does not pertain to the content of the Draft MND, as it provides a description of existing conditions. As such, no further response is required.

Comment No. 14-3

Whereas these conditions are not in the scope of the renovation, the proposed traffic flow will interface with this situation. Cars that currently rejoin traffic from the lot on Colfax will increase the number of cars making this turn, which is potentially hazardous to pedestrians approaching the school from around the hedge. And take note that there is **no** sidewalk on the east side of Colfax Avenue. I also fear that these conditions will push traffic into the neighborhood onto other side streets, seeking a better route to a main street.

Response No. 14-3

As discussed in the Draft MND, Section XVII, *Transportation/Traffic*, traffic impacts from the project were evaluated and considered to be less than significant. The surrounding roadways would be able to support the increase in traffic. The proposed drop-off and pick-up lane would be approximately 170 feet in length with an additional 150 feet of queuing area within the proposed Colfax Avenue surface parking lot. Increasing the queuing area within the school site will reduce traffic impacts along Colfax Avenue and improve student safety. In addition, moving the Transportation Building will reduce bus parking near the school, further reducing traffic congestion. The addition of 38 new parking spaces will also ease traffic in the surrounding neighborhood, from parents seeking to park and walk in with their children. Furthermore, the Draft MND includes the implementation of SC-T-4, which encourages construction-related trips to occur during off peak hours.

As part of the proposed project, the Colfax Avenue Parking Lot will have a driveway egress route on the north side of Huston Street, approximately 120 feet west of Colfax Avenue. Several options for this parking area

were evaluated early in the project design, including maintaining the parking egress on Colfax Avenue. This option was eliminated due to distance restrictions to the Colfax Avenue and Huston intersection, as well as impacts to the designated bike lane along Colfax Avenue. In addition, the project as designed would improve pedestrian safety, as students would be dropped off in a designated internal driveway.

As provided in the Draft MND, Section XIII, *Pedestrian Safety*, to improve student safety, staff and volunteers of the school's Safety Valet program help the school children exit or enter vehicles during the drop-off period at the designated areas on Addison Street, Morella Avenue, and in the Colfax Avenue parking lot. The Safety Valet Program is a collaboration between Colfax Charter Elementary School, the District's Office of Environmental Health & Safety, and the Los Angeles School Police Department to help prevent accidents and keep the students safe.

The Los Angeles Department of Transportation also provides a "Safe Routes to School" map for students of Colfax Charter Elementary School, which details travel routes to the school and identifies the best intersections for students to cross to access the school. These same routes would be utilized by students to access the existing school site and would not be altered as a result of the proposed project. Safe Routes to School maps are available on the District's Office of Environmental Health & Safety's website at: achieve.lausd.net/Page/3990.

As part of the proposed project, LAUSD will coordinate with the City of Los Angeles to install "yellow school crosswalk" pavement markings across Huston Street on the west side of Colfax Avenue at the intersection of Colfax Avenue and Huston Street. Additionally, it was observed that there were 21 elementary school children that cross Huston Street on the west side of Colfax Avenue during the morning hour. One of LADOT's criteria for a crossing guard is a minimum of 20 or more children attending elementary school who cross an intersection. Per LAUSD Reference Guide (REF-1404) for School Traffic Safety, a request for a crossing guard will be submitted to LADOT.

As described in the Draft MND, Section XIII., *Pedestrian Safety*, the proposed project as designed would improve pedestrian safety in the area. As part of the project design features, appropriate sight distance provisions would be made at the parking lot access driveways along Colfax Avenue and Huston Street.

Comment No. 14-4

I suggest that if LAUSD must redirect the traffic flow to Huston, that it work with the City to improve visibility and conditions on this corner.

Response No. 14-4

As discussed in the Draft MND, Section XVII, *Transportation/Traffic*, traffic impacts from the project were evaluated and considered to be less than significant. The surrounding roadways would be able to support the increase in traffic. The proposed drop-off and pick-up lane would be approximately 170 feet in length with an additional 150 feet of queuing area within the proposed Colfax Avenue surface parking lot. Increasing the queuing area within the school site will reduce traffic impacts along Colfax Avenue and improve student safety. In addition, moving the Transportation Building will reduce bus parking near the school, further reducing traffic congestion. The addition of 38 new parking spaces will also ease traffic in the surrounding neighborhood, from parents seeking to park and walk in with their children. Furthermore, the Draft MND includes the implementation of SC-T-4, which encourages construction-related trips to occur during off peak hours.

As part of the proposed project, the Colfax Avenue Parking Lot will have a driveway egress route on the north side of Huston Street, approximately 120 feet west of Colfax Avenue. Several options for this parking area were evaluated early in the project design, including maintaining the parking egress on Colfax Avenue. This

option was eliminated due to distance restrictions to the Colfax Avenue and Huston intersection, as well as impacts to the designated bike lane along Colfax Avenue. In addition, the project as designed would improve pedestrian safety, as students would be dropped off in a designated internal driveway.

As provided in the Draft MND, Section XIII, *Pedestrian Safety*, to improve student safety, staff and volunteers of the school's Safety Valet program help the school children exit or enter vehicles during the drop-off period at the designated areas on Addison Street, Morella Avenue, and in the Colfax Avenue parking lot. The Safety Valet Program is a collaboration between Colfax Charter Elementary School, the District's Office of Environmental Health & Safety, and the Los Angeles School Police Department to help prevent accidents and keep the students safe.

The Los Angeles Department of Transportation also provides a "Safe Routes to School" map for students of Colfax Charter Elementary School, which details travel routes to the school and identifies the best intersections for students to cross to access the school. These same routes would be utilized by students to access the existing school site and would not be altered as a result of the proposed project. Safe Routes to School maps are available on the District's Office of Environmental Health & Safety's website at: achieve.lausd.net/Page/3990.

As part of the proposed project, LAUSD will coordinate with the City of Los Angeles to install "yellow school crosswalk" pavement markings across Huston Street on the west side of Colfax Avenue at the intersection of Colfax Avenue and Huston Street. Additionally, it was observed that there were 21 elementary school children that cross Huston Street on the west side of Colfax Avenue during the morning hour. One of LADOT's criteria for a crossing guard is a minimum of 20 or more children attending elementary school who cross an intersection. Per LAUSD Reference Guide (REF-1404) for School Traffic Safety, a request for a crossing guard will be submitted to LADOT.

As described in the Draft MND, Section XIII, *Pedestrian Safety*, the proposed project as designed would improve pedestrian safety in the area. As part of the project design features, appropriate sight distance provisions would be made at the parking lot access driveways along Colfax Avenue and Huston Street.

Comment No. 14-5

(photo)

**Response No. 14-5**

The above comment is a photo provided by the commenter of the intersection of Colfax Avenue and Huston Street, which does not pertain to the content of the Draft MND. As such, no further response is required.

Comment No. 14-6

(photo)

**Response No. 14-6**

The above comment is a photo provided by the commenter of the intersection of Colfax Avenue and Huston Street, which does not pertain to the content of the Draft MND. As such, no further response is required.

APPENDICES
