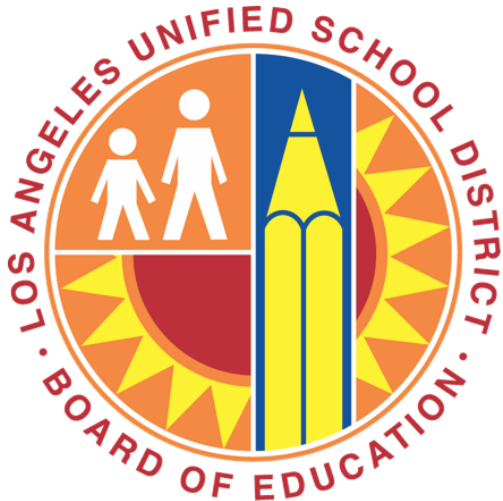


November 2019 | Initial Study/Mitigated Negative Declaration



JOHN F. KENNEDY HIGH SCHOOL

Comprehensive Modernization Project

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November 2019 | Initial Study/Mitigated Negative Declaration

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Comprehensive Modernization Project

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Abbreviations and Acronyms

AB	Assembly Bill
ADA	Americans with Disabilities Act
AFY	acre-feet per year
ANSI	American National Standards Institute
AQMP	Air Quality Management Plan
AV	Autonomous Vehicles
BMP	best management practice
BOE	Board of Education
CAAQS	California Ambient Air Quality Standards
CAPCOA	California Air Pollution Control Officers Association
CARB	California Air Resources Board
CCR	California Code of Regulations
CDE	California Department of Education
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CFR	Code of Federal Regulations
CGS	California Geological Survey
CH ₄	methane
CHPS	Collaborative for High-Performance Schools
CHRIS	California Historical Resources Information System
CIWMP	Countywide Integrated Waste Management Plan
CNDDDB	California Natural Diversity Data Base
CNEL	community noise equivalent level
CNPS	California Native Plant Society
CO	carbon monoxide
CO ₂	carbon dioxide
CRHR	California Register of Historical Resources
DDE	dichlorodiphenyldichloroethylene
DOC	Department of Conservation
DPR	Department of Parks and Recreation
DR	demand response
DSA	California Division of the State Architect
DTSC	Department of Toxic Substances Control

Abbreviations and Acronyms

EIR	environmental impact report
EMA	Emergency Management Agency
EMF	Electromagnetic Field
EOO	Emergency Operations Organization
EPA	Environmental Protection Agency
ESA	Environmental Site Assessment
FCI	Facilities Condition Index
FEMA	Federal Emergency Management Agency
FETU	Facilities Environmental Technical Unit
FHWA	Federal Highway Administration
FMMP	Farmland Mapping and Monitoring program
GHG	greenhouse gas
GIS	geographic information system
GWP	global warming potential
HRER	Historic Resources Evaluation Report
HS	high school
HVAC	heating, ventilation, and air conditioning
IDA	International Dark-Sky Association
IES	Illuminating Engineering Society
IPCC	Intergovernmental Panel on Climate Change
IS/MND	initial study/mitigation negative declaration
ITE	Institute of Transportation Engineer
LADWP	Los Angeles Department of Water and Power
LAFD	Los Angeles Fire Department
LAHCM	Los Angeles Historic-Cultural Monuments
LAMC	Los Angeles Municipal Code
LAPD	Los Angeles Police Department
LASPD	Los Angeles Schools Police Department
LAUSD	Los Angeles Unified School District
LOS	level of service
LST	localized significance threshold
LZ	lighting zones
MCD	Modified Consent Decree



Abbreviations and Acronyms

MEP	Maximum Extent Practicable
MLD	Most Likely Descendant
MLO	Model Lighting Ordinance
MRZ	mineral recovery zone
MT	metric tons
MW	megawatts
MWD	Metropolitan Water District
NAAQS	National Ambient Air Quality Standards
NAHC	Native American Heritage Commission
ND	negative declaration
NHTSA	National Highway Safety Administration
NMFS	National Marine Fisheries Services
NO ₂	nitrogen dioxide
NOI	Notice of Intent
NPDES	National Pollution Discharge Elimination System
NRHP	National Register of Historic Places
O ₃	ozone
OAERP	Operational Area Emergency Response Plan for the County
OEHHA	Office of Environmental Health Hazard Assessment
OEHS	Office of Environmental Health and Safety
OSHA	Occupational Safety & Health Administration
PCB	polychlorinated biphenyls
PDF	project design features
PEA-E	Preliminary Environmental Assessment Equivalent
PM ₁₀	particulate matter with an aerodynamic diameter less than or equal to 10 microns
PM _{2.5}	particulate matter with an aerodynamic diameter less than or equal to 2.5 microns
PPV	peak particle velocity
PRC	Public Resources Code
PSL	preliminary screening level
RCNM	Roadway Construction Noise Model
REC	recognized environmental condition
RS	Receiving Station
RTP/SCS	Regional Transportation Plan/Sustainable Communities Strategy

Abbreviations and Acronyms

RWQCB	Regional Water Quality Control board
SB	Senate Bill
SC	Standard Condition [of Approval]
SCAB	South Coast Air Basin
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SCCIC	South Central Coastal Information Center
SEA	Significant Ecological Area
SFB	San Fernando Basin
SLF	Sacred Lands File
SMP	Soil Management Plan
SO ₂	sulfur dioxide
SR	State Route
SRA	Source-Receptor Area
SUP	School Upgrade Program
SUSMP	Standard Urban Stormwater Mitigation Plan
SWPPP	Stormwater Pollution Prevention Plan
SWRCB	State Water Resources Control Board
TAC	Toxic Air Contaminants
TCR	Tribal Cultural Resources
TPH	total petroleum hydrocarbons
TWRP	Tillman Water Reclamation Plant
USFWS	United States Fish and Wildlife Service
UWMP	Urban Water Management Plan
VHFHSZ	Very High Fire Hazard Severity Zone
VMT	Vehicle Miles Traveled
VOC	volatile organic compound



1. Introduction

1.1 OVERVIEW

The Los Angeles Unified School District (LAUSD or District) is proposing a comprehensive modernization of John F. Kennedy High School, located at 11254 Gothic Avenue, City of Los Angeles, Los Angeles County, California. Comprehensive Modernization Projects are designed to address the most critical physical needs of the building and grounds at LAUSD campuses. Specifically, the John F. Kennedy High School campus (Kennedy HS or Campus) Comprehensive Modernization Project (Project) would include building replacement, renovation, modernization, and reconfiguration. The proposed Project is required to undergo an environmental review pursuant to the California Environmental Quality Act (CEQA). This Initial Study provides an evaluation of the potential environmental consequences associated with this proposed Project.

1.2 BACKGROUND

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

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

On December 13, 2016, the BOE approved the Project definition for the proposed Project to provide facilities that are safe, secure, and better aligned with the current instructional program. The proposed Project is designed to address the most critical physical concerns of the building and grounds at the Campus while providing renovations, modernizations, and reconfiguration as needed.⁴ On September 18, 2018, the BOE was informed that Facility Services Division had refined the scope for the 11 school sites, including Kennedy HS.

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

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

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

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

1. Introduction

1.3 CALIFORNIA ENVIRONMENTAL QUALITY ACT

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

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

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

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

1.4 ENVIRONMENTAL PROCESS

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

- 1) An activity directly undertaken by any public agency including but not limited to public works construction and related activities clearing or grading of land, improvements to existing public structures, enactment and amendment of zoning ordinances, and the adoption and amendment of local General Plans or elements thereof pursuant to Government Code Sections 65100-65700.
- 2) An activity undertaken by a person which is supported in whole or in part through public agency contacts, grants, subsidies, loans, or other forms of assistance from one or more public agencies.
- 3) An activity involving the issuance to a person of a lease, permit, license, certificate, or other entitlement for use by one or more public agencies. (California Code of Regulations [CCR] § 15378[a])

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

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

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

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

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



1. Introduction

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

1.4.1 Initial Study

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

1.4.2 Mitigated Negative Declaration

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

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

1. Introduction

1.4.3 Tiering

This type of Project is one of many that were analyzed in the LAUSD SUP Program EIR (SUP Program EIR) that was certified by the LAUSD BOE on November 10, 2015.¹⁰ LAUSD's SUP Program EIR meets the criteria for a Program EIR under CEQA Guidelines Section 15168 (a)(4) as one "prepared on a series of actions that can be characterized as one large Project and are related...[a]s individual activities carried out under the same authorizing statutory or regulatory authority and having generally similar environmental effects which can be mitigated in similar ways."

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

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

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

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

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

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

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

¹³ Ibid, at 4-8.

¹⁴ Ibid, at 1-7.



1. Introduction

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

1.4.4 Project Plan and Building Design

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

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

Standard Conditions of Approval for District Construction, Upgrade, and Improvement Projects. Standard Conditions of Approval for District Construction, Upgrade, and Improvement Projects were adopted by the BOE on February 5, 2019 (Board Report Number 241-18/19). SCs are environmental standards that are applied to District construction, upgrade, and improvement projects during the environmental review process by the OEHS CEQA team to offset potential environmental impacts. The SCs were largely compiled from established LAUSD standards, guidelines, specifications, practices, plans, policies, and programs. For each SC, applicability is triggered by factors such as the project type and existing conditions. These SCs are implemented during the planning, construction, and operational phases of the projects. The BOE adopted a previous version of the SCs as a supplement to the Program Environmental Impact Report (Program EIR) for the School Upgrade Program, which was certified by the BOE on November 10, 2015 (also Board Report No. 159-15/16). The most recently adopted SCs (LAUSD 2018) were updated in order to incorporate and reflect recent changes in the laws, regulations and the District's standard policies, practices and specifications (e.g., the Design Guidelines and Design Standards, which are routinely updated and are referenced throughout the Standard Conditions).¹⁷

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

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

¹⁷ LAUSD. 2018. Standard Conditions of Approval for District Construction, Upgrade, and Improvement Projects. Accessed, May 8, 2019. https://achieve.lausd.net/cms/lib/CA01000043/Centricity/Domain/135/2018_Standard_Conditions_UPDATE_final.pdf.

1. Introduction

Collaborative for High-Performance Schools. The proposed Project would include CHPS criteria points under seven categories: Integration, Indoor Environmental Quality, Energy, Water, Site, Materials and Waste Management, and Operations and Metrics. LAUSD is committed to sustainable construction principles and has been a member of the CHPS since 2001. CHPS has established criteria for the development of high-performance schools to create a better educational experience for students and teachers by designing the best facilities possible. CHPS-designed facilities are healthy, comfortable, energy efficient, material efficient, easy to maintain and operate, commissioned, environmentally responsive site, a building that teaches, safe and secure, community resource, stimulating architecture, and adaptable to changing needs (CHPS 2019).¹⁸ The proposed Project would comply with CHPS and LAUSD sustainability guidelines. The design team would be responsible for incorporating sustainability features for the proposed Project, including onsite treatment of stormwater runoff, “cool roof” building materials, lighting that reduces light pollution, water and energy-efficient design, water-wise landscaping, collection of recyclables, and sustainable and/or recycled-content building materials.

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

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

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

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

¹⁸ Collaborative for High Performance Schools. 2016. National Core Criteria. Accessed, May 8, 2019. <https://chps.net/criteria/national-core-criteria-0>.



1. Introduction

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

1.5 IMPACT TERMINOLOGY

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

- A finding of ***no impact*** is appropriate if the analysis concludes that the project would not affect the particular topic area in any way.
- An impact is considered ***less than significant*** if the analysis concludes that it would cause no substantial adverse change to the environment and requires no mitigation.
- An impact is considered ***less than significant with mitigation incorporated*** if the analysis concludes that it would cause no substantial adverse change to the environment with the inclusion of environmental commitments or other enforceable mitigation measures.
- An impact is considered ***potentially significant*** if the analysis concludes that it could have a substantial adverse effect on the environment. If any impact is identified as potentially significant, an EIR is required.

1.6 ORGANIZATION OF THE INITIAL STUDY

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

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

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

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

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

¹⁹ CHPS criteria are summarized. The full requirement can be found at <http://www.chps.net/dev/Drupal/California>.

1. Introduction

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

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

- A. Historic Resource Evaluation Report and DPR Form
- B. Air Quality, Greenhouse Gas Emissions, and Energy Modeling Data
- C. Tree Inventory Report
- D. Cultural Resources Database Searches
- E. Geotechnical Report
- F. Phase I Environmental Site Assessment, Preliminary Environmental Assessment, and Electromagnetic Field Survey
- G. Noise Modeling Data
- H. Site Circulation Report



2. Environmental Setting

2.1 PROJECT LOCATION

As shown in Figure 1, Regional Location, Kennedy HS is one of sixty comprehensive high schools in the Los Angeles Unified School District (LAUSD) located 23 miles northwest of downtown Los Angeles in the San Fernando Valley. The approximately 27.4-acre school site is located at 11254 Gothic Avenue (Assessor Parcel Numbers [APNs] 2681-010-911, -910, -909) in the neighborhood of Granada Hills in the City of Los Angeles in Los Angeles County. As shown in Figure 2, Project Location, the Kennedy HS Campus is generally bound by Simonds Street to the north, Woodley Avenue to the east, Gothic Avenue and a portion of Index Street to the west, and Donmetz Street to the south.

Regional access to the site is from the Woodley Avenue freeway exit (Exit 41) off State Route 118 (SR-118) and from the San Fernando Mission Boulevard freeway exit (Exit 71B) from Interstate 405 (I-405). Public access to the Main Office of Kenney HS is from Gothic Avenue from either San Fernando Mission Boulevard to the south or from Rinaldi Street to the north.

Public transit to the Project site is provided via Metro Local Route 237, which has two bus stops: the northbound Metro 237 on the northeast corner of Index Street and the southbound Metro 237 on the southwest corner of Index Street. The Metro Local Route 237 operates seven days a week and runs between Granada Hills and Hollywood via Woodley Avenue.

Additionally, the Metro Orange Line (Bus Rapid Transit) Woodley Station is located at the intersection of Woodley Avenue and Victory Boulevard approximately six miles south of the Project site.

2.2 SURROUNDING LAND USES

As shown in Figure 3, Surrounding Land Uses, the Project site is generally surrounded by single-family residential homes and is approximately 720 feet (0.14-mile) northeast of the SR-118 at its closest point.

Directly north of the Project site is Simonds Street, followed by a 220-foot-wide Los Angeles Department of Water and Power (LADWP) high-voltage electrical transmission line easement followed by single-family homes along Kalisher Street approximately 275 feet to the north of the site. A wholesale landscaping company is located within a portion of the easement, which continues within the easement until reaching the LADWP Rinaldi Receiving Station (RS) approximately 0.35 mile northeast of the Project site. The Granada Hills Little League fields and the Van Norman Lakes Reservoir are also located approximately 0.25 mile northeast of the Project site.

Directly east of the Project site is Woodley Avenue, followed by single-family residential homes located approximately 100 feet east of the property boundary.

2. Environmental Setting

Directly south of the Project site is a commercial/strip mall shopping center, surface parking lot, and baseball batting cages. Additionally, single-family homes are located adjacent to surface parking near the tennis courts that are located on the southwestern corner of the Project site. The closest residence is adjacent to the Project site's property line (approximately 60 feet from the tennis courts) on Valjean Avenue.

Single-family residential homes are located directly west of the Project site across Gothic Avenue, approximately 60 feet east of the property boundary.

As shown in Figure 3, Bull Creek, a concrete-lined drainage that is tributary to the Los Angeles River, flows from two points north to south beneath the Project site. One portion of Bull Creek enters the Campus from along Odessa Avenue. From here, Bull Creek transitions into subterranean pipelines immediately north of the Project site near the intersection of Simonds Street, Gothic Avenue, and Index Street, remains subterranean beneath the Project site, and then daylights at the southern property boundary near Valjean Avenue. The other portion of Bull Creek enters the Campus from east of Swinton Avenue and west of Woodley Avenue. No buildings can be built over this portion.

2.3 CAMPUS HISTORY

Similar to much of the San Fernando Valley, the Kennedy HS property was historically used for agricultural purposes through much of the early- and mid-twentieth century. Between 1952 and 1964, the rapid growth in Los Angeles in the postwar period extended into the San Fernando Valley, and agricultural lands were transformed into residential suburbs. In 1966, in response to population growth and overcrowding of nearby schools, voters approved funding for the construction of a new high school in the Granada Hills neighborhood, and preliminary plans were commissioned by the architectural firm of Stewart S. Granger & Associates. The school was originally planned to include 78 classrooms with a capacity of 2,500 students (Appendix A).

The Project site was cleared and graded by 1969, in preparation for construction of the new school. The original Campus buildings featured a unique Mid-Century-Modern/New Formalist architectural style with central courtyards, hardscaping and gathering areas, and sheltered corridors and circulation corridors. Kennedy HS opened its doors in 1971 as part of the LAUSD (Appendix A).

The original site plan and majority of the original buildings have remained largely unaltered since this time, except for the following changes. Following the 1994 Northridge Earthquake, the original Administration Building and Gymnasium Building experienced substantial damage. The Administration Building was demolished that same year and replaced in 2002 with the current building. The original gymnasium was demolished in 2002 and replaced the following year by the current Gymnasium Building. The site of the original Gymnasium was developed into a softball field after the building's demolition. Additionally, tennis courts were constructed to the south of the Science Building, which replaced a former surface parking lot (Rincon 2018).

In 2018, a Historical Resources Evaluation Report (see Appendix A) determined that Kennedy HS appears eligible for both the California Register of Historical Resources and for local designation as a historic district, due to its embodiment of the Mid-Century Modern/New Formalist architectural style as applied to an institutional/educational facility. Therefore, the building is considered a historical resource for the purposes of CEQA.



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2.4 EXISTING CONDITIONS

2.4.1 Existing Campus

Kennedy HS serves students grades 9th through 12th within the framework of small learning communities. Historic enrollment at Kennedy HS is shown in Table 1 below. Although most students are residents of the Granada Hills community, magnet students are bused in from various parts of Los Angeles to participate in the Architecture, Digital Arts & Film Making magnet program. Kennedy HS is also home to the Jane Addams Continuation High School and the Kennedy Clinic & Family Resource Center.²⁰

Table 1
Enrollment at Kennedy HS, 2015-2019

Grade	2015 – 2016 School Year	2016 – 2017 School Year	2017 – 2018 School Year	2018 – 2019 School Year
9	573	614	622	733
10	560	543	607	608
11	481	494	507	545
12	485	482	478	463
Total Enrollment	2,099	2,133	2,214	2,349
Source: California Department of Education 2019 ²¹				

There are approximately 135 teaching staff at Kennedy HS, and the regular school day runs from 7:56 a.m. to 2:49 p.m.²² District-operated bus service is available to special education students and students enrolled in the magnet program.

As shown in Figure 4, Existing Conditions, the Project site includes a total of 48 buildings, including 18 permanent buildings constructed in 1971, three permanent buildings added to the Campus between 2000 and 2003, and 25 portable, non-permanent structures that were added between 1980 and 2003.

Organized around a prominent central courtyard, the Campus consists of one- and two-story square and rectangular buildings. The southern and eastern portions of the Project site are primarily composed of recreational facilities in the form of sports fields, tennis courts, a running track, and the Gymnasium. Permanent Campus buildings are connected to one another via sidewalks and covered breezeways (Appendix A). The Kennedy HS Campus Buildings are listed in Table 2 and their general locations are identified Figure 4.

²⁰ John F. Kennedy High School (website). 2019. Kennedy's Architecture/Digital Design/Filmmaking Magnet. Accessed, June 25, 2019. https://www.jfkcougars.org/apps/pages/index.jsp?uREC_ID=151953&type=d&pREC_ID=524011.

²¹ California Department of Education. 2019. Enrollment Multi-Year Summary by Grade – John F. Kennedy High Report. Accessed, May 9, 2019. <https://dq.cde.ca.gov/dataquest/dqcensus/EnrGrdYears.aspx?cds=19647331939941&aggllevel=school&year=2018-19>

²² John F. Kennedy High School. 2018. 2018-19 Bell Schedule. Accessed, June 25, 2019. <https://4.files.edl.io/6b58/08/27/18/212453-4a2d5e69-3150-40f4-8330-b7a7836467ca.pdf>.

2. Environmental Setting

**Table 2
Existing Buildings and Structures**

Bldg. No.	Building	Size (Square Feet)	Year Built	Building Type	Historic Contributor?
Permanent Buildings					
1	Library Building	10,911	1971	Permanent	Yes
2	Science Building	53,893	1971	Permanent	Yes
3	2-Story Classroom Building #1	40,800	1971	Permanent	Yes
4	Student Store	1,356	1971	Permanent	Yes
5	Cafeteria Building	11,438	1971	Permanent	Yes
6	Oral Arts Building	15,349	1971	Permanent	Yes
7	Adult School Office (Special Education)	2,035	1971	Permanent	Yes
8	Classroom Building #2	2,544	1971	Permanent	Yes
9	Music Building	3,764	1971	Permanent	Yes
10	Transformer/Vault	2,657	1971	Permanent	No
11	Boiler Building/Vault	4,090	1971	Permanent	No
12	Classroom Building #3	2,559	1971	Permanent	No
13	Shop Building	24,658	1971	Permanent	No
14	Utility Building	2,171	1971	Permanent	No
15	Flammable Storage	234	1971	Permanent	No
16	Sanitary Building #1	1,201	1971	Permanent	No
17	Announcers Building/Booth	68	1971	Permanent	No
18	Sanitary Building #2	1,183	1971	Permanent	No
19	Gymnasium Building	42,292	2003	Permanent	No
20	Existing Classroom Building #4	8,794	2000	Permanent	No
21	Administration and Classroom Building	45,401	2002	Permanent	No
22	Lunch Pavilion	10,947	-	Permanent	No
23	Concessions	192	-	Permanent	No
Portable Buildings					
24	A-876 Standard Classroom Relocatable	869	1986	Portable	No
25	A-877 Standard Classroom Relocatable	869	1986	Portable	No
26	A-878 Standard Classroom Relocatable	869	1986	Portable	No
27	A-879 Standard Classroom Relocatable	867	1986	Portable	No
28	A-880 Standard Classroom Relocatable	869	1986	Portable	No



2. Environmental Setting

Table 2
Existing Buildings and Structures

Bldg. No.	Building	Size (Square Feet)	Year Built	Building Type	Historic Contributor?
29	A-881 Standard Classroom Relocatable	867	2000	Portable	No
30	A-2070 Standard Classroom Relocatable	960	1994	Portable	No
31	A-2071 Standard Classroom Relocatable	961	1994	Portable	No
32	A-2202 Standard Classroom Relocatable	960	2003	Portable	No
33	A-2203 Standard Classroom Relocatable	960	2003	Portable	No
34	A-2271 Standard Classroom Relocatable	962	2003	Portable	No
35	A-4138 Standard Classroom Relocatable	1920	2003	Portable	No
36	A-4139 Standard Classroom Relocatable	1920	2003	Portable	No
37	A-4140 Standard Classroom Relocatable	1920	2003	Portable	No
38	AA-4141 Standard Classroom Relocatable	1923	2003	Portable	No
39	AA-4142 Standard Classroom Relocatable	1923	2003	Portable	No
40	AA-3910 Standard Classroom Relocatable	1921	2000	Portable	No
41	Single Modular	960	2003	Portable	No
42	Sanitary Building #3	480	2003	Portable	No
43	Storage Room	375	1980	Portable	No

Source: Rincon 2018; LAUSD 2011

2.4.2 Existing Site Access, Circulation, and Parking

Site Access and Circulation

As shown in Figure 5, Site Access, Circulation, and Parking, the Project site is generally bound by Simonds Street to the north, Woodley Avenue to the east, Gothic Avenue to the west, and Donmetz Street to the south. Gothic Avenue is a north-south running, two-way street with one lane in each direction that binds the Project site's western perimeter. Woodley Avenue is a large north-south running roadway on the Project site's eastern perimeter, classified as an Avenue II by the City of Los Angeles, with two lanes in each direction, with a 10-

2. Environmental Setting

foot-wide center left-turn lane dividing the opposing lanes. Woodley Avenue includes dedicated Class II bike lanes in each direction and provides pedestrian access to the Project side via the public sidewalk system.

The Kennedy HS entrance gate fronts Gothic Avenue and serves as primary access for students via a south–north running passenger loading/school drop-off zone. Vehicles access Gothic Avenue on northbound from south of Donmetz Street, and southbound from Simonds Street. The loading/drop-off zone is located on the east side of Gothic Avenue. Parking is prohibited on the west side of the curb; nonetheless, loading/drop-off occurs on the west side curb. This decreases the width of travel lanes on Gothic Avenue.

Vehicles on westbound and eastbound of Simonds Street mainly come from Woodley Avenue and Gothic Avenue, respectively. Although prohibited, the north side and south side of Simmonds are used for loading/drop-off. This creates queues on Simonds Street in both travel directions. There is a loading/unloading zone for school buses on Simonds Street for approximately 950 feet west of Woodley Avenue.

Fire department and emergency vehicle access to the Project site is also provided on Gothic Avenue and Simonds Street via separate fire lanes that lead to a surface parking lot on the northwestern corner of the Project site. Limited access to the associated Jane Addams Continuation High School is provided via Donmetz Street, a short, paved local street that joins Valjean Avenue to Gothic Avenue.

Currently, there are high pedestrian volumes from parking lot gates across the parking lot driveways, which creates conflicts between pedestrians and vehicles in the parking lot and driveways. There is also a high pedestrian at the intersection of Gothic Avenue/Index Street and Gothic Avenue/Donmetz Street.

Parking

Kennedy HS has six on-site parking lots including two main staff and faculty lots, two main student parking lots, and two staff and faculty parking lots shared with the Jane Addams Continuation High School. These parking spaces combined provide a total of approximately 250 parking spaces (marked and unmarked), including 11 accessible parking spaces and three van-accessible parking spaces. As shown on Figure 5, the two main staff and faculty lots and one student parking lot is located on the north side of Campus, and the two shared staff and faculty lots and one student parking lot is located on the south side of Campus.

The main faculty lots are located on the northwestern corner of Campus and in the northcentral part of Campus adjacent to the baseball field. Limited access to the staff and faculty lots is provided via a gated driveway on Simonds Street immediately west of the baseball field. The staff and faculty lot located in the northwestern corner contains 116 marked spaces, including 4 accessible parking spaces and 1 van-accessible parking space. The staff and faculty lot adjacent to the baseball field contains 3 marked spaces, including 3 accessible parking spaces and 1-van accessible space. The main student parking lot located at the northeast corner of the Campus is accessible through a gated service road at the intersection of Woodley Avenue and Index Street. This lot contains 39 marked spaces, including 2 accessible parking spaces, and approximately 50 bicycle racks are provided.

The two shared staff and faculty parking lots are located at the south side of the Campus, north and east of the Jane Addams High School. The parking lot on the north side of Jane Addams High School contains 11 marked spaces and the parking lot on the eastside contains 12 marked spaces, including 2 accessible parking



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spaces and 1 van-accessible space. The staff and faculty parking lot immediately west off the football/soccer field contains 15 marked spaces. The student parking lot on the south side of the school adjacent to the tennis courts is unmarked, or the markings have faded but could accommodate an estimated 45 vehicles. These two shared staff and faculty lots and student lot can be accessed through a gated entrance on Donmetz Street, 150 feet east of Gotchic Avenue.

2.5 GENERAL PLAN AND EXISTING ZONING

As shown in Figure 6a, General Plan Land Use Designations, and Figure 6b, Zoning Designations, the proposed Project site (APNs 2681-010-911, -910, -909) has a General Plan Land Use Designation of “Public Facilities” and is zoned as PF-1. The “PF” zone allows for construction/alteration/enlargement of structures onsite for secondary schools. The land use element of the General Plan is comprised of 35 community plans, which guide the future development of the City of Los Angeles. The Project site is within the Granada Hills-Knollwood Community Plan Area.

The surrounding single-family neighborhoods are zoned low density residential (RS-1); Bull Creek is zoned open space (OS-1); the LADWP easement is zoned public facilities (PF-1); and the commercial property to the south of the Project site is zoned C1-1VL, where “1” is the Height District No. 1 and “VL” is Very Limited Height District.

The California legislature grants school districts the power to exempt school property from local zoning requirements, provided the school district complies with the terms of Government Code Section 53094. Pursuant to this code, in 2019, the LAUSD Board of Education adopted a resolution to exempt all LAUSD school sites from local land use regulations.²³

2.6 NECESSARY APPROVALS

Responsible Agencies

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

- California Department of General Services, Division of State Architect. Approval of site-specific construction drawings.
- State Water Resources Control Board. General Construction Activity Permit, including the Storm Water Pollution Prevention Plan.
- City of Los Angeles, Public Works Department. Permit for curb, gutter, and other offsite improvements.
- City of Los Angeles, Fire Department. Approval of plans for emergency access and emergency evacuation.

²³ LAUSD. Board of Education Report. Report. 18/19 ed. Vol. 256. Los Angeles, CA: LAUSD, 2019.

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Trustee Agencies

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

State

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

Regional

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

Local

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

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

Yes. See Section XIX, Tribal Cultural Resources for more information.

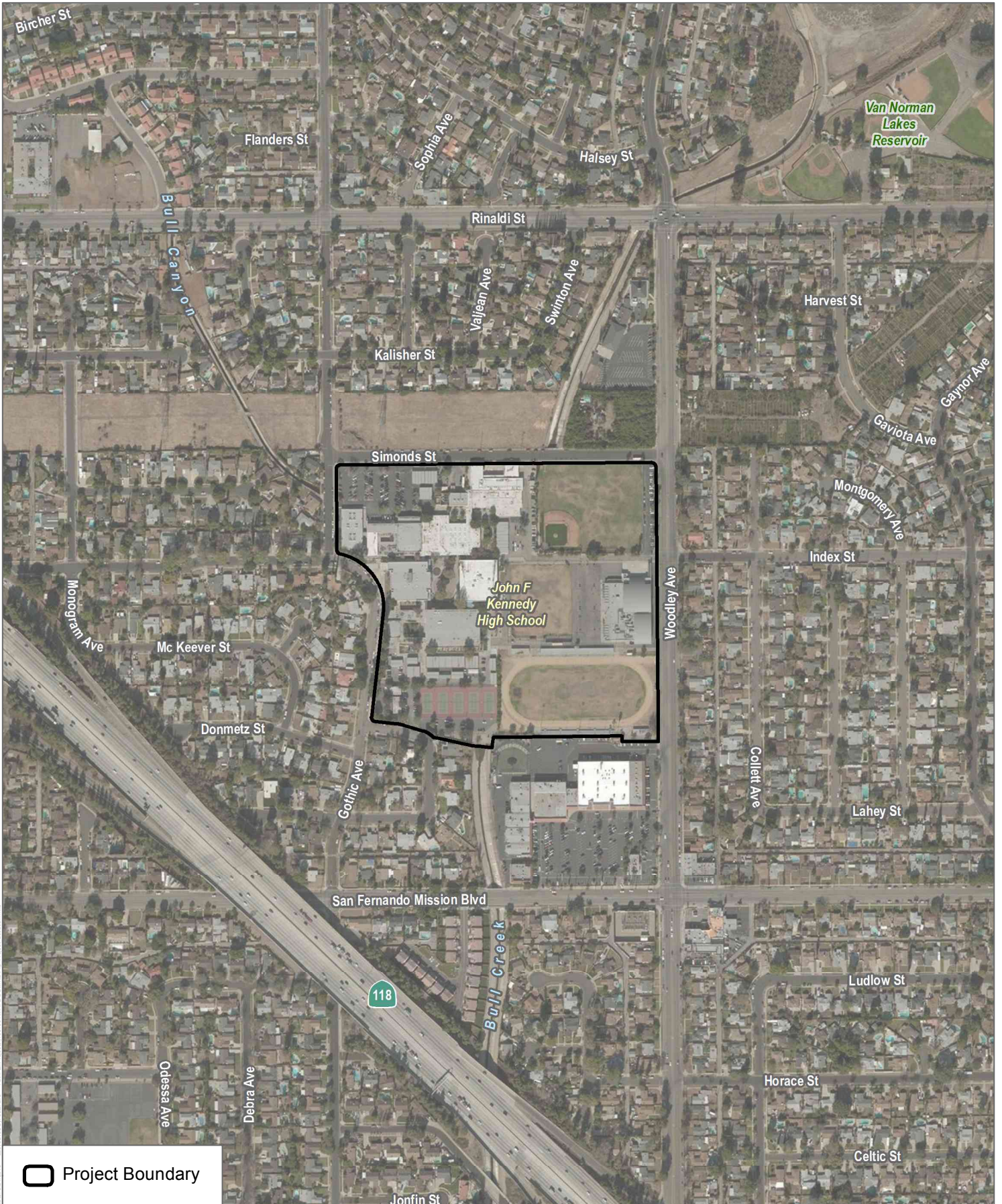
Note: Conducting consultation early in the CEQA process allows tribal governments, lead agencies, and Project proponents to discuss the level of environmental review, identify and address potential adverse impacts to tribal cultural resources, and reduce the potential for delay and conflict in the environmental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



2. Environmental Setting

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SOURCE: Bing, Open Street Map



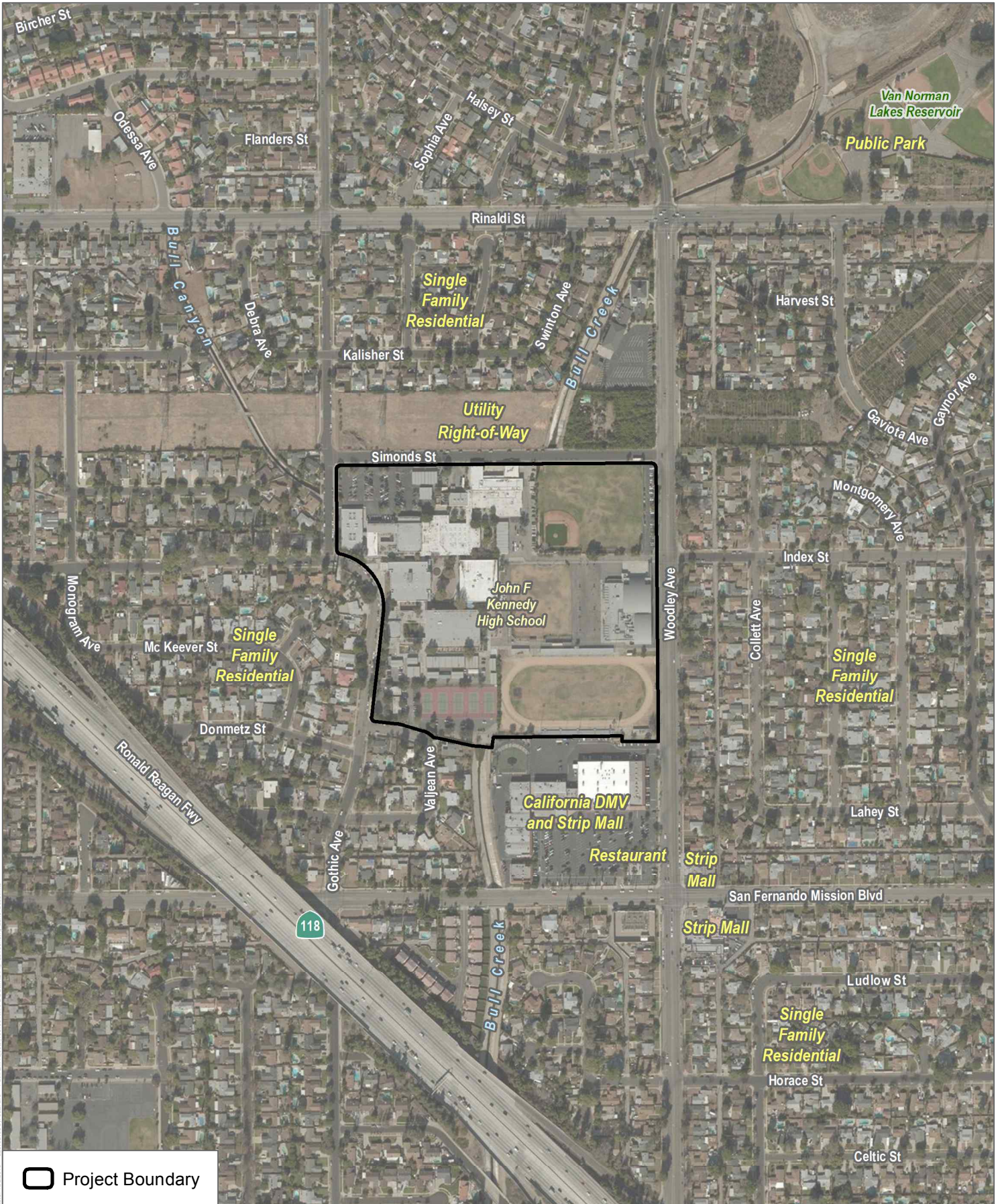
FIGURE 2
Project Location

John F. Kennedy High School Comprehensive Modernization Project

2. Environmental Setting

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SOURCE: Bing, Open Street Map



FIGURE 3
Surrounding Land Uses
 John F. Kennedy High School Comprehensive Modernization Project

2. Environmental Setting

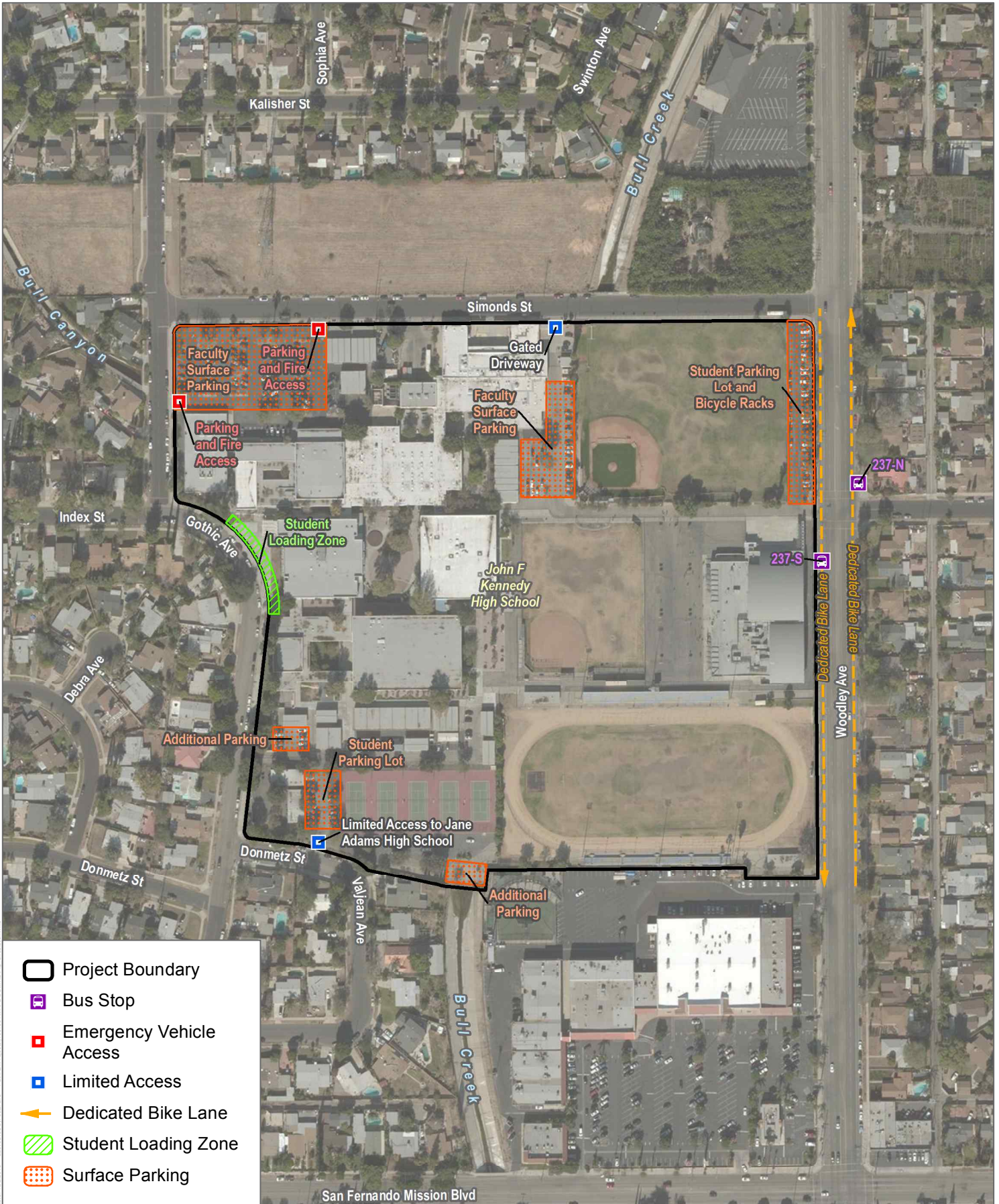
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2. Environmental Setting

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SOURCE: Bing, Open Street Map

FIGURE 5

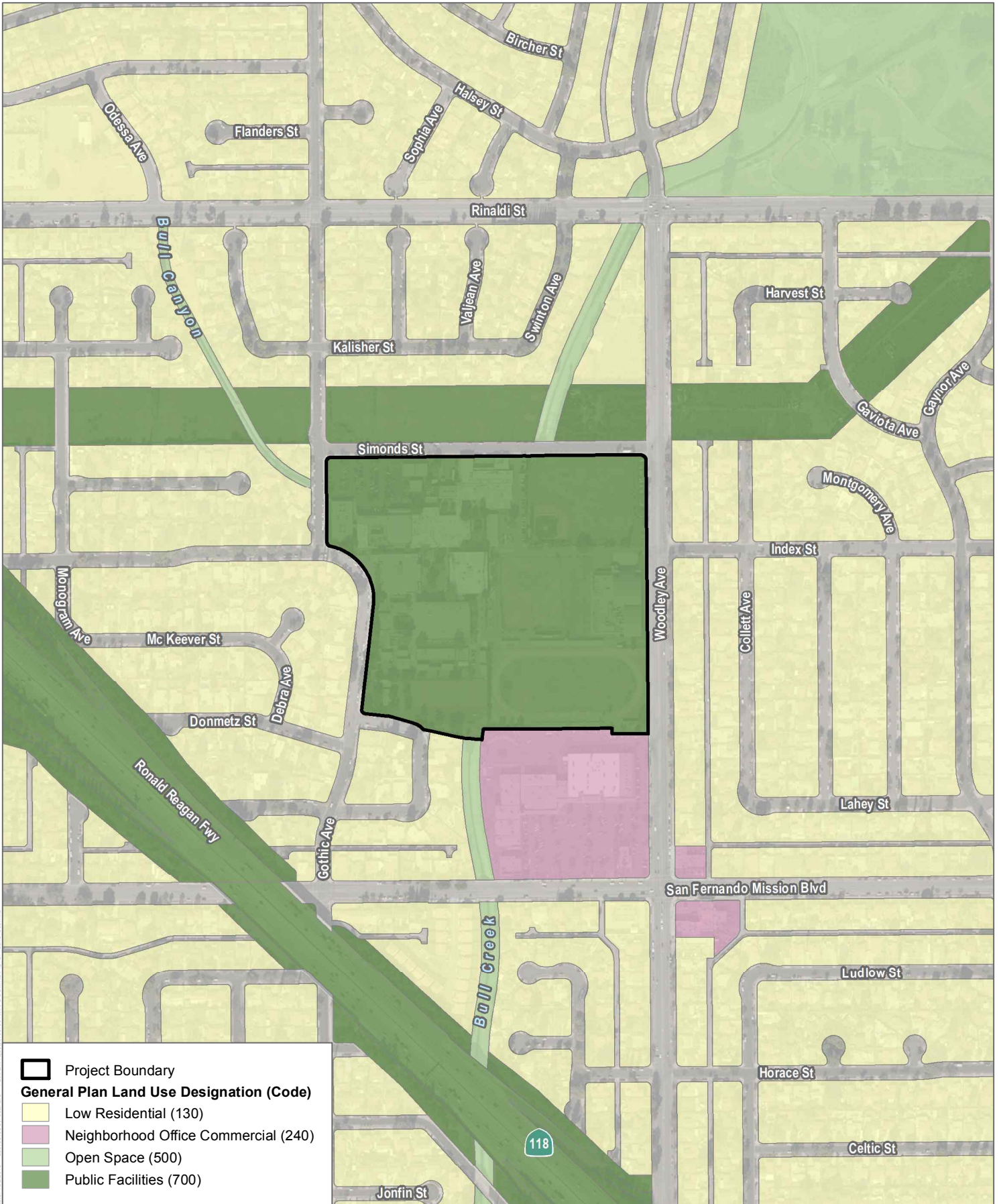
Site Access, Circulation and Parking

John F. Kennedy High School Comprehensive Modernization Project

2. Environmental Setting

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SOURCE: Bing, Open Street Map

FIGURE 6A

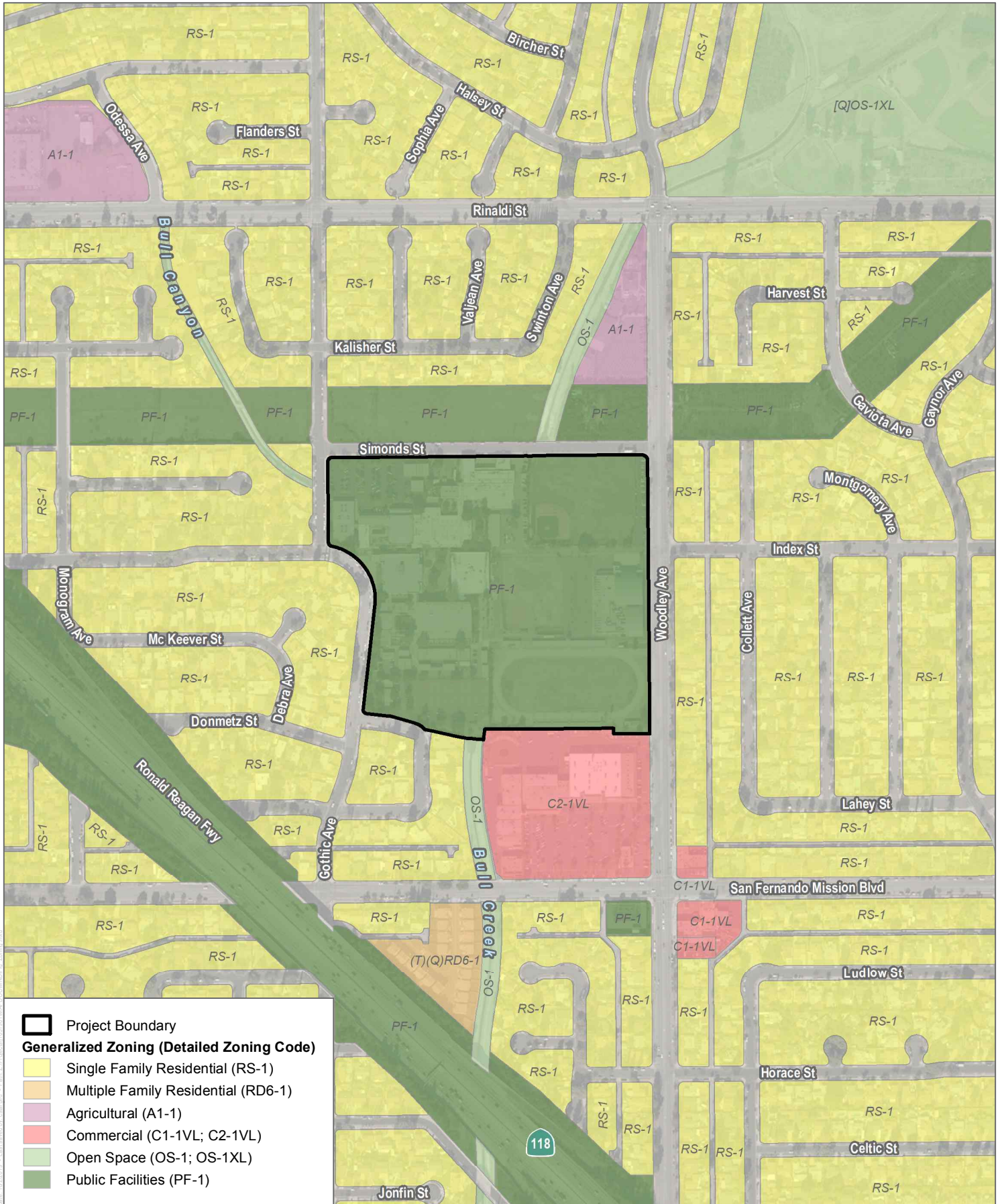
General Plan Land Use Designations

John F. Kennedy High School Comprehensive Modernization Project

2. Environmental Setting

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SOURCE: Bing, Open Street Map



FIGURE 6B

Zoning Designations

John F. Kennedy High School Comprehensive Modernization Project

2. Environmental Setting

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3. Project Description

3.1 BACKGROUND

Purpose and Need for the Project. The proposed Project has been developed under the LAUSD's SUP to improve student health, safety and education through the modernization of school facilities. Kennedy HS was identified as one of 22 schools in the District most in need of an upgrade due to the physical condition of the facilities. Based on an assessment of the following conditions, the 22 proposed school sites were identified as having a multitude of critical physical conditions that may pose a health and safety risk or negatively impact a school's ability to deliver the instructional program and/or operate:²⁴

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

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

- Schools Should Be Physically Safe and Secure

²⁴ LAUSD. December 13, 2016. Board Report No. 205-16/17.

3. Project Description

- School Building Systems Should Be Sound and Efficient
- School Facilities Should Align with Instructional Requirements and Vision

Furthermore, six core objectives/principles have been established for scoping of Comprehensive Modernization Projects undertaken under the SUP:²⁵

- 1) The buildings identified to be seismically vulnerable must be addressed.
- 2) The buildings will be retrofitted, modernized, and/or demolished and replaced depending on the level of effort required to address the seismic vulnerabilities, the historic context of the building/site, and the approach that best ensures compliance with DSA requirements.
- 3) The buildings, grounds, and site infrastructure that have significant/severe physical conditions that already do, or are highly likely in the near future to pose a health and safety risk, or negatively impact a school's ability to deliver the instructional program and/or operate should be addressed.
- 4) The broken or failing systems, infrastructure, and/or components in these buildings will be repaired and/or replaced. The comprehensive modernization project will not significantly modernize and update the building as a whole, nor the project demolish and replace with a new building with a few exceptions. The exceptions to this principle are ancillary building such as, but not limited to, lunch shelters, storage units, M&O buildings, and outdated and inaccessible federal buildings.
- 5) The District school's reliance on relocatable buildings, especially for K–12 instruction, should be significantly reduced.
- 6) Necessary and prioritized upgrades must be made throughout the school site in order to comply with the program accessibility requirements of the ADA Title II Regulations, and the provisions of the Modified Consent Decree (MCD).
- 7) The exterior conditions of the school site will be addressed to improve the visual appearance including landscape, hardscape, and painting.
- 8) The interior of classrooms and adjacent interior corridors that would otherwise not be addressed will be improved. Improvements may include new interior paint, improvements to flooring systems, and upgraded permanent classroom fixtures such as window treatment/blinds and whiteboards.

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

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

²⁵ Ibid.



3. Project Description

- 4) Address compliance with Executive Order 12898: address Environmental Justice in minority populations and low-income populations.
- 5) Reduce the reliance on portable classrooms.
- 6) Maximize the use of limited bond funds to provide modern, permanent classroom facilities.
- 7) Reconstruct and modernize Kennedy HS to provide an educational facility for students in the 21st century and beyond.
- 8) Replace buildings and infrastructure that have reached the end of their useful lives.
- 9) Reduce amount of stormwater runoff drainage and improve quality of runoff by increasing pervious surfaces on campus.
- 10) Improve campus access and circulation especially for emergency vehicles and personnel.
- 11) Provide upgrades throughout the school site in order to comply with the program accessibility requirements of the ADA Title II Regulations, and the provisions of the MCD, consistent with the District *Self-Evaluation and Transition Plan Under the Americans with Disabilities Act*.²⁶
- 12) Decrease campus energy use by upgrading or replacing facilities and incorporating standards developed by the CHPS.

3.2 PROPOSED PROJECT

The proposed Project would substantially modernize most of the Kennedy HS Campus. As shown in Figure 7, Proposed Site Plan and summarized in Table 3, Project Details, the proposed Project consists of the removal of portable classroom buildings, construction of new school facilities, and improvements to existing school facilities. Renderings of the new classroom are shown in Figures 8a through 8d. The Project scope also includes the placement of interim facilities, as necessary and subject to all relevant codes and regulations, to replace facilities and associated functions lost during construction.

The proposed Project would not increase the current capacity of the Campus. The Project would be completed under LAUSD's SUP. As such, the goals of the Project are consistent with the SUP's goal to build, modernize, and repair school facilities to improve student health, safety, and educational quality.

When completed, the proposed Project would provide 100 standard classrooms, which is a reduction of 3 classrooms from the current count of 103 standard classrooms. Changes to the Campus buildings are summarized in Table 3, *Project Details*.

²⁶ LAUSD, with the guidance of Irene Bowen, ADA One, LLG and Evan Terry Associates, LLC. October 10, 2017. Self-Evaluation and Transition Plan Under the Americans with Disabilities Act. Available at: <https://achieve.lausd.net/cms/lib/CA01000043/Centricity/Domain/821/AAA%20Self-Evaluation%20and%20Transition%20Plan%20Under%20the%20ADA%20APPROVED%20101017.pdf>

3. Project Description

The proposed Project would include several different aspects based on the relative need for replacement, retrofitting, and remodeling. Specifically, the Project would include:²⁷

- Removing and replacing those classrooms currently in portable buildings with new permanent classrooms. As shown in Figure 8d, the new classroom building would provide an administrative office, general classrooms, special education classrooms, science classrooms, and additional storage and workroom space. As shown in Table 3, 22 portable classroom buildings containing 30 classrooms would be removed from the Campus. To replace those classrooms, a new two-story, approximately 20,581 square foot building containing ten classrooms would be constructed in the southern portion of the Campus currently occupied by portable buildings.
- Remodeling the following facilities to improve seismic safety and support the educational program:
 - Classroom Buildings (1, 2 & 3)
 - Library Building
 - Science Building
 - Student Store Building
 - Cafeteria Building
 - Oral Arts Building
 - Music Building
 - Shop Building
 - Adult School Office (Special Education) Building
- Improving the interior conditions of classroom buildings such as painting, and window treatments.
- Completing site upgrades:
 - Site-wide infrastructure improvements, including sewer, water, and electrical utilities
 - Site-wide upgrades to remove identified and prioritized barriers to program accessibility.
 - Completing improvements as required by the Americans with Disabilities Act (ADA), Division of the State Architect (DSA), and related improvements or mitigations to ensure compliance with local, state, and/or federal facilities requirements required by these or other agencies or regulations.

²⁷ During construction, students vacated from their classrooms to accommodate the improvements associated with the Project would be relocated to temporary classrooms onsite.



3. Project Description

3.2.1 Project Details

The proposed Project would be constructed in two 30-month phases, occurring over a construction period of approximately 60 months. Specifically, the proposed Project would include the changes to the Campus Buildings shown in Table 3. The proposed improvements to Kennedy HS would result in a total of 149,630 square feet of remodel; 23,530 square feet of demolition; and, the construction of a new 20,581 square foot building on a southwestern portion of the Campus. Renderings of the new classroom building are shown in Figures 8a through 8d.

**Table 3
Project Details**

Bldg. No.	Building	Size (square feet)	Building Type	Proposed Action (square feet)			
				Existing to Remain	Remodel	Demolish	New Construction
Permanent Buildings							
1	Library Building	10,911	Permanent	--	3,324	--	--
2	Science Building	54,037	Permanent	--	54,037	--	--
3	2-Story Classroom Building #1	40,800	Permanent	--	29,768	--	--
4	Student Store	1,356	Permanent	--	1,356	--	--
5	Cafeteria Building	11,438	Permanent	--	11,362	--	--
6	Oral Arts Building	15,668	Permanent	--	15,668	--	--
7	Adult School Office (Special Education)	2,035	Permanent	--	1,800	--	--
8	Classroom Building #2	2,544	Permanent	--	2,544	--	--
9	Music Building	3,764	Permanent	--	3,214	550	--
10	Transformer /Vault	2,657	Permanent	2,657	--	--	--
11	Classroom Building #3	2,559	Permanent	--	2,559	--	--
12	Shop Building	23,998	Permanent	--	23,998	--	--

3. Project Description

**Table 3
Project Details**

Bldg. No.	Building	Size (square feet)	Building Type	Proposed Action (square feet)			
				Existing to Remain	Remodel	Demolish	New Construction
13	Utility Building	2,171	Permanent	2,171	--	--	--
14	Flammable Storage	234	Permanent	234	--	--	--
15	Sanitary Building #1	1,201	Permanent	1,201	--	--	--
16	Sanitary Building #2	1,183	Permanent	1,183	--	--	--
17	Gymnasium Building	42,292	Permanent	42,292	--	--	--
18	Existing Classroom Building #4	8,794	Permanent	8,794	--	--	--
19	Administration and Classroom Building	45,401	Permanent	45,401	--	--	--
20	Concessions	192	Permanent	192	--	--	--
21	New Classroom Building	20,581	Permanent	--	--	--	20,581
Portable Buildings							
22	A-876 Standard Classroom Relocatable	869	Portable	--	--	869	--
23	A-877 Standard Classroom Relocatable	869	Portable	--	--	869	--
24	A-878 Standard Classroom Relocatable	869	Portable	--	--	869	--
25	A-879 Standard Classroom Relocatable	867	Portable	--	--	867	--



3. Project Description

**Table 3
Project Details**

Bldg. No.	Building	Size (square feet)	Building Type	Proposed Action (square feet)			
				Existing to Remain	Remodel	Demolish	New Construction
26	A-880 Standard Classroom Relocatable	869	Portable	--	--	869	--
27	A-881 Standard Classroom Relocatable	867	Portable	--	--	867	--
28	A-2070 Standard Classroom Relocatable	960	Portable	--	--	960	--
29	A-2071 Standard Classroom Relocatable	961	Portable	--	--	961	--
30	A-2202 Standard Classroom Relocatable	960	Portable	--	--	960	--
31	A-2203 Standard Classroom Relocatable	960	Portable	--	--	960	--
32	A-2271 Standard Classroom Relocatable	962	Portable	--	--	962	--
33	A-4138 Standard Classroom Relocatable	1920	Portable	--	--	1,920	--
34	A-4139 Standard Classroom Relocatable	1920	Portable	--	--	1,920	--
35	A-4140 Standard Classroom Relocatable	1920	Portable	--	--	1,920	--

3. Project Description

**Table 3
Project Details**

Bldg. No.	Building	Size (square feet)	Building Type	Proposed Action (square feet)			
				Existing to Remain	Remodel	Demolish	New Construction
36	AA-4141 Standard Classroom Relocatable	1923	Portable	--	--	1,923	--
37	AA-4142 Standard Classroom Relocatable	1923	Portable	--	--	1,923	--
38	AA-3910 Standard Classroom Relocatable	1921	Portable	--	--	1,921	--
39	Single Modular	960	Portable	--	--	960	--
40	J-0305 Sanitary Building #3	480	Portable	--	--	480	--
41	Red Cross Container	240	Portable	240	--	--	--
42	M-1006 Storage Room	375	Portable	375	--	--	--
Totals				106,525	149,630	23,530	20,624
Source: LAUSD 2019							

3.2.2 Site Access, Circulation, and Parking

The primary access to Kennedy HS would continue to be provided from Index Street to Gothic Avenue via the north-south running school loading zone (see Figure 5). Proposed site access would generally remain consistent with existing conditions, as described in Section 2.4.2. Upon demolition of portables 41 through 47, additional parking spaces would be provided in the southwest corner of the Campus. As shown on Figure 7, the proposed Project would provide 394 parking spaces, more than the 309 spaces currently provided and 243 spaces required per LAUSD parking requirements.

3.2.3 Landscaping

The proposed Project would involve removal and replacement of existing landscaping in selected areas of the Campus. The landscape design would comply with LAUSD School Design Guidelines. CHPS criteria would



3. Project Description

be implemented where appropriate. Irrigation systems would be installed compliant with LAUSD School Design Guidelines and Standards, CALGreen, and CHPS requirements, with a dedicated meter, new pressure reducing backflow, master valve, flow sensor, and smart controller to increase irrigation efficiency.²⁸ Plant material would comply with the LAUSD approved plant list and be grouped according to hydrozones. Planting areas would be amended accordingly per agronomist soils report in order to improve the soil quality, and water holding capacity.

Clear and accessible paths of travel as required by the ADA would be provided throughout the Campus. Any P.E. stations to be removed would be replaced with a one-to-one ratio of play value or greater than existing conditions. Site lighting would be integrated into the landscape design to provide safety and visibility on Campus and consist of wall mounted building lights, light posts, and pathway lighting. Additional exterior Campus lighting would comply with LAUSD School Design Guidelines.

The Tree Inventory Report prepared by Carlberg Associates (Appendix C) inventoried 177 trees on the Campus.²⁹ Each of the trees was identified, measured, and evaluated by a certified arborist for its health and structure. Of the 177 inventoried trees, five are native species protected by the City of Los Angeles Tree Protection Ordinance and 172 trees meet the City's criteria for 'significant trees'. Trees would be preserved to the extent feasible; however, some may need to be removed due to poor health, safety issues or to accommodate new buildings and utilities. Any tree removal activities would follow the procedure outlined in the District's Tree Trimming and Removal Procedure. Existing trees deemed appropriate to save would be protected in place throughout construction, with attempts made to preserve as many existing trees as possible. New canopy and accent trees would be installed to increase canopy coverage and provide shade and interest throughout the Campus. Proposed trees would be climatically appropriate and located to enhance new buildings and site features.

3.2.4 Construction Phasing and Equipment

Construction is planned to start in the fourth quarter of 2021 (Q4-2021) and be completed by Q3-2026, lasting approximately 60 months. Construction is expected to occur over two 30-month periods. Table 4 summarizes the anticipated construction equipment needed for implementation of the proposed Project and Table 6 in Section III, Air Quality, provides further details regarding construction equipment, phasing, and construction haul trips.

²⁸ State of California. Adopted 2009 / updated 2015. Model Water Efficient Landscape Ordinance. 2009 ordinance available at: <https://water.ca.gov/legacyfiles/wateruseefficiency/docs/MWEL09-10-09.pdf> 2015; update available at: <https://water.ca.gov/legacyfiles/wateruseefficiency/landscapeordinance/docs/2015%20MWEL0%20Guidance%20for%20Local%20Agencies.pdf>

²⁹ Carlberg Associates, Tree Inventory Report, Kennedy High School, February 2, 2018.

3. Project Description

**Table 4
Construction Equipment and Schedule Summary**

Construction Phase	Equipment			Schedule	
	Equipment Type	Quantity	Daily Usage Hours	Start Date	Finish Date
PHASE 1					
Demolition	Excavator	1	14	11/1/21	2/1/22
	Tractors/Loaders/ Backhoes	1	14		
	Skid Steer Loader (Bobcat)	1	14		
	Crushing Equipment	1	14		
	Air Compressor (Jack Hammers)	2	14		
Site Preparation	Excavator	1	14	2/1/22	5/1/22
	Plate Compactor	1	14		
	Tractors/Loaders/ Backhoes	1	14		
	Skid Steer Loader (Skip Loader)	1	14		
	Roller	2	14		
	Trencher	1	14		
Building Construction (Remodeling and New Construction)	Bore / Drill Rig (Impact Pile Driver, Sonic Pile Driver, Crane-Mounted Auger Drill, or Crane-Suspended Downhole Vibrator)	1	14	5/1/22	5/1/24
	Concrete Pump Truck	1	14		
	Crane	1	14		
	Forklifts	1	14		
	Tractors/Loaders/ Backhoes	1	14		
	Air Compressor (Jack Hammers)	2	14		
PHASE 2					
Demolition	Excavator	1	14	5/1/24	8/1/24
	Tractors/Loaders/ Backhoes	1	14		
	Skid Steer Loader (Bobcat)	1	14		
	Crushing Equipment	1	14		
	Air Compressor (Jack Hammers)	2	14		



3. Project Description

**Table 4
Construction Equipment and Schedule Summary**

Construction Phase	Equipment			Schedule	
	Equipment Type	Quantity	Daily Usage Hours	Start Date	Finish Date
Site Preparation	Excavator	1	14	8/1/24	11/1/24
	Plate Compactor	1	14		
	Tractors/Loaders/Backhoes	1	14		
	Skid Steer Loader (Skip Loader)	1	14		
	Roller	2	14		
	Trencher	1	14		
Building Construction (Remodeling)	Bore / Drill Rig (Impact Pile Driver, Sonic Pile Driver, Crane-Mounted Auger Drill, or Crane-Suspended Downhole Vibrator)	1	14	11/1/24	8/1/26
	Concrete Pump Truck	1	14		
	Crane	1	14		
	Forklifts	1	14		
	Tractors/Loaders/Backhoes	1	14		
	Air Compressor (Jack Hammers)	2	14		
Paving	Skid Steer Loader (Skip Loader)	2	14	8/1/26	10/31/26
	Roller	1	14		
	Paver	1	14		

Notes: See Appendix B for details.

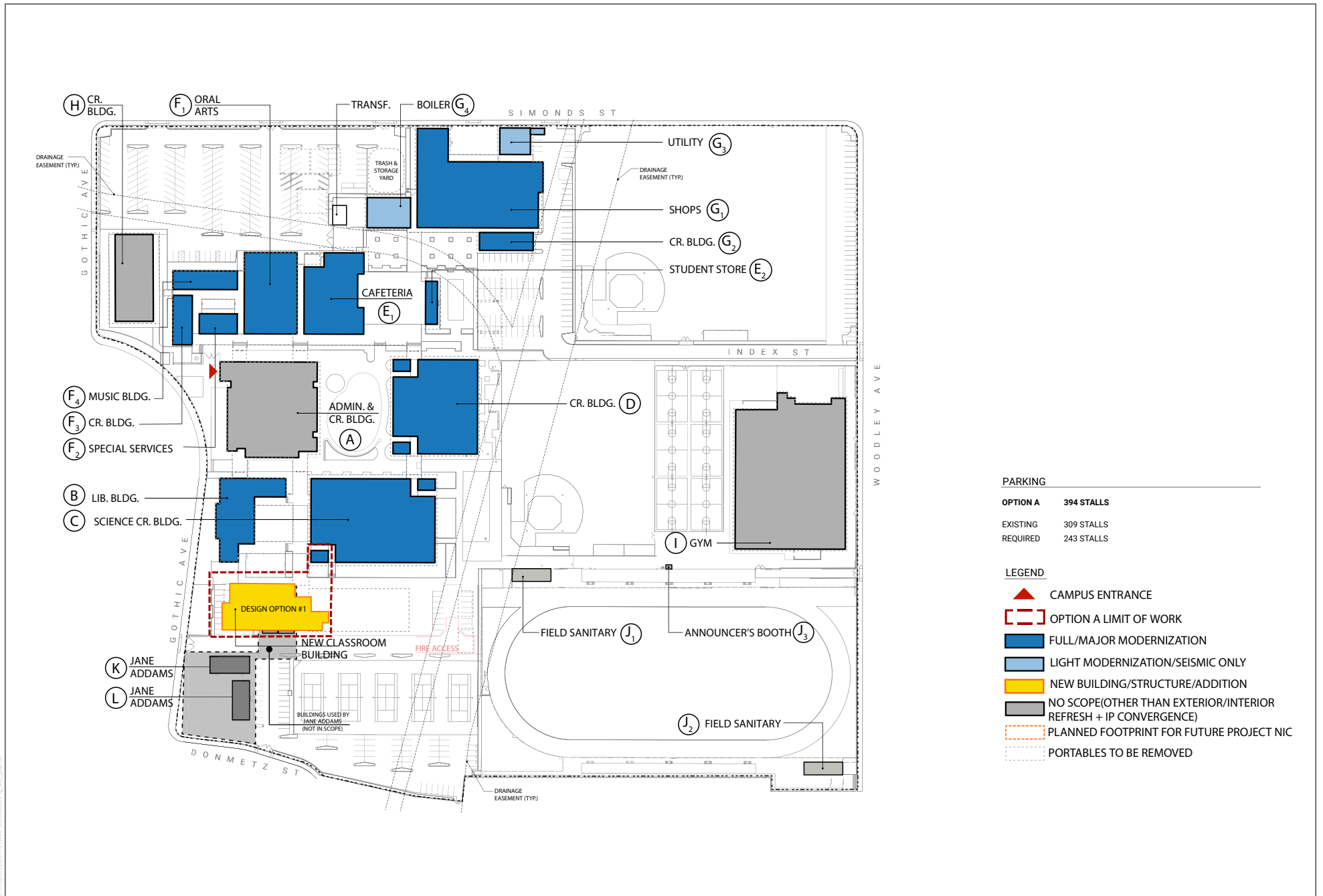
Due to active school operation during the construction phase, less than 50% of the school site would be disturbed at any one time. An average of 50 workers would be on site when students are present and a maximum of 150 workers would be on site during peak construction periods (i.e., during summer break).

To the extent feasible, construction-related activities would be scheduled to occur during the daylight hours. Construction-related traffic and deliveries would be scheduled to avoid student pick-up, drop-off hours and during noise-sensitive times as coordinated with the school administration. Consistent with the City's Municipal Code, all non-emergency construction activities would occur Monday through Friday between 7:00am and 9:00pm, and between 8:00am and 6:00pm on Saturdays and national holidays. Construction would be prohibited on Sundays.

3. Project Description

Demolition activities would be managed and conducted by the District's Facilities Environmental Technical Unit (FETU) in accordance with the LAUSD's standard practices. FETU would be responsible for ensuring the safe removal of potential lead and asbestos containing materials and polychlorinated biphenyls (PCBs) that may be encountered during construction. LAUSD would ensure that all construction-related activities would be completed in accordance with applicable federal, state, and local regulations.





SOURCE: HMC Architects 2019

3. Project Description

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SOURCE: HMC Architects 2019

DUDEK

FIGURE 8A

New Classroom Building: Option 1 Perspective View

John F. Kennedy High School Comprehensive Modernization Project

3. Project Description

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3. Project Description

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SOURCE: HMC Architects 2019

DUDEK

FIGURE 8C

New Classroom Building: Option 1 Street View

John F. Kennedy High School Comprehensive Modernization Project

3. Project Description

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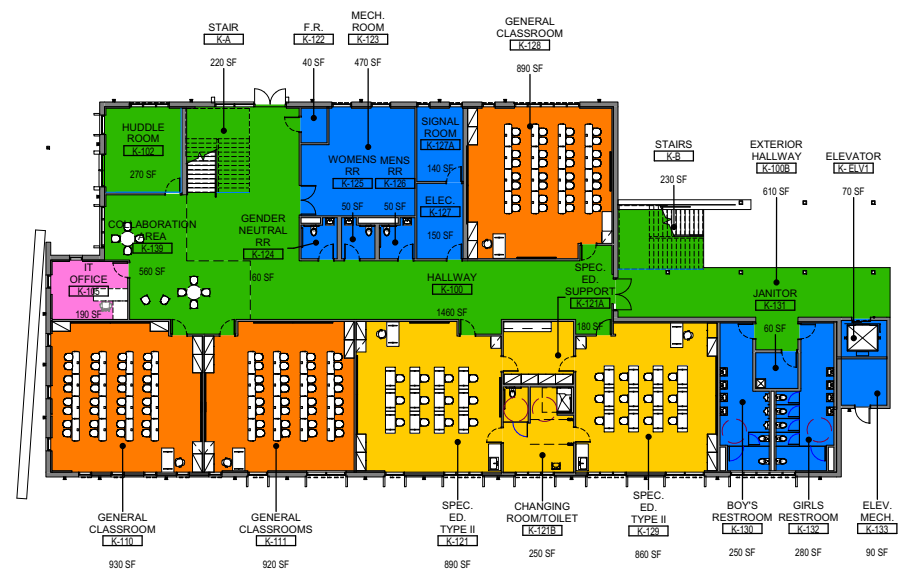


LEGEND

- ADMINISTRATION
- GENERAL CLASSROOM
- SPECIAL EDUCATION
- SCIENCE CLASSROOM
- BUILDING SUPPORT (RR, MEP, JAN., ETC.)
- CIRCULATION
- OTHER USES (FACULTY)



Second Floor



First Floor



SOURCE: HMC Architects 2019

3. Project Description

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4. Environmental Checklist and Analysis

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

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

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

DETERMINATION

On the basis of this initial evaluation:

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

4. Environmental Checklist and Analysis



Signature

Carlos A. Torres

Printed Name

10/24/19

Date

CEQA Officer for LAUSD

Title



4. Environmental Checklist and Analysis

Evaluation of Environmental Impacts:

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

4. Environmental Checklist and Analysis

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4. Environmental Checklist and Analysis

ENVIRONMENTAL IMPACTS

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

Explanation:

A Historic Resources Evaluation Report (HRER) prepared for the Project (included as Appendix A), a review of the California Highway system, the City of Los Angeles General Plan (General Plan), and the Granada Hills-Knollwood Community Plan serve as the basis for this aesthetics analysis. LAUSD has six SCs for minimizing impacts to aesthetic resources. Applicable SCs related to aesthetic resource impacts associated with the proposed Project are provided in the table below. Projects implemented under the SUP were determined in the Program EIR to result in less than significant impacts to aesthetics. The proposed Project would have a less than significant impact on aesthetics. No mitigation is required.

LAUSD Standard Conditions of Approval

SC-AE-1	<p>LAUSD shall review all designs to ensure that demolition of existing buildings or construction of new buildings on its historic campuses are designed to ensure compatibility with the existing campus. The School Design Guide shall be used as a reference to guide the design.</p> <p>School Design Guide¹ This document outlines measures for re-use rather than destruction of historical resources. It requires the consideration of architectural appearance/consistency and other aesthetic factors during the preliminary design review for a proposed school upgrade project. Architectural quality must consider compatibility with the surrounding community.</p>
SC-AE-2:	<p>LAUSD shall review all designs to ensure that methods from the current School Design Guide are incorporated throughout the planning, design, construction, and operation of the Project in order to limit aesthetic impacts.</p> <p>School Design Guide This document outlines measures to reduce aesthetic impacts around schools, such as shrubs and ground treatments that deter taggers, vandal-resistant and graffiti-resistant materials, painting, etc.</p>

4. Environmental Checklist and Analysis

SC-AE-3:	LAUSD shall assess the proposed project's consistency with the general character of the surrounding neighborhood, including, but not limited to, any proposed changes to the density, height, bulk, and setback of new buildings (including stadiums), additions, or renovations. Where feasible, LAUSD shall make appropriate design changes to reduce or eliminate viewshed obstruction and degradation of neighborhood character. Such design changes may include, but are not limited to, changes to the campus layout, height of buildings, landscaping, and/or the architectural style of buildings.
SC-AE-5	<p>LAUSD shall review all designs and test new lights following installation to ensure that adverse light trespass and glare impacts are avoided.</p> <p>School Design Guide</p> <p>This document outlines Illumination Criteria, requirements for outdoor lighting and measures to minimize and eliminate glare that may impact pedestrians, drivers and sports teams, and to avoid light trespass onto adjacent properties.</p>
SC-AE-6	<p>The International Dark-Sky Association (IDA) and the Illuminating Engineering Society (IES) Model Lighting Ordinance (MLO) shall be used as a guide for environmentally responsible outdoor lighting. The MLO has outdoor lighting standards that reduce glare, light trespass, and skyglow. The MLO uses lighting zones (LZ) 0 to 4, which allow the District to vary the lighting restrictions according to the sensitivity of the community. The MLO also incorporates the Backlight-Uplight-Glare (BUG) rating system for luminaires, which provides more effective control of unwanted light. The MLO establishes standards to:</p> <ul style="list-style-type: none"> • Limit the amount of light that can be used. • Minimize glare by controlling the amount of light that tends to create glare. • Minimize sky glow by controlling the amount of uplight. • Minimize the amount of off-site impacts or light trespass.

Source: LAUSD 2018.

Notes: 1 - The School Design Guide establishes a consistent level of functionality, quality and maintainability for all District school facilities. The document has design guidelines and criteria for the planning, design and technical development of new schools, modernizations, and building expansion projects; it includes by reference the Facilities Space Program, the Educational Specifications, the Guide Specifications, the Standard Technical Drawings of the District, and applicable codes, regulations and industry standards.

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

Less than Significant Impact. Vistas provide visual access or panoramic views to a large geographic area. The field of view from a vista location can be wide and extend into the distance.³⁰ Panoramic views are usually associated with vantage points looking out over a section of urban or natural landscape that provide a geographic orientation not commonly available. Examples of panoramic views might include an urban skyline, valley, mountain range, the ocean, or other water bodies.³¹ The City of Los Angeles General Plan Conservation Element has no designated scenic vistas; however, views of the ocean, striking or unusual natural terrain and unique urban historic features are considered natural resources, which should be protected.³²

The Project site lies over 17 miles away from the ocean and no scenic vistas pertaining to ocean views are visible from the Project site. The Project site and surrounding area are flat and developed with urban land uses. Although distant views of the Santa Susana Mountains to the north and the Verdugo Mountains to the east are visible from some vantage points on the Project site and from surrounding roadways, these views are obstructed by extensive streetscaping and building massing and would not be considered views of striking natural terrain. The Project site itself is considered eligible for the California Register of Historical Resources (CRHR) and for local designation as a historic district, as an outstanding embodiment

³⁰ *LA CEQA Thresholds Guide, Chapter A*. Report. 2006. <http://www.environmentla.org/programs/Thresholds/Complete Threshold Guide 2006.pdf>.

³¹ *LA CEQA Thresholds Guide, Chapter A*. Report. 2006. <http://www.environmentla.org/programs/Thresholds/Complete Threshold Guide 2006.pdf>.

³² City of Los Angeles Department of City Planning. September 2001. General Plan Conservation Element. Section 15: Land Form and Scenic Vistas. Available. Accessed, May 9, 2019. <https://planning.lacity.org/cwd/gnpln/consvelt.pdf>.



4. Environmental Checklist and Analysis

of the Mid-Century Modern/New Formalist architectural style (Appendix A). Given this, the Project site would be considered a unique urban historic feature under the City of Los Angeles General Plan.²⁵ Specifically, views of the Santa Susana Mountains to the north and the Verdugo Mountains to the east through the Project site are predominantly obscured by the existing Kennedy HS buildings and associated infrastructure, while views of the onsite existing historic resources are largely obscured by streetscaping and ornamental street trees along Donmetz Street and Gothic Avenue.

Project development would not result in the demolition of any buildings that are considered historic resources and would not result in any construction that would further obscure existing views of these historic resources or of the surrounding mountains. Instead, the Project would predominantly include the interior renovation of existing buildings, implementation of which would not result in a significant impact to scenic vistas. A single new classroom building would be constructed on a southern portion of the Campus; however, the new two-story, 20,581-square-foot building would be of the same scale and height as the adjacent Science Building and would not inhibit views of the onsite historic buildings from the public right-of-way or of the Santa Susana and Verdugo Mountains beyond that of existing conditions.

Additionally, 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 site design and construction for protection of unique scenic features and designated scenic vistas, per SC-AE-1, SC-AE-2, and SC-AE-3.³³ Given this, a less than significant impact to scenic vistas would occur. No mitigation or further study is required.

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

No Impact. The nearest designated state scenic highway to the site is the Angeles Crest Highway/State Route 2 (SR-2) about 17 miles southeast of the Project site.³⁴ California Interstate 210 (I-210), which lies approximately 2.6 miles north of the Project site is an Eligible State Scenic Highway (not officially designated). The proposed structures associated with the Project would not be visible from any designated state scenic highway, due to intervening distance, topography, and structures. No impact to scenic resources within a state scenic highway would occur. No mitigation or further study is required.

c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage points.) If the Project is in an urbanized area, would the Project conflict with applicable zoning and other regulations governing scenic quality?

Less than Significant Impact. The proposed Project could substantially degrade the existing visual character or quality of the public views of the Project site if the planned improvements would include any buildings or

³³ *LA CEQA Thresholds Guide, Chapter A*. Report. 2006. [http://www.environmentla.org/programs/Thresholds/Complete Threshold Guide 2006.pdf](http://www.environmentla.org/programs/Thresholds/Complete%20Threshold%20Guide%202006.pdf).

³⁴ California Department of Transportation (Caltrans). 2011. California Scenic Highway Mapping System. Accessed, May 9, 2019. http://www.dot.ca.gov/hq/LandArch/16_livability/scenic_highways/

4. Environmental Checklist and Analysis

infrastructure that would be incompatible with the visual setting (e.g. by casting significant shadow, incorporating incompatible architectural elements, etc.).

Urban development comprising one- and two-story buildings, large paved roadways, overhead utility infrastructure, and ornamental street trees and vegetation characterize the visual character of the project site and the surrounding area. The proposed Project would include 149,630 square feet of interior renovations, 25,530 square feet of demolition and the construction of a single, new 20,581-square-foot classroom building. The interior renovations and onsite demolition would not substantially degrade the existing visual character or quality of public views of the site and its surroundings. Furthermore, the proposed new classroom building would be located on the southwestern portion of the Campus, which is nestled between the Kennedy HS football field to the east, the Kennedy HS tennis courts to the south, and street trees along Donmetz Street and Gothic Avenue to the west. Due to these intervening components, the proposed location of the new classroom building is highly obscured from public viewpoints and, as such, construction of the classroom building would not substantially degrade the existing visual character or quality of public views of the site and its surroundings when compared to existing conditions. Furthermore, as per SC-AE-1; SC-AE-2; and SC-AE-3, the proposed classroom building would be designed to be visually compatible with the other Campus buildings, and, as such, would be highly visually compatible with the Project site and its surroundings when compared to the low visual quality afforded by the existing portable classrooms under existing conditions.

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 under existing conditions, as the new classroom building would be of the same scale and height as the adjacent Science Building and would not cause shadows to extend off-site in such a manner as to significantly impact nearby sensitive residential uses as the proposed site is buffered by tennis courts and a parking lot to the south. Existing structures proposed for remodel would not involve changes in height or massing that would result in a significant increase in shadow cast by Kennedy HS. Given this, there would be no new shade impacts to sensitive uses on the site. No significant impacts from shadows would occur as a result of the Project.

With implementation of SC-AE-1, SC-AE-2 and SC-AE-3, impacts to the visual character or quality of the site and its surroundings would be less than significant. No mitigation or further study is required.

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

Less than Significant Impact. The two major causes of light pollution are glare and light trespass/spill. Light trespass is caused by misdirected light that illuminates areas outside the area intended to be lit. Glare occurs when a bright object or reflective material casts excessive and uncontrolled brightness on sensitive receptors or nearby land uses. Glare may occur in many instances including oncoming vehicle headlights, an unshielded light bulb, or sunlight reflecting off building materials such as glass and steel.



4. Environmental Checklist and Analysis

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

Per SC-AE-5 and SC-AE-6, nighttime illumination at the Project site would be designed, arranged, directed, or shielded in accordance with existing state and local applicable regulations and guidelines for school operations, including the International Dark-Sky Association (IDA) and the Illuminating Engineering Society (IES) Model Lighting Ordinance. Adherence to the applicable guidelines and regulations for school site lighting would avoid excess illumination and light spillover to adjacent land uses. Additionally, the location of the proposed new 20,581-square-foot classroom building would be predominantly obscured by existing infrastructure and vegetation as described above in Section I(c), and the building would be constructed primarily of non-reflective building materials (such as brick and stucco) so as to be compatible with the existing buildings on Campus. As such, the construction of the new classroom building would not create a new source of substantial light or glare that would adversely affect day or nighttime views in the Project area.

Additionally, all SUP projects included under the Program EIR were determined to have a less than significant impact regarding the creation of new sources of light and glare with implementation of SC-AE-1 through SC-AE-6.^{35,36}

Given the above, the proposed Project would not create a new source of substantial light or glare, and would not adversely affect day or nighttime views in the area. Impacts would be less than significant. No mitigation or further study is required.

³⁵ *School Upgrade Program EIR*. Report. 2015. Accessed September 17, 2018. <http://achieve.lausd.net/ceqa>.

³⁶ *School Upgrade Program EIR*. Report. 2015. Accessed September 17, 2018. <http://achieve.lausd.net/ceqa>.

4. Environmental Checklist and Analysis

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

Explanation:

Information for the analyses in this section was taken from a review of the Department of Conservation's (DOC) Farmland Mapping and Monitoring program (FMMP), the United States Department of Agriculture's Forest Service, and the General Plan. The Program EIR does not include any SCs for minimizing impacts to agricultural and forestry resources. Projects implemented under the SUP were determined in the Program EIR to result in less than significant impacts to agriculture and forestry resources. The proposed Project would have a less than significant impact on agricultural and forest resources. No mitigation is required.

- 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?**

Less than Significant Impact. The Project site is classified as Urban and Built-Up Land by the DOC FMMP and has been developed as such since 1971. Planned improvements to the Campus would involve 23,530 square feet of demolition, 149,630 square feet of interior building remodeling and the addition of a single new, 20,581-



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square-foot building. All proposed improvements would take place on the Project site and no surrounding farmland would be acquired and resultantly converted to non-agricultural uses during Project implementation.

There is a single 9-acre parcel of Unique Farmland immediately northeast of the Project site, across Simonds Street. Unique Farmland is defined by the DOC as “farmland of lesser quality soils used for the production of the state's leading agricultural crops. This land is usually irrigated, but may include non-irrigated orchards or vineyards as found in some climatic zones in California. Land must have been cropped at some time during the four years prior to the mapping date.³⁷ The parcel of Unique Farmland would not be converted to non-agricultural uses as a result of Project implementation, and, as such, the Project would not result in the conversion of farmland to non-agricultural uses. Impacts would be less than significant. No mitigation or further study is required.

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

No Impact. The Project site is classified as Urban and Built-Up Land by the DOC. As stated above, the Project site is not located within an area zoned for agricultural use. Additionally, the Project site is not committed to a Williamson Act Contract.³⁸ Given this, the proposed Project would not conflict with existing zoning for agricultural use or with a Williamson Act contract and no impact would occur. No mitigation or further study is required.

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

No Impact. The Project site is classified as Urban and Built-Up Land by the DOC. According to the City's General Plan, the only remaining conifer and big tree forestlands within the immediate vicinity of the City are located outside out the City's boundary in the Angeles National Forest.³⁹ The Project site lies approximately 3.5 miles south of the Angeles National Forest at its closest point and there are no designated forest land, timberland or Timberland Production zones on or near the Project site.⁴⁰ Given this, Project implementation would not conflict with existing zoning for, or cause rezoning of, forest land, timberland or timberland zoned Timberland Production and no impact would occur. No mitigation or further study is required.

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

No Impact. The Project site is classified as Urban and Built-Up Land by the DOC. As stated above, and according to the City's General Plan, the only remaining conifer and big tree forestlands within the immediate vicinity of the City are located outside out the City's boundary in the Angeles National Forest. The Project site lies approximately 3.5 miles south of the Angeles National Forest at its closest point and there are no designated

³⁷ DOC (California Department of Conservation). 2016. FMMP California Important Farmland Finder. Accessed, May 9, 2019. <https://maps.conservation.ca.gov/DLRP/CIFF/>

³⁸ DOC (California Department of Conservation). 2017. Williamson Act Maps. Accessed, May 9, 2019. <ftp://ftp.consrv.ca.gov/pub/dlrp/wa/2016%20Statewide%20Map/>.

³⁹ City of Los Angeles. 2001. City of Los Angeles General Plan Conservation Element. Section 10. Accessed, May 10, 2019. <https://planning.lacity.org/cwd/gnlpln/consvelt.pdf>.

⁴⁰ United States Department of Agriculture Forest Service. 2005. Angeles National Forest Final Land Management Plan map. Accessed, May 9, 2019. https://www.fs.usda.gov/Internet/FSE_MEDIA/stelprdb5311720.pdf.

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forest land, timberland or Timberland Production zones on or near the Project site. Given this, Project implementation would not result in the loss of forest land or conversion of forest land to non-forest use and no impact would occur. No mitigation or further study is required.

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

Less than Significant Impact. Planned improvements to the Campus would involve 23,530 square feet of demolition, 149,630 square feet of interior building remodeling, and the addition of a single new, 20,581-square-foot building. All proposed improvements would take place on the Project site and no surrounding farmland would be acquired and resultantly converted to non-agricultural uses during Project implementation. There is a single 9-acre parcel of Unique Farmland immediately northeast of the Project site, across Simonds Street. This parcel of Unique Farmland would not be converted to non-agricultural uses as a result of Project implementation. The Project site is classified as Urban and Built-Up Land by the DOC. According to the City's General Plan, the only remaining conifer and big tree forestlands within the immediate vicinity of the City are located outside out the City's boundary in the Angeles National Forest.⁴¹ The Project site lies approximately 3.5 miles south of the Angeles National Forest at its closest point and there are no designated forest land, timberland or Timberland Production zones on or near the Project site.⁴² Given the above, Project implementation would have a less than significant impact on agricultural and forest resources. No mitigation or further study is required.

⁴¹ City of Los Angeles. 2001. City of Los Angeles General Plan Conservation Element. Section 10. Accessed, May 10, 2019. <https://planning.lacity.org/cwd/gnlpln/consvelt.pdf>.

⁴² United States Department of Agriculture Forest Service. 2005. Angeles National Forest Final Land Management Plan map. Accessed, May 9, 2019. https://www.fs.usda.gov/Internet/FSE_MEDIA/stelprdb5311720.pdf.



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

Explanation:

The analyses in this section are supported by estimations generated by the California Emissions Estimator Model (CalEEMod; Appendix B), as well as by information taken from the following sources: the California Department of Transportation (Caltrans); the California Air Resources Board (CARB); the United States Environmental Protection Agency (EPA); the Office of Environmental Health Hazard Assessment (OEHHA); the Southern California Association of Governments (SCAG); and, the South Coast Air Quality Management District (SCAQMD).

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

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

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	<ul style="list-style-type: none"> Place stockpiled soil on polyethylene sheeting and cover with similar material. Place stockpiled soil in areas shielded from prevailing winds.
SC-AQ-4	<p>LAUSD shall analyze air quality impacts:</p> <p>If site-specific review or monitoring data of a school construction project identifies potentially significant adverse regional and localized construction air quality impacts, then LAUSD shall implement all feasible measures to reduce air emissions below the South Coast Air Quality Management District's (SCAQMD) regional and localized significance thresholds.</p> <p>Construction bid contracts shall include protocols that reduce construction emissions during high-emission construction phases from vehicles and other fuel driven construction engines, activities that generate fugitive dust, and surface coating operations. The Construction Contractor shall be responsible for documenting compliance with the identified protocols. Specific air emissions reduction protocols include, but are not limited to, the following:</p> <p>Exhaust Emissions</p> <ul style="list-style-type: none"> Schedule construction activities that affect traffic flow to off-peak hours (e.g. between 10:00 AM and 3:00 PM). Consolidate truck deliveries and limit the number of haul trips per day. Route construction trucks off congested streets, as permitted by local jurisdiction haul routes. Employ high-pressure fuel injection systems or engine timing retardation. Use ultra-low sulfur diesel fuel, containing 15 ppm sulfur or less (ULSD) in all diesel construction equipment. Use construction equipment rated by the United States Environmental Protection Agency as having at least Tier 3 (model year 2006 or newer) or Tier 4 (model year 2008 or newer) emissions limits for engines between 50 and 750 horsepower. Restrict non-essential diesel engine idle time, to not more than five consecutive minutes. Use electrical power rather than internal combustion engine power generators. Use electric or alternatively fueled equipment, as feasible. Use construction equipment with the minimum practical engine size. Use low-emission on-road construction fleet vehicles. Ensure construction equipment is properly serviced and maintained to the manufacturer's standards. <p>Fugitive Dust</p> <ul style="list-style-type: none"> Apply non-toxic soil stabilizers to manufacturer's specifications to all inactive construction areas (previously graded areas inactive for 10 days or more). Replace ground cover in disturbed areas as quickly as possible. Sweep streets at the end of the day if visible soil material is carried onto adjacent public paved roads (recommend water sweepers with reclaimed water). Install wheel washers where vehicles enter and exit unpaved roads onto paved roads, or wash off trucks and any equipment leaving the site each trip. Pave unimproved construction roads that have a traffic volume of more than 50 daily trips by construction equipment, and/or 150 daily trips for a vehicles. Pave all unimproved construction access roads for at least 100 feet from the main road to the Project site. Enclose, cover, water twice daily, or apply non-toxic soil binders according to manufacturer's specifications to exposed piles (i.e., gravel, dirt, and sand) with a 5% or greater silt content. Suspend all excavating and grading operations when wind speeds (as instantaneous gusts) exceed 25 mph. Water disturbed areas of the active construction and unpaved road surfaces at least three times daily, except during periods of rainfall. Limit traffic speeds on unpaved roads to 15 mph or less.



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	<ul style="list-style-type: none"> • Prohibit fugitive dust activities on days where violations of the ambient air quality standard have been forecast by SCAQMD. • Tarp and/or maintain a minimum of 24 inches of freeboard on trucks hauling dirt, sand, soil, or other loose materials. • Limit the amount of daily soil and/or demolition debris loaded and hauled per day. <p>General Construction</p> <ul style="list-style-type: none"> • Use ultra-low VOC or zero-VOC surface coatings. • Phase construction activities to minimize maximum daily emissions. • Configure construction parking to minimize traffic interference. • Provide temporary traffic control during construction activities to improve traffic flow (e.g., flag person). • Prepare and implement a trip reduction plan for construction employees. • Implement a shuttle service to and from retail services and food establishments during lunch hours. • Increase distance between emission sources to reduce near-field emission impacts.
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a) Conflict with or obstruct implementation of the applicable air quality plan?

Less than Significant Impact. The proposed Project site is located within the South Coast Air Basin (SCAB), which includes the non-desert portions of Los Angeles, Riverside, and San Bernardino Counties, and all of Orange County, and is within the jurisdictional boundaries of the SCAQMD.

The SCAQMD administers the Air Quality Management Plan (AQMP) for the SCAB, which is a comprehensive document outlining an air pollution control program for attaining all California Ambient Air Quality Standards (CAAQS) and National Ambient Air Quality Standards (NAAQS). The most recent adopted AQMP is the 2016 AQMP, which was adopted by the SCAQMD Governing Board in March 2017.⁴³ The 2016 AQMP represents a new approach, focusing on available, proven, and cost-effective alternatives to traditional strategies while seeking to achieve multiple goals in partnership with other entities promoting reductions in greenhouse gases (GHGs) and toxic risk, as well as efficiencies in energy use, transportation, and goods movement.³⁷

The purpose of a consistency finding is to determine if a Project is inconsistent with the assumptions and objectives of the regional air quality plans, and, thus, if it would interfere with the region's ability to comply with federal and state air quality standards. The SCAQMD has established criteria for determining consistency with the currently applicable AQMP in Chapter 12, Sections 12.2 and 12.3, in the SCAQMD CEQA Air Quality Handbook. The criteria are as follows.⁴⁴

- **Consistency Criterion No. 1:** Whether the Project would result in an increase in the frequency or severity of existing air quality violations, cause or contribute to new violations, or delay timely attainment of the ambient air quality standards or interim emission reductions in the AQMP.

⁴³ SCAQMD (South Coast Air Quality Management District). 2017. Final 2016 Air Quality Management Plan. March 16, 2017. Accessed October 2017. <http://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2016-air-quality-management-plan/final-2016-aqmp/final2016aqmp.pdf?sfvrsn=15>.

⁴⁴ SCAQMD (South Coast Air Quality Management District). 1993. CEQA Air Quality Handbook.

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- **Consistency Criterion No. 2:** Whether the Project would exceed the assumptions in the AQMP or increments based on the year of Project buildout and phase.

To address the first criterion regarding the proposed Project's potential to result in an increase in the frequency or severity of existing air quality violations, cause or contribute to new violations, or delay timely attainment of the ambient air quality standards or interim emission reductions in the AQMP, Project-generated criteria air pollutant emissions were estimated and analyzed for significance and are addressed under Section III(b). Detailed results of this analysis are included in Appendix B. As presented in Section III(b), construction and operation of the proposed Project would not generate criteria air pollutant emissions that exceed the SCAQMD's thresholds, and it would therefore be consistent with Criterion No. 1.

The second criterion regarding the Project's potential to exceed the assumptions in the AQMP or increments based on the year of Project buildout and phase is primarily assessed by determining consistency between the Project's land use designations and potential to generate population growth. In general, Projects are considered consistent with, and would not conflict with or obstruct implementation of, the AQMP if the growth in socioeconomic factors is consistent with the underlying regional plans used to develop the AQMP (per Consistency Criterion No. 2 of the SCAQMD CEQA Air Quality Handbook). The SCAQMD primarily uses demographic growth forecasts for various socioeconomic categories (e.g., population, housing, employment by industry) developed by SCAG for its Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) (SCAG 2016), which is based on general plans for cities and counties in the SCAB, for the development of the AQMP⁴⁵ emissions inventory.⁴⁶ The SCAG 2016 RTP/SCS, and associated Regional Growth Forecast, are generally consistent with the local plans; therefore, the 2016 AQMP is generally consistent with local government plans.⁴⁷

As discussed in Section 2.5 of this IS/MND, the proposed Project site has a General Plan Land Use Designation of "Public Facilities" and is zoned as PF-1. The "PF" zone allows for construction/alteration/enlargement of structures on site for secondary schools. The proposed uses for the Project site are consistent with the existing land use designations, and no changes in land use designations would be required. LAUSD proposes to complete the Comprehensive Modernization Project at Kennedy HS to provide facilities that are safe, secure, and aligned with the instructional program. The proposed Project is designed to address the most critical physical concerns and essential safety issues at Kennedy HS, while providing renovations, modernizations, and reconfigurations to the facilities to support the educational program. The proposed Project includes seismic safety retrofits to many existing buildings and removal and

⁴⁵ SCAQMD. 2017. Final 2016 Air Quality Management Plan. March 16, 2017. Accessed October 2017. <http://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2016-air-quality-management-plan/final-2016-aqmp/final2016aqmp.pdf?sfvrsn=15>.

⁴⁶ Information necessary to produce the emission inventory for the SCAB is obtained from the SCAQMD and other governmental agencies, including the California Air Resources Board, Caltrans, and SCAG. Each of these agencies is responsible for collecting data (e.g., industry growth factors, socioeconomic projections, travel activity levels, emission factors, emission speciation profile, and emissions) and developing methodologies (e.g., model and demographic forecast improvements) required to generate a comprehensive emissions inventory. SCAG incorporates these data into its Travel Demand Model for estimating/projecting vehicle miles traveled and driving speeds. SCAG's socioeconomic and transportation activities projections in their 2016 RTP/SCS are integrated in the 2016 AQMP (SCAQMD 2017).

⁴⁷ SCAG (Southern California Association of Governments). 2016. 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy. Adopted April 7, 2016. Accessed March 2017. <http://scagrtpsc.net/Pages/FINAL2016RTPSCS.aspx>.



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replacement of portable buildings with a new permanent classroom (resulting in a net decrease in building area), ADA improvements, and other maintenance and utility improvements. The proposed Project would not result in an increase in student enrollment or staffing at Kennedy HS, nor would it affect the SCAQMD demographic growth forecasts for various socioeconomic categories (e.g., population, housing, employment by industry) developed by the SCAG. Accordingly, the proposed Project is consistent with the SCAG RTP/SCS forecasts used in the SCAQMD AQMP development.

In summary, based on the considerations presented for the two criteria, impacts relating to the proposed Project's potential to conflict with or obstruct implementation of the applicable AQMP would be less than significant. No mitigation or further study is required.

b) Result in a cumulatively considerable net increase of any criteria pollutant for which the Project region is non-attainment under an applicable federal or state ambient air quality standard?

Less than Significant Impact. Air pollution is largely a cumulative impact. The nonattainment status of regional pollutants is a result of past and present development, and the SCAQMD develops and implements plans for future attainment of ambient air quality standards. Based on these considerations, project-level thresholds of significance for criteria pollutants are used in the determination of whether a project's individual emissions would have a cumulatively considerable contribution on air quality. If a project's emissions would exceed the SCAQMD significance thresholds, it would be considered to have a cumulatively considerable contribution. Conversely, projects that do not exceed the project-specific thresholds are generally not considered to be cumulatively significant.⁴⁸

A quantitative analysis was conducted to determine whether proposed construction activities would result in a cumulatively considerable net increase in emissions of criteria air pollutants for which the SCAB is designated as nonattainment under the NAAQS or CAAQS. Criteria air pollutants include ozone (O₃), nitrogen dioxide (NO₂), carbon monoxide (CO), sulfur dioxide (SO₂), particulate matter with an aerodynamic diameter less than or equal to 10 microns (PM₁₀), particulate matter with an aerodynamic diameter less than or equal to 2.5 microns (PM_{2.5}), and lead. Pollutants that are evaluated herein include volatile organic compounds (VOCs) and oxides of nitrogen (NO_x), which are important because they are precursors to O₃, as well as CO, sulfur oxides (SO_x), PM₁₀, and PM_{2.5}.

Regarding NAAQS and CAAQS attainment status,⁴⁹ the SCAB is designated as a nonattainment area for national and California O₃ and PM_{2.5} standards.⁵⁰ The SCAB is designated as a nonattainment area for California PM₁₀

⁴⁸ SCAQMD (South Coast Air Quality Management District). 2003. White Paper on Potential Control Strategies to Address Cumulative Impacts from Air Pollution. August 2003. [http://www.aqmd.gov/docs/default-source/Agendas/ Environmental-Justice/cumulative-impacts-working-group/cumulative-impacts-white-paper.pdf?sfvrsn=2](http://www.aqmd.gov/docs/default-source/Agendas/Environmental-Justice/cumulative-impacts-working-group/cumulative-impacts-white-paper.pdf?sfvrsn=2).

⁴⁹ An area is designated as in attainment when it is in compliance with the NAAQS and/or the CAAQS. The NAAQS and CAAQS are set by the Environmental Protection Agency (EPA) and California Air Resources Board (CARB), respectively, for the maximum level of a given air pollutant that can exist in the outdoor air without unacceptable effects on human health or the public welfare. Attainment = meets the standards; attainment/maintenance = achieve the standards after a nonattainment designation; nonattainment = does not meet the standards.

⁵⁰ CARB (California Air Resources Board). 2018. "Area Designation Maps/State and National." Last reviewed December 28, 2018. <http://www.arb.ca.gov/desig/adm/adm.htm>.
EPA (United States Environmental Protection Agency). 2016. "Health and Environmental Effects of Particulate Matter (PM)" Last updated July 1, 2016. <https://www.epa.gov/pm-pollution/health-and-environmental-effects-particulate-matter-pm>.

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standards; however, it is designated as an attainment area for national PM₁₀ standards. The SCAB nonattainment status of O₃, PM₁₀, and PM_{2.5} standards is the result of cumulative emissions from various sources of air pollutants and their precursors within the SCAB, including motor vehicles, off-road equipment, and commercial and industrial facilities. The SCAB is designated as an attainment area for national and California NO₂, CO, and SO₂ standards. Although the SCAB has been designated as partial nonattainment (Los Angeles County) for the federal rolling 3-month average lead standard, it is designated attainment for the state lead standard.⁵¹

Appendix G of the State CEQA Guidelines states that significance criteria established by the applicable air district may be relied upon to determine whether a project would have a significant impact on air quality. The SCAQMD has established Air Quality Significance Thresholds, as revised in March 2015, which set forth quantitative emissions significance thresholds below which a project would not have a significant impact on ambient air quality.⁵² The quantitative air quality analysis provided in this section (Section III) applies the SCAQMD thresholds presented in Table 5 to determine the potential for the Project to result in a significant impact under CEQA.

Table 5
SCAQMD Air Quality Significance Thresholds

Criteria Pollutants Mass Daily Thresholds		
Pollutant	Construction (Pounds per Day)	Operation (Pounds per Day)
VOC	75	55
NO _x	100	55
CO	550	550
SO _x	150	150
PM ₁₀	150	150
PM _{2.5}	55	55
Lead ^a	3	3
Toxic Air Contaminants (TACs) and Odor Thresholds		
TACs ^b (including carcinogens and noncarcinogens)	Maximum incremental cancer risk ≥ 10 in 1 million Cancer Burden > 0.5 excess cancer cases (in areas > 1 in 1 million) Chronic and Acute Hazard index ≥ 1.0 (Project increment)	
Odor	Project creates an odor nuisance pursuant to SCAQMD Rule 402	
<p>Source: SCAQMD 2015. SCAQMD = South Coast Air Quality Management District; VOC = volatile organic compound; NO_x = oxides of nitrogen; CO = carbon monoxide; SO_x = sulfur oxides; PM₁₀ = coarse particulate matter; PM_{2.5} = fine particulate matter; TAC = toxic air contaminant; NO₂ = nitrogen dioxide; ppm = parts per million; µg/m³ = micrograms per cubic meter.</p> <p>^a The phase-out of leaded gasoline started in 1976. Since gasoline no longer contains lead, the proposed Project is not anticipated to result in impacts related to lead; therefore, it is not discussed in this analysis.</p> <p>^b TACs include carcinogens and non-carcinogens.</p>		

⁵¹ Re-designation of the lead NAAQS designation to attainment for the Los Angeles County portion of the SCAB is expected based on current monitoring data. The phase out of leaded gasoline started in 1976. Since gasoline no longer contains lead, the Project is not anticipated to result in impacts related to lead; therefore, it is not discussed in this analysis.

⁵² SCAQMD. 2015. "SCAQMD Air Quality Significance Thresholds." Originally published in CEQA Air Quality Handbook, Table A9-11-A. Revised March 2015. <http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf?sfvrsn=2>



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A project would result in a substantial contribution to an existing air quality violation of the NAAQS or CAAQS for O₃, which is a nonattainment pollutant, if the project's construction or operational emissions would exceed the SCAQMD VOC or NO_x thresholds shown in Table 5. These emission-based thresholds for O₃ precursors are intended to serve as a surrogate for an "ozone significance threshold" (i.e., the potential for adverse O₃ impacts to occur) because O₃ itself is not emitted directly, and the effects of an individual project's emissions of O₃ precursors (VOCs and NO_x) on O₃ levels in ambient air cannot be determined through air quality models or other quantitative methods.

The following discussion quantitatively evaluates Project-generated emissions and impacts that would result from implementation of the proposed Project.

Construction Emissions

Proposed construction activities would result in the temporary addition of pollutants to the local airshed caused by on-site sources (i.e., off-road construction equipment, soil disturbance, and VOC off-gassing) and off-site sources (i.e., on-road haul trucks, vendor trucks, and worker vehicle trips). Construction emissions can vary substantially from day to day, depending on the level of activity; the specific type of operation; and, for dust, the prevailing weather conditions. Therefore, an increment of day-to-day variability exists.

The proposed Project would be constructed in two 30-month phases, occurring over a construction period of approximately 60 months. Emissions from each construction phase of the proposed Project were estimated using the CalEEMod version 2016.3.2. For emission estimation purposes, construction is assumed to begin in December of 2021 and conclude in September of 2026. A detailed depiction of expected construction schedules—including information regarding phasing, equipment used during each phase, trucks, and worker vehicles—is provided in Appendix B. In the event construction is started later than December 2021, the analysis performed represents the worst-case scenario for criteria air pollutant emissions because equipment and vehicle emission factors for later years would be slightly less due to more stringent standards for in-use off-road equipment and heavy-duty trucks, as well as fleet turnover replacing older equipment and vehicles in later years.

The construction equipment mix used for estimating the construction emissions of the proposed Project is shown in Table 6 for Phase 1 and Phase 2 construction. For this analysis, it was assumed that heavy construction equipment would operate 6 days a week during Project construction.

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**Table 6
Construction Scenario Assumptions**

Construction Phase	One-Way Vehicle Trips			Equipment			Schedule	
	Average Daily Worker Trips	Average Daily Vendor Truck Trips	Total Haul Truck Trips	Equipment Type	Quantity	Daily Usage Hours	Start Date	Finish Date
PHASE 1								
Demolition	15	0	26	Excavator	1	14	xxxxtt	2/1/22
				Tractors/Loaders/Backhoes	1	14		
				Skid Steer Loader (Bobcat)	1	14		
				Crushing Equipment	1	14		
				Air Compressor (Jack Hammers)	2	14		
Site Preparation	18	0	2,660	Excavator	1	14	2/1/22	5/1/22
				Plate Compactor	1	14		
				Tractors/Loaders/Backhoes	1	14		
				Skid Steer Loader (Skip Loader)	1	14		
				Roller	2	14		
				Trencher	1	14		
Building Construction (Remodeling and New Construction)	46	18	0	Bore / Drill Rig (Impact Pile Driver, Sonic Pile Driver, Crane-Mounted Auger Drill, or Crane-Suspended Downhole Vibrator)	1	14	5/1/22	5/1/24
				Concrete Pump Truck	1	14		
				Crane	1	14		
				Forklifts	1	14		
				Tractors/Loaders/Backhoes	1	14		
				Air Compressor (Jack Hammers)	2	14		



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**Table 6
Construction Scenario Assumptions**

Construction Phase	One-Way Vehicle Trips			Equipment			Schedule	
	Average Daily Worker Trips	Average Daily Vendor Truck Trips	Total Haul Truck Trips	Equipment Type	Quantity	Daily Usage Hours	Start Date	Finish Date
PHASE 2								
Demolition	16	0	90	Excavator	1	14	5/1/24	8/1/24
				Tractors/Loaders/Backhoes	1	14		
				Skid Steer Loader (Bobcat)	1	14		
				Crushing Equipment	1	14		
				Air Compressor (Jack Hammers)	2	14		
Site Preparation	16	0	1,384	Excavator	1	14	8/1/24	11/1/24
				Plate Compactor	1	14		
				Tractors/Loaders/Backhoes	1	14		
				Skid Steer Loader (Skip Loader)	1	14		
				Roller	2	14		
				Trencher	1	14		
Building Construction (Remodeling)	166	66	0	Bore / Drill Rig (Impact Pile Driver, Sonic Pile Driver, Crane-Mounted Auger Drill, or Crane-Suspended Downhole Vibrator)	1	14	11/1/24	8/1/26
				Concrete Pump Truck	1	14		
				Crane	1	14		
				Forklifts	1	14		
				Tractors/Loaders/Backhoes	1	14		
				Air Compressor (Jack Hammers)	2	14		

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**Table 6
Construction Scenario Assumptions**

Construction Phase	One-Way Vehicle Trips			Equipment			Schedule	
	Average Daily Worker Trips	Average Daily Vendor Truck Trips	Total Haul Truck Trips	Equipment Type	Quantity	Daily Usage Hours	Start Date	Finish Date
Paving	14	0	0	Skid Steer Loader (Skip Loader)	2	14	8/1/26	10/31/26
				Roller	1	14		
				Paver	1	14		

Notes: See Appendix B for details.

Internal combustion engines used by construction equipment, trucks, and worker vehicles would result in emissions of VOCs, NO_x, CO, PM₁₀, and PM_{2.5}. PM₁₀ and PM_{2.5} emissions would also be generated by entrained dust, which results from the exposure of earth surfaces to wind from the direct disturbance and movement of soil. It is anticipated that no fill material would be imported and that 56,595 cubic yards of material would be exported during construction. The proposed Project would be required to comply with SC-AQ-3, SC-AQ-4, and SCAQMD Rule 403 to control dust emissions during any dust-generating activities. Standard construction practices that would be employed to reduce fugitive dust emissions include watering of the active grading areas up to three times per day, depending on weather conditions. The application of asphalt pavement would also produce VOC emissions; however, the contractor is required to procure asphalt from a supplier in compliance with the requirements of SCAQMD's Rules 1108 (Cutback Asphalt) and/or 1108.1 (Emulsified Asphalt).

Estimated maximum daily construction criteria air pollutant emissions from all on-site and off-site emission sources is provided in Table 7.

**Table 7
Estimated Maximum Daily Construction Emissions**

Year	VOC	NO _x	CO	SO _x	PM ₁₀ ^a	PM _{2.5} ^a
	pounds per day					
2021 (Phase 1)	2.85	22.22	28.81	0.05	1.51	1.28
2022 (Phase 1)	5.81	60.58	54.97	0.13	4.07	2.81
2023 (Phase 1)	3.18	28.75	26.30	0.07	1.88	1.34
2024 (Maximum of Phase 1 and Phase 2)	5.50	49.53	53.33	0.14	4.84	2.66
2025 (Phase 2)	3.41	28.38	30.24	0.09	3.29	1.56
2026 (Phase 2)	4.45	36.41	43.41	0.11	3.79	1.92
Maximum Daily Emissions	5.81	60.58	54.97	0.14	4.84	2.81



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Table 7
Estimated Maximum Daily Construction Emissions

Year	VOC	NO _x	CO	SO _x	PM ₁₀ ^a	PM _{2.5} ^a
	pounds per day					
SCAQMD Threshold	75	100	550	150	150	55
Threshold exceeded?	No	No	No	No	No	No
Source: SCAQMD 2015. Notes: VOC = volatile organic compound; NO _x = oxides of nitrogen; CO = carbon monoxide; SO _x = sulfur oxides; PM ₁₀ = coarse particulate matter; PM _{2.5} = fine particulate matter; SCAQMD = South Coast Air Quality Management District. See Appendix B for detailed results. ^a These estimates reflect control of fugitive dust required by SCAQMD Rule 403 (SCAQMD 2005).						

As shown in Table 7, daily construction emissions would not exceed the SCAQMD significance thresholds for VOC, NO_x, CO, SO_x, PM₁₀, or PM_{2.5} during Project construction. Therefore, construction impacts of the proposed Project would be less than significant, and no mitigation measures are required.

Operational Emissions

As shown in Table 3 in Section 3.2.1, under the proposed Project, 106,525 square feet of existing buildings will remain unchanged, 149,630 square feet of buildings will be remodeled, 23,530 square feet of building will be demolished and a new 20,581 square feet classroom building will be constructed. The proposed Project will result in a net reduction of building square feet of 6,699 square feet. The 106,525 square feet of buildings that are not changed as a result of the Project are not included in the operational emission analysis as their pre- and post-Project associated air pollutant emissions are the same. As discussed previously, the proposed Project remodeling includes seismic safety retrofits, ADA improvements and other maintenance and utility improvements. These remodeling activities will not increase classroom or building occupancy capacities or uses. Therefore, the air pollutant emissions associated with the operation of these remodeled buildings are the same pre- and post-Project and are not considered in the operational emissions evaluation.

Operation of the proposed Project would produce VOC, NO_x, CO, SO_x, PM₁₀, and PM_{2.5} emissions associated with vehicular traffic, area sources (consumer products, architectural coatings, landscaping equipment), energy sources (natural gas, appliances, and space and water heating). To estimate the net emissions change as a result of the Project, CalEEMod was used to estimate daily emissions associated with the operation of the existing buildings proposed for demolition (23,530 square feet) and daily emissions associated with the operation of the new classroom building (20,581 square feet). CalEEMod default values were utilized for both the existing operation and the proposed Project based on Educational, High School land use. Emissions from energy sources include electricity and natural gas combustion for appliances and space and water heating.

Table 8 summarizes the average daily area, energy, and mobile emissions of criteria pollutants that would be generated by the development of the proposed Project and how the net change in emissions compare to the SCAQMD thresholds of significance. As shown, there is a net decrease in all criteria pollutants. This result is consistent with the net decrease in building square feet though the demolition of portable buildings and new classroom construction. The values shown are the maximum summer or winter daily emissions (i.e., foreseeable worst case) results from CalEEMod. Details of the emission calculations are provided in Appendix B.

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Table 8
Estimated Maximum Daily Operational Emissions

Emission Source	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
	(pounds per day)					
Proposed Project (New Classroom Building: 20,581 square feet)						
Area	0.61	<0.01	0.04	0.00	<0.01	<0.01
Energy	0.01	0.06	0.05	0.000	<0.01	<0.01
Mobile	0.04	1.88	5.86	0.03	2.43	0.67
Total	1.02	1.93	5.95	0.03	2.44	0.67
Existing Operation (Portable Facilities to be Demolished: 23,530 square feet)						
Area	0.57	<0.01	<0.01	0.00	<0.01	<0.01
Energy	0.01	0.07	0.06	0.00	0.01	0.01
Mobile	0.55	2.47	8.09	0.03	3.03	0.83
Total	1.13	2.54	8.15	0.03	3.03	0.83
Net Change in Emissions						
Area	0.03	0.00	0.03	0.00	0.00	0.00
Energy	0.00	-0.01	-0.01	0.00	0.00	0.00
Mobile	-0.15	-0.59	-2.22	-0.01	-0.59	-0.16
Total Net Change (Proposed Project – Existing Operation)	--0.11	-0.61	-2.20	-0.01	-0.59	-0.16
SCAQMD Threshold	55	55	550	150	150	55
Threshold Exceeded?	No	No	No	No	No	No
Source: SCAQMD 2015. Notes: VOC = volatile organic compound; NO _x = oxides of nitrogen; CO = carbon monoxide; SO _x = sulfur oxides; PM ₁₀ = coarse particulate matter; PM _{2.5} = fine particulate matter. Area sources = consumer product use, architectural coatings, and landscape maintenance equipment. Energy sources = natural gas. Mobile sources = motor vehicles. See Appendix B for detailed results. The values shown are the maximum summer or winter daily emissions results from CalEEMod.						

As shown in Table 8, the proposed Project would result in a net decrease in emissions and would not exceed the SCAQMD thresholds for VOC, NO_x, CO, SO_x, PM₁₀, or PM_{2.5}.

As previously discussed, the SCAB has been designated as a federal nonattainment area for O₃ and PM_{2.5}, and a state nonattainment area for O₃, PM₁₀, and PM_{2.5}. Construction and operational activities of the proposed Project would generate VOC and NO_x emissions (precursors to O₃) and emissions of PM₁₀ and PM_{2.5}. However, as indicated in Tables 7 and 8, Project-generated emissions would not exceed the SCAQMD emission-based significance thresholds for VOCs, NO_x, PM₁₀, or PM_{2.5}, and therefore the proposed Project would not cause a cumulatively significant impact.

Cumulative localized impacts associated with construction would potentially occur if a project were to be developed concurrently with another off-site project. Schedules for potential future projects near the Project area are currently unknown; therefore, potential impacts associated with two or more simultaneous project



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would be considered speculative.⁵³ However, future projects would be subject to CEQA and would require air quality analysis and, where necessary, mitigation. Criteria air pollutant emissions associated with construction activity of future projects would also be reduced through implementation of control measures required by the SCAQMD. Cumulative PM₁₀ and PM_{2.5} emissions would be reduced because all future projects would be subject to SCAQMD Rule 403 (Fugitive Dust), which sets forth general and specific requirements for all sites in the SCAQMD.

Therefore, the proposed Project would not result in a cumulatively considerable increase in emissions of nonattainment pollutants, and impacts would be less than significant during construction and operation. No mitigation or further study is required.

c) Expose sensitive receptors to substantial pollutant concentrations?

Less than Significant Impact. Localized impacts associated with Project construction and operations are assessed below and were determined to be less than significant.

Sensitive Receptors

Sensitive receptors are those individuals more susceptible to the effects of air pollution than the population at large. People most likely to be affected by air pollution include children, the elderly, and people with cardiovascular and chronic respiratory diseases. According to the SCAQMD, sensitive receptors include residences, schools, playgrounds, childcare centers, long-term healthcare facilities, rehabilitation centers, convalescent centers, and retirement homes.⁵⁸

The Project site is a school, and therefore, a sensitive receptor. The Project site is generally surrounded by single-family residential homes and is approximately 720 feet (0.14 mile) northeast of the SR-118 at its closest point. Directly north of the Project site is Simonds Street, followed by a 220-foot-wide LADWP electrical transmission line easement followed by single-family homes along Kalisher Street approximately 275 feet to the north of the site. Directly east of the Project site is Woodley Avenue, followed by single-family residential homes located approximately 100 feet east of the property boundary. Single-family residential homes are located directly west of the Project site across Gothic Avenue, approximately 60 feet east of the property boundary.

Localized Significance Thresholds

The SCAQMD recommends a localized significance threshold (LST) analysis to evaluate localized air quality impacts to sensitive receptors in the immediate vicinity of a project site as a result of construction activities. The impacts of the proposed project were analyzed using methods consistent with those in the SCAQMD's Final Localized Significance Threshold Methodology.⁵⁴ SCAQMD's Final Localized Significance Threshold Methodology provides thresholds based on a project site's location, size, and distance to the closest sensitive receptor. The proposed Project is located in Source-Receptor Area (SRA) 2 (Los Angeles), and the Project site is made up of the 27.4-acre school Campus; however, construction would be limited to only a portion of the site at

⁵³ The State CEQA Guidelines state that if a particular impact is too speculative for evaluation, the agency should note its conclusion and terminate discussion of the impact (14 CCR 15145).

⁵⁴ SCAQMD (South Coast Air Quality Management District). 2009. Final Localized Significance Threshold Methodology. June 2003; revised July 2008; Appendix C "Mass Rate LST Look-up Tables" revised October 2009. <http://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/final-lst-methodology-document.pdf?sfvrsn=2>.

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a time. Active construction is anticipated to occur on fewer than five acres of the school property at any one time. SCAQMD recommends selecting LST thresholds based on the expected area of active construction, to provide a representative analysis of the anticipated effects. Per SCAQMD’s Final Localized Significance Threshold Methodology, the LSTs are only applicable to NO_x, CO, PM₁₀, and PM_{2.5}, as these are the localized pollutants of concern.⁴³ The greatest on-site emissions of NO_x, CO, PM₁₀, and PM_{2.5} generated during construction was determined to occur during the building construction phases. CalEEMod is used to calculate the expected area of active construction for the Project, based on the type of construction and the equipment fleet that would be used.⁵⁵ Consistent with SCAQMD guidance, LST thresholds are selected based on the number of crawler tractors, graders, rubber tired dozers, and scrapers that are expected to be used during the most intensive construction activity. As shown in Table 6, one “tractor/loader/backhoe” is expected to be used during building construction (which would be the most intensive construction activity for the Project, in terms of air emissions). CalEEMod default values assume that during an 8-hour day, a tractor/loader/backhoe can disturb a maximum of 0.5 acres. The proposed Project construction schedule assumes a 14-hour day. Therefore, the maximum disturbed area is scaled, resulting in a maximum of 0.875 disturbed acres per day. The closest off-site sensitive receptors are single-family residential homes located directly west of the Project site across Gothic Avenue, approximately 60 feet east of the property boundary. As noted previously the Project site is a school, and as such, also a sensitive receptor. Therefore, in order to consider both on-site and off-site sensitive receptors, the shortest receptor distance available in the SCAQMD LST Methodology was assumed for this analysis, which is 25 meters (~82 feet). As such, the SCAQMD LST values for a construction area of 0.875 acres within SRA 2 and with a receptor distance of 25 meters were compared to emissions from the proposed Project.

Project construction activities would result in temporary sources of on-site criteria air pollutant emissions associated with construction equipment exhaust and dust-generating activities. Off-site emissions from trucks and worker vehicle trips are not included in the LST analysis because they occur off site. The maximum daily on-site emissions generated during construction of the proposed Project are presented in Table 9 and are compared to the SCAQMD localized significance criteria for SRA 2 to determine whether Project-generated on-site construction emissions would result in potential LST impacts.

Table 9
Construction Localized Significance Thresholds Analysis

Year	NO ₂	CO	PM ₁₀	PM _{2.5}
	pounds per day (on site)			
2021 (Phase 1)	22.10	28.19	1.29	1.22
2022 (Phase 1)	29.96	28.10	1.40	1.32
2023 (Phase 1)	27.37	24.34	1.24	1.17
2024 (Phase 1 and Phase 2)	25.36	28.06	1.11	1.04
2025 (Phase 2)	23.47	23.97	0.99	0.93
2026 (Phase 2)	23.47	23.97	0.99	0.93

⁵⁵ SCAQMD (South Coast Air Quality Management District). 2011. Fact Sheet for Applying CalEEMod to Localized Significance Thresholds. <http://www.aqmd.gov/docs/default-source/ccqa/handbook/localized-significance-thresholds/caleemod-guidance.pdf?sfvrsn=2>.



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Table 9
Construction Localized Significance Thresholds Analysis

Year	NO ₂	CO	PM ₁₀	PM _{2.5}
	pounds per day (on site)			
Maximum Daily On Site Emissions	29.96	28.19	1.40	1.32
<i>SCAQMD LST Criteria</i>	<i>98</i>	<i>529</i>	<i>3.8</i>	<i>2.9</i>
Threshold Exceeded?	No	No	No	No
Source: SCAQMD 2009. Notes: NO ₂ = nitrogen dioxide; CO = carbon monoxide; PM ₁₀ = particulate matter; PM _{2.5} = fine particulate matter; SCAQMD = South Coast Air Quality Management District; LST = localized significance threshold. See Appendix B for detailed results. Localized significance thresholds are shown for a 0.875-acre Project site and a distance of 25 meters (82 feet) to the nearest sensitive receptor.				

As shown in Table 9, proposed construction activities would not generate emissions in excess of site-specific LSTs; therefore, localized Project construction impacts would be less than significant. No mitigation is required.

CO Hotspots

Traffic-congested roadways and intersections have the potential to generate localized high levels of CO. Localized areas where ambient concentrations exceed federal and/or state standards for CO are termed CO “hotspots.” CO transport is extremely limited and disperses rapidly with distance from the source. Under certain extreme meteorological conditions, however, CO concentrations near a congested roadway or intersection may reach unhealthy levels, affecting sensitive receptors. Typically, high CO concentrations are associated with severely congested intersections operating at an unacceptable level of service (LOS) (LOS E or worse is unacceptable). Projects contributing to adverse traffic impacts may result in the formation of a CO hotspot. Additional analysis of CO hotspot impacts would be conducted if a project would result in a significant impact or contribute to an adverse traffic impact at a signalized intersection that would potentially subject sensitive receptors to CO hotspots.

The Code of Federal Regulations (CFR) Procedures for Determining Localized CO, PM₁₀, and PM_{2.5} Concentrations (hot-spot analysis), states that “CO, PM₁₀, and PM_{2.5} hot-spot analyses are not required to consider construction-related activities, which cause temporary increases in emissions. Each site which is affected by construction-related activities shall be considered separately, using established ‘Guideline’ methods. Temporary increases are defined as those which occur only during the construction phase and last five years or less at any individual site” (40 CFR 93.123(c)(5)). While project construction would involve on-road vehicle trips from trucks and workers during construction, construction activities are considered temporary. As a result, the proposed construction activities would not require a project-level construction hotspot analysis.

Projects contributing to adverse traffic impacts may result in the formation of CO hotspots. The proposed Project operations would not increase classroom or building occupancy capacities or uses and would not, therefore, result in substantial changes to the existing traffic rates and patterns (as explained in Section XVIII). Accordingly, the proposed Project would not generate traffic that would contribute to potential adverse traffic

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impacts that may result in the formation of CO hotspots. In addition, due to continued improvement in vehicular emissions at a rate faster than the rate of vehicle growth and/or congestion, the potential for CO hotspots in the SCAB is steadily decreasing. Based on these considerations, the proposed Project would result in a less than significant impact to air quality with regard to potential CO hotspots. No mitigation is required.

Toxic Air Contaminants

Toxic air contaminants (TACs) are defined as substances that may cause or contribute to an increase in deaths or in serious illness, or that may pose a present or potential hazard to human health. As discussed under the LST analysis, the nearest sensitive receptors are residences west of the Project site across Gothic Avenue.

Health effects from carcinogenic air toxics are usually described in terms of cancer risk. The SCAQMD recommends an incremental cancer risk threshold of 10 in 1 million. “Incremental cancer risk” is the net increased likelihood that a person continuously exposed to concentrations of TACs resulting from a project over a 9-, 30-, and 70-year exposure period will contract cancer based on the use of standard OEHHA risk-assessment methodology.⁵⁶ In addition, some TACs have non-carcinogenic effects. The SCAQMD recommends a Hazard Index of 1 or more for acute (short-term) and chronic (long-term) non-carcinogenic effects.⁵⁷ TACs that would potentially be emitted during construction activities associated with development of the proposed Project would be diesel particulate matter. Diesel particulate matter emissions would be emitted from heavy equipment operations and heavy-duty trucks. Heavy-duty construction equipment is subject to a California Air Resources Board (CARB) Airborne Toxics Control Measure for in-use diesel construction equipment to reduce diesel particulate emissions. As described for the LST analysis, PM₁₀ (representative of diesel particulate matter) exposure would be minimal. According to the OEHHA, health risk assessments (which determine the exposure of sensitive receptors to toxic emissions) should be based on a 30-year exposure period for the maximally exposed individual resident. However, such assessments should also be limited to the period/duration of activities associated with the project. The duration of the proposed construction activities would constitute a small percentage of the total 30-year exposure period. The construction period for the proposed Project would be approximately 60 months, after which construction-related TAC emissions would cease. Due to this relatively short period of exposure and minimal particulate emissions on site, TACs generated during construction would not be expected to result in concentrations causing significant health risks. Following completion of on-site construction activities, the proposed Project would not involve operational activities that would generate TAC emissions.

For the reasons described above, the Project would not result in substantial TAC exposure to sensitive receptors in the vicinity of the proposed Project, and impacts would be less than significant. No mitigation is required.

⁵⁶ OEHHA (Office of Environmental Health Hazard Assessment). 2015. Air Toxics Hot Spots Program Risk Assessment Guidelines – Guidance Manual for Preparation of Health Risk Assessments. Accessed February 2015. <https://oehha.ca.gov/air/crnrr/notice-adoption-air-toxics-hot-spots-program-guidance-manual-preparation-health-risk-0>.

⁵⁷ Non-cancer adverse health risks are measured against a hazard index, which is defined as the ratio of the predicted incremental exposure concentrations of the various non-carcinogens from the project to published reference exposure levels that can cause adverse health effects.



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Health Effects of Criteria Air Pollutants

Construction and operation of the proposed Project would generate criteria air pollutant emissions; however, the Project would not exceed the SCAQMD mass-emission thresholds.

Health effects associated with O₃ include respiratory symptoms, worsening of lung disease leading to premature death, and damage to lung tissue.⁵⁸ VOCs and NO_x are precursors to O₃, for which the SCAB is designated as nonattainment with respect to the NAAQS and CAAQS. Thus, existing O₃ levels in the SCAB are at unhealthy levels during certain periods. Because the proposed Project would not involve construction or operational activities that would result in O₃ precursor emissions (VOC or NO_x) in excess of the SCAQMD thresholds, the Project is not anticipated to substantially contribute to regional O₃ concentrations and the associated health impacts.

Exposure to NO₂ (which is a constituent of NO_x) can irritate the lungs, cause bronchitis and pneumonia, lower resistance to respiratory infections, and enhance allergic responses.⁴⁶ Project construction and operation would not exceed the SCAQMD NO_x threshold, and existing ambient NO₂ concentrations are below the NAAQS and CAAQS. Thus, implementation of the proposed Project is not expected to exceed the NO₂ standards or contribute to associated health effects.

Health effects associated with CO include chest pain in patients with heart disease, headache, light-headedness, and reduced mental alertness.⁴⁶ CO tends to be a localized impact associated with congested intersections. CO hotspots were discussed previously as a less than significant impact. Thus, the proposed Project's CO emissions would not contribute to the health effects associated with this pollutant.

Particulate matter exposure has been linked to a variety of problems, including premature death in people with heart or lung disease, nonfatal heart attacks, irregular heartbeat, aggravated asthma, decreased lung function, and increased respiratory symptoms such as irritation of the airways, coughing, or difficulty breathing.⁵⁹ The SCAB is designated as nonattainment for PM₁₀ under the CAAQS and nonattainment for PM_{2.5} under the NAAQS and CAAQS. Implementation of the proposed Project would not generate emissions of PM₁₀ or PM_{2.5} that would exceed the SCAQMD's thresholds. Accordingly, the proposed Project's PM₁₀ and PM_{2.5} emissions are not expected to cause any increase in related regional health effects for these pollutants. Impacts would be less than significant. No mitigation is required.

In summary, the proposed Project would not result in a potentially significant contribution to regional concentrations of non-attainment pollutants and would not result in a significant contribution to the adverse health effects associated with those pollutants. Impacts would be less than significant. No mitigation or further study is required.

⁵⁸ CARB (California Air Resources Board). 2019. "Common Air Pollutants." Accessed May 12, 2019. <https://ww2.arb.ca.gov/resources/common-air-pollutants>.

⁵⁹ EPA (United States Environmental Protection Agency). 2016. "Health and Environmental Effects of Particulate Matter (PM)" Last updated July 1, 2016. <https://www.epa.gov/pm-pollution/health-and-environmental-effects-particulate-matter-pm>.

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

Less than Significant Impact. The occurrence and severity of potential odor impacts depend on numerous factors. The nature, frequency, and intensity of the source; wind speed and direction; and the sensitivity of receiving location each contribute to the intensity of the impact. Although offensive odors seldom cause physical harm, they can be annoying, cause distress among the public, and generate citizen complaints.

During Project construction, exhaust from equipment may produce discernible odors typical of most construction sites. Potential odors produced during construction would be attributable to concentrations of unburned hydrocarbons from tailpipes of construction equipment. However, such odors would disperse rapidly from the Project site and generally occur at magnitudes that would not affect substantial numbers of people. Accordingly, impacts associated with odors during construction would be less than significant.

SCAQMD provides a list of land uses associated with odor concerns, which include agricultural uses, wastewater treatment plants, food-processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding.³⁸ The proposed Project includes operation of high school uses, which are not anticipated to generate odors and would not result in operation of the types of land uses listed in SCAQMD's screening criteria. For the reasons described above, project construction and operation would result in an odor impact that would be less than significant. No mitigation or further study is required.



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

Explanation:

The analyses in this section are supported by the Tree Inventory Report (Appendix C). LAUSD has five SCs for minimizing impacts to biological resources. Applicable SCs related to biological resources impacts associated with the proposed Project are provided in the table below. Projects implemented under the SUP were determined in the Program EIR to result in less than significant impacts to biological resources. The proposed Project would have a less than significant impact to biological resources.

LAUSD Standard Conditions of Approval

SC-BIO-1	<p>An LAUSD-qualified nesting bird Surveyor or Biologist shall identify plant and animal species and habitat within and near the project site. LAUSD will conduct a literature search, which shall consider a one-mile radius beyond the project construction site and shall be performed by a qualified nesting bird Surveyor or Biologist with knowledge of local biological conditions as well as the use and interpretation of the data sources identified below. Where appropriate, in the opinion of the Biologist, the literature search shall be supplemented with a site visit and/or aerial photo analysis. Resources and information that shall be investigated for each site should include, but not be limited to:</p> <ul style="list-style-type: none"> • United States Fish and Wildlife Service (USFWS) • National Marine Fisheries Services (NMFS)
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- California Department of Fish and Wildlife (CDFW)
- California Native Plant Society (CNPS)
- County and/or city planning or environmental offices for sensitive species, habitat, and/or heritage trees that may not exist on published databases.
- California Natural Diversity Data Base (CNDDDB) California Native Plant Society (CNPS) Rare Plant Inventory
- Local Audubon Society
- Los Angeles County Department of Regional Planning for information on Significant Ecological Areas
- California Digital Conservation Atlas for District-wide location of reserves, plan areas, and land trusts that may overlap with project sites.

Biological Resources Report

If a report is necessary and the LAUSD qualified nesting bird Surveyor or Biologist determines that a school construction project will affect an identified sensitive plant, animal, or habitat, a biological resources report shall be prepared. To provide a complete assessment of the flora and fauna within and adjacent to a site-specific project impact area, with particular emphasis on identifying endangered, threatened, sensitive, and locally unique species and sensitive habitats, the biological resources report shall include the following.

- Information on regional setting that is critical to the assessment of rare or unique resources.
- A thorough, recent floristic-based assessment of special status plants and natural communities, following the CDFW's Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities. CDFW recommends that floristic, alliance- and/or association-based mapping and vegetation impact assessments be conducted at the project site and neighboring vicinity. The Manual of California Vegetation (Sawyer et al.) should also be used to inform this mapping and assessment. Adjoining habitat areas should be included in this assessment where site activities could lead to direct or indirect impacts offsite. Habitat mapping at the alliance level will help establish baseline vegetation conditions.
- A current inventory of the biological resources associated with each habitat type onsite and within the area of potential effect. CDFW's California Natural Diversity Data Base (CNDDDB) should be contacted to obtain current information on any previously reported sensitive species and habitat, including Significant Natural Areas identified under Chapter 12 of the Fish and Game Code.
- An inventory of rare, threatened, and endangered, and other sensitive species onsite and within the area of potential effect. Species to be addressed should include all those identified in CEQA Guidelines Section 15380, including sensitive fish, wildlife, reptile, and amphibian species. Seasonal variations in use of the project area should also be addressed. Focused species-specific surveys, conducted at appropriate time of year and time of day when sensitive species are active or otherwise identifiable, are required. Acceptable species-specific survey procedures should be developed in consultation with the CDFW and USFWS.
- A discussion of the potential adverse impacts from light, noise, human activity, exotic species, and drainage. Drainage analysis should address project-related changes on drainage patterns on and downstream from the site; the volume, velocity, and frequency of existing and post-project surface flows; polluted runoff; soil erosion and/or sedimentation in streams and water bodies; and post-project fate of runoff from the project site.
- Discussions about direct and indirect project impacts on biological resources, including resources in nearby public lands, open space, adjacent natural habitats, wetland and riparian ecosystems, and any designated and/or proposed or existing reserve lands (e.g., preserve lands associated with a NCCP). Impacts on, and maintenance of, wildlife corridor/movement areas, including access to undisturbed habitats in adjacent areas.
- Mitigation measures for adverse project-related impacts to sensitive plants, animals, and habitats. Measures should emphasize avoidance and reduction of biological impacts. For unavoidable impacts, onsite habitat restoration or enhancement should be outlined. If onsite measures are not feasible or would not be biologically viable, offsite measures through habitat creation and/or acquisition and preservation in perpetuity should occur. This measure should address restrictions



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	<p>on access, proposed land dedications, monitoring and management programs, control of illegal dumping, water pollution, increased human intrusion, etc.</p> <ul style="list-style-type: none"> • Plans for restoration and vegetation shall be prepared by qualified nesting bird Surveyor or Biologist with expertise in southern California ecosystems and native plant vegetation techniques. Plans shall include, at a minimum: <ul style="list-style-type: none"> ○ Location of the mitigation site. ○ Plant species to be used, container sizes, and seeding rates. ○ Schematic depicting the mitigation area. ○ Planting schedule. ○ Irrigation method. ○ Measures to control exotic vegetation. ○ Specific success criteria. ○ Detailed monitoring program. ○ Contingency measures should the success criteria not be met. ○ Identification of the party responsible for meeting the success criteria and providing for conservation of the site in perpetuity. <p>LAUSD shall consult with the U.S. Army Corps of Engineers, USFWS and/or the CDFW and comply with any permit conditions or directives from those agencies regarding the protection, relocation, creation, and/or compensation of sensitive species and/or habitats.</p>
SC-BIO-2	<p>LAUSD shall protect sensitive wildlife species from harmful or disruptive exposure to light by shielding light sources, redirecting light sources, or using low intensity lighting. All exterior light fixtures shall be listed as dark sky compliant as required under SC-AE-6.</p>
SC-BIO-3	<p>LAUSD shall comply with the following specifications related to bird and bat nesting sites. Project activities (including, but not limited to, staging and disturbances to native and nonnative vegetation, structures, and substrates²) should occur outside of nesting season to avoid take of birds, bats, or their eggs.³</p> <p>Bird Surveys - Construction Demolition or Vegetation Removal in or adjacent to Native Habitat</p> <ul style="list-style-type: none"> • For construction projects occurring in or adjacent to native habitat, a qualified LAUSD nesting bird Surveyor or qualified Biologist (Surveyor/Biologist) may determine that additional surveys are required outside of the breeding and nesting season (February 1st through August 31st, beginning January 1st for raptors) to determine if protected birds occupy the area (e.g., project site is adjacent to areas with suitable habitat for Southwestern willow flycatcher). • If avoidance of the avian breeding season is not feasible, beginning 30 days prior to the initiation of the project activities, the Surveyor/Biologist with experience conducting nesting bird surveys shall conduct weekly bird surveys to detect protected native birds occurring in suitable nesting habitat that is to be disturbed and (as access to adjacent areas allows) any other such habitat within 300 feet of the disturbance area (within 500 feet for raptors). The surveys shall continue on a weekly basis with the last survey being conducted no more than three days prior to the initiation of project activities. In areas that contain suitable habitat for listed species, species-specific surveys shall be conducted by a qualified Biologist authorized by the regulatory agencies. • If a protected bird is observed, additional protocol-level surveys may be required to determine if the sighting was a transient individual or if the site is used as nesting habitat for that species. Project activities shall be delayed until there is a final determination. • If an active nest is located, project activities within 300 feet of the nest (within 500 feet for raptor nests), or as determined by the Surveyor/Biologist shall be delayed until the nest is vacated and juveniles have fledged and there is no evidence of a second attempt at nesting. Flagging, stakes, and/or construction fencing shall be used to demarcate the boundary of the 300- or 500-foot buffer between the project activities and the nest or tree. Project personnel, including all Construction Contractors working on site, shall be instructed on the sensitivity of the area. Protective measures shall be documented to show compliance with applicable State and Federal laws pertaining to the protection of birds.

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	<ul style="list-style-type: none"> • If the Surveyor/Biologist determines that a narrower buffer between the project activities and active nests is warranted, a written explanation for the change shall be submitted to the LAUSD OEHS CEQA Project Manager. If approved, the Surveyor/Biologist can reduce the demarcated buffer. • A Surveyor/Biologist shall be present on site during all grubbing and clearing of vegetation to ensure that these activities remain outside the demarcated buffer and that the flagging, stakes, and/or construction fencing are maintained, and to minimize the likelihood that active nests are abandoned or fail due to project activities. The Monitor shall send weekly monitoring reports to LAUSD OEHS CEQA Project Manager during the grubbing and clearing of vegetation, and shall notify LAUSD immediately if project activities damage avian nests. <p>Bird Surveys - Construction, Demolition, or Vegetation Removal at Existing Campuses</p> <ul style="list-style-type: none"> • If avoidance of the avian breeding season is not feasible, the Surveyor/Biologist with survey experience shall conduct a nesting bird surveys to determine if active nests are within or adjacent to the work area. • The survey shall be conducted no more than 3 days prior to construction activities. A memo describing results of the survey shall be submitted to the OEHS CEQA Project Manager. • If an active bird nest is observed, the Surveyor/Biologist shall determine the appropriate buffer around the nest. Buffers are determined on species-specific requirements and nest location. • The Monitor shall send weekly monitoring reports to LAUSD OEHS CEQA Project Manager. • No construction activity shall occur within the buffer zone until nest is vacated, juveniles have fledged, and there is no evidence of a second attempt at nesting. <p>Bat Surveys</p> <ul style="list-style-type: none"> • Bat species inventories and habitat use studies shall be completed for demolition or new construction projects in native habitat as well as projects that require the removal of mature conifer, cottonwood, sycamore or oak trees or abandoned buildings. • Bat surveys must be conducted by a qualified bat Surveyor or Biologist (Surveyor/Biologist). The Surveyor/Biologist shall use the appropriate combination of structure inspection, sampling, exit counts, and acoustic monitors to survey an area that may be affected by the project. • If bats are found, the Surveyor/Biologist shall identify the species and evaluate the colony to determine potential impacts. • Mitigation measures shall be determined on a project-specific basis and may include: <ul style="list-style-type: none"> ○ Avoidance ○ Humane exclusion prior to demolition <ul style="list-style-type: none"> ▪ Bats should not be evicted from roost sites during the reproductive period (May-September), or during winter hibernating periods to avoid direct mortality ▪ Bats should be flushed from trees prior to felling or trimming. ○ Off-site habitat improvements shall be conducted in coordination with the California Department of Fish and Wildlife.
<p>SC-BIO-4</p>	<p>LAUSD shall comply with the following conditions if a new school would be located in an area containing native habitat or if a protected tree would be removed from an existing campus:</p> <p>New Construction in Native Habitat</p> <p>LAUSD shall avoid constructing new schools in areas containing mature native protected trees to the extent feasible. If site avoidance is not feasible, individual trees should be protected. If protected trees may be impacted, the following condition(s) may be required:</p> <ul style="list-style-type: none"> • Translocation of rare plants is prohibited in most instances. 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.



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	<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 woodlands. Any creation of functioning woodlands shall be of similar composition, structure, and function of the affected woodland. The new woodland shall mimic the function, demonstrate recruitment, plant density, 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 may be purchased from a supplier that specializes in native seed collection and propagation. This method should reduce the risk of introducing diseases and pathogens into areas where they might not currently exist. • Woodland species should be replaced by planting seeds. Monitoring efforts, including the exclusion of herbivores, shall be employed to maximize seedling survival during the monitoring period. • Monitoring period for woodlands shall be at least 10 years with a minimum of 7 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. <p>LAUSD shall request CDFW review and comment on any translocation plans, habitat preservation, habitat creation and/or restoration plans.</p> <p>Removal of Protected Trees on Existing Campuses</p> <p>LAUSD shall comply with the LAUSD OEHS Tree Trimming and Removal Policy. This policy ensures the management of District trees while ensuring that District activities will not conflict with locally adopted tree preservation policies and ordinances.</p>
SC-BIO-5	<p>LAUSD shall comply with CDFW recommendations:</p> <ul style="list-style-type: none"> • Project development or conversion that results in a reduction of wetland acreage or wetland habitat values shall not occur unless, at a minimum, replacement or preservation results in “no net loss” of either wetland habitat values or acreage. • All wetlands and watercourses, whether intermittent or perennial, should be retained and provided with substantial setbacks which preserve the riparian and aquatic values and maintain their value to on-site and off-site wildlife populations. • A jurisdictional delineation of creeks and their associated riparian habitats shall be conducted pursuant to the USFWS wetland definition. • Implementation of recommended measures shall compensate for affected mature riparian corridors and loss of function and value of wildlife corridors.

Source: LAUSD 2018.

Notes: 2 - Substrate is the surface on which a plant or animal lives.

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

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- 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?**

Less than Significant Impact. The Project site is located in a highly urbanized area of the City of Los Angeles and has been developed and used as an active high school campus within an urbanized setting since 1971. The approximately 27.4-acre site is fully developed and predominantly hardscaped, with the exception of a football field, two baseball fields, and ornamental trees and landscaping. The existing sports fields and ornamental vegetation on the Project site does not constitute vegetation that would support any plant species that are considered sensitive by the California Native Plant Society (CNPS), or any candidate, sensitive or special-status species as categorized by the U.S. Fish and Wildlife Services (USFWS) or the California Department of Fish and Wildlife (CDFW). Project implementation would predominantly include interior renovations to existing buildings on site and would only entail 23,530 square feet of demolition, 149,630 square feet of remodeling, and the construction of a single 20,581 square-foot building. Additionally, projects implemented under the SUP were determined to have a less than significant impact to biological resources with implementation of the SCs, specifically SC-BIO-1, which requires that biological surveys be completed prior to Project implementation and that, in the unlikely event that any biological resources are identified during the survey period, potential impacts be reduced to a less-than-significant level. Therefore, given the existing conditions on the Project site, the range and scope of the proposed activity and the Project's adherence to the requirements outlined in SC-BIO-1 through SC-BIO-5, the proposed Project would have a less than significant impact on species identified as a candidate, sensitive, or special status species. No mitigation or further study is required.

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

Less than Significant Level. As stated above in Section IV(a), the Project site is entirely developed and predominantly hardscaped, with the exception of a football field, two baseball fields, and ornamental trees and landscaping. Bull Creek is a concrete-lined drainage that is tributary to the Los Angeles River, and which flows from north to south underneath the Project site. Bull Creek transitions into subterranean pipelines at two locations north of the Project site: the first near the intersection of Simonds Street and Index Street and the second near the intersection of Gothic Avenue and Simonds Street. Bull Creek remains subterranean beneath the entire Project site, following a southwesterly direction where it flows beneath the school, and then daylight into a single channel at the southern property boundary near Valjean Avenue. According to the National Wetlands Inventory, Bull Creek is considered a Riverine habitat and is classified as a temporarily flowing riverine channel with an artificial substrate created by an excavation.⁶⁰ The Riverine System includes all wetlands and deep-water habitats contained within a channel (except wetlands dominated by trees, shrubs, persistent emergent, emergent mosses, lichen and habitats containing ocean-derived salt of 0.5 parts per thousand or greater). However, Bull Creek is contained within a concrete channel and its banks have been graded and cleared of vegetation for the most part. Given this, Bull Creek does not support any vegetation that could comprise a

⁶⁰ U.S. Fish and Wildlife Service. 2019. National Wetlands Inventory. Accessed, May 10, 2019. <https://www.fws.gov/wetlands/Data/Mapper.html>.



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sensitive natural community as defined by the USFWS and CDFW. Additionally, the proposed Project would not include any alterations to Bull Creek, or its channel. Project implementation would predominantly include 23,530 square feet of demolition, 149,630 square feet of remodeling, and the construction of a single 20,581 square-foot building. Construction of the new classroom building would not entail pile driving. Additionally, the creek does not flow beneath the proposed site of the new building, but lies beneath the Project site, immediately east of the proposed construction. Project construction could affect seasonal water flow quality in Bull Creek, given that grading and excavation activities associated with the construction of the new classroom building on the southwest portion of the Campus would exacerbate the potential for polluted runoff to enter the creek. However, with adherence to the requirements outlined in SC-BIO-1 through SC-BIO-5 and SC-HWQ-1 through SC-HWQ-6, construction of the proposed Project would have a less than significant impact to any riparian habitat or other sensitive natural community. No mitigation or further study is required.

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

Less than Significant Impact. As stated above, Bull Creek is considered a Riverine Habitat, and is mapped by the National Wetlands Inventory. The proposed Project would not include any alterations to Bull Creek or its channel. Project implementation would predominantly include interior renovations to existing buildings on site and would only entail 23,530 square feet of demolition, 149,630 square feet of remodeling, and the construction of a single 20,581 square-foot building. However, construction of the new classroom building would not include pile driving, and the creek does not flow beneath the proposed site of the new building, but lies beneath the Project site, immediately east of the proposed construction. Project construction could affect seasonal water flow quality in Bull Creek, given that grading and excavation activities would exacerbate the potential for polluted runoff to enter the creek. However, with adherence to the requirements outlined in SC-BIO-1 through SC-BIO-5 and SC-HWQ-1 through SC-HWQ-6, construction of the proposed Project would have a less than significant impact to state and federally protected wetlands. No mitigation or further study is required.

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

Less than Significant Impact. The approximately 27.4-acre Project site is fully developed, fenced in, and predominantly hardscaped, with the exception of a football field, two baseball fields, and ornamental trees and landscaping. The Project site is surrounded by urban, developed land uses, and does not contain any greenbelts for wildlife movement, or native vegetation and undeveloped land capable of facilitating the movement of species between large tracts of native habitat. The Bull Creek channel connects the Van Norman Lakes Reservoir that is located approximately 0.3 mile to the northeast of the Project site to the Sepulveda Basin and the Los Angeles River approximately six mile south of the Project. However, the channel is below ground for approximately 0.25 mile beneath the Project, which would suppress its use for terrestrial wildlife movement. The Project will not impact the Bull Creek channel, so any potential use of the feature by terrestrial and wildlife movement would not be affected by the Project. There are no native wildlife nursery sites on or near the Project

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site. The Project site is located 3.5 miles south of the Angeles National Forest; however, the surrounding developed, urban land uses would generally preclude the movement of migratory wildlife from the Angeles Forest towards the Project site.

Birds nesting in trees on or near the Project site could potentially be disrupted during construction-related activities; however, implementation of SC-BIO-3 would ensure that impacts to nesting birds would be less than significant. Additionally, the Project would also adhere to the requirements outlined in SC-BIO-1, SC-BIO-2, SC-BIO-4 and SC-BIO-5. Given the above, the proposed Project would not 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, and impacts would be less than significant. No mitigation or further study is required.

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

Less than Significant Impact. A Tree Inventory Report (Appendix C) was prepared for the proposed Project per the City of Los Angeles Tree Preservation Ordinance No. 177.404 and the LAUSD guidelines. According to the Tree Preservation Ordinance, “protected” trees are coast live oak, western sycamore, Southern California black walnut, or California bay with trunk diameters (measured at 4.5 feet above grade) of 4 inches or greater. The LAMC permits the City’s Board of Public Works to grant permission to remove or relocate these species. Of the 177 inventoried trees, five are native species considered to be protected by the Tree Preservation Ordinance and 172 meet the City’s criteria for significant trees. Since the proposed Project could potentially impact protected trees, impacts are potentially significant. The proposed Project would adhere to SC-BIO-4, which establishes the LAUSD OEHS Tree Trimming and Removal Policy as a requirement for the removal of protected trees on an existing campus.⁶¹ This policy ensures the management of District trees while ensuring that District activities will not conflict with locally adopted tree preservation policies and ordinances. With implementation of SC-BIO-4, the Project would not conflict with any local policies or ordinances protecting biological resources and impacts would be less than significant. No mitigation or further study is required.

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

No Impact. The Project site is not located within an existing Habitat Conservation Plan, Natural Community Conservation Plan, or County of Los Angeles Significant Ecological Area (SEA). The nearest SEA is located approximately 2.5 miles northwest of Kennedy HS, near Oat Mountain.⁶² No impact would occur. No mitigation or further study is required.

⁶¹ City of Los Angeles. 2006. City of Los Angeles Tree Ordinance. Accessed, May 15, 2019. https://planning.lacity.org/Code_Studies/Other/ProtectedTreeOrd.pdf.

⁶² County Department of Regional Planning. 2019. “GIS-NET.” Accessed October 3, 2019. http://rpgis.isd.lacounty.gov/Html5Viewer/index.html?viewer=GISNET_Public.GIS-NET_Public.



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

Explanation:

This analysis incorporates information from the LAUSD Historic Context Statement, 1870 to 1969, prepared by Sapphos Environmental, Inc. 2014; and the John F. Kennedy High School Historical Resources Evaluation Report (HRER) prepared by Rincon in 2018. The HRER, and the Archaeological and Paleontological Resources Report are provided in Appendix A of this IS/MND. The Cultural Resources Database Searches are provided in Appendix D of this IS/MND.

Applicable SCs related to *cultural resources* impacts associated with the proposed Project are provided below. Please refer to Section 1.4.4, Project Plan and Building Design, for more information on the SCs of approval for LAUSD's construction, upgrade, and improvement projects.

LAUSD Standard Conditions of Approval

SC-CUL-1	<p>Historic Architect</p> <p>For projects involving structural upgrades to historic resources, the Design Team shall include a qualified Historic Architect with demonstrated project-level experience in historic projects.</p> <p>For campuses with qualifying historical resources under CEQA, the Design Team shall include a LAUSD-qualified Historic Architect. The Historic Architect/s shall meet the Secretary of the Interior's Professional Qualifications Standards and the standards described on page 8 of the LAUSD Design Guidelines and Treatment Approaches for Historic Schools. Throughout the project design progress the Historic Architect shall provide input to ensure compliance with the Secretary of the Interior's Standards for the Treatment of Historic Properties and LAUSD requirements and guidelines for the treatment of historical resources. Role of the Historic Architect The tasks of the Historic Architect on the Design Team shall include, but are not limited to:</p> <ul style="list-style-type: none"> The Historic Architect shall work with the Design Team (including the Structural Engineer) and LAUSD to ensure that project components, including new construction and modernization of existing facilities, comply with the Secretary of the Interior's Standards for the Treatment of Historic Properties and LAUSD Design Guidelines and Treatment Approaches for Historic Schools. The Historic Architect shall work with the Design Team and LAUSD throughout the design process to develop project options that facilitate compliance with the applicable historic preservation standards. For new construction, the Historic Architect shall work with the Design Team and LAUSD to identify options and opportunities for: (1) ensuring compatibility of scale and character for new construction, site and landscape features, and circulation corridors, and (2) ensuring that new construction is designed and sited in such a way that reinforces and strengthens, as much as feasible, character-defining site plan features, landscaping, and circulation corridors throughout campus.
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	<ul style="list-style-type: none"> • For modernization and upgrade projects involving contributing (significant) buildings or features, the Historic Architect shall work with the Design Team and LAUSD to ensure that specifications for design and implementation of projects comply with the applicable historic preservation standards. • The Historic Architect shall participate in Design Team meetings during all phases of the project through 100% construction drawings, pre-construction, and construction phases, as applicable. • The Historic Architect shall prepare a memo at the 50% and at the 100% construction drawings stages, demonstrating how principal project components and treatment approaches comply with applicable historic preservation standards, including the Secretary of the Interior's Standards for the Treatment of Historic Properties and LAUSD Design Guidelines and Treatment Approaches for Historic Schools. The memos shall be submitted to LAUSD OEHS for review. • The Historic Architect shall participate in pre-construction and construction monitoring activities, as appropriate, to ensure continuing conformance with Secretary's Standards and/or avoidance of a material impairment of the historical resources. • The Historic Architect shall provide specifications for architectural features or materials requiring restoration or removal, maintaining and protecting relevant features in place, or on-site storage. Specifications shall include detailed drawings or instructions where historic features may be impacted. • The Design Team and Historic Architect shall be responsible for incorporating LAUSD's recommended updates and revisions during the design development and review process
SC-CUL-2	<p>LAUSD shall follow the guidelines outlined in these documents to the maximum extent practicable when planning and implementing projects and adjacent new construction involving historical resources.</p> <p>The Design Team, Historic Architect, and Construction Contractor shall apply LAUSD School Design Guide and LAUSD Design Guidelines and Treatment Approaches for Historic Schools and the Secretary's Standards for all new construction and modernization projects. In keeping with the District's adopted policies and goals, historical resources shall be reused rather than destroyed, where feasible. General guidelines include:</p> <ul style="list-style-type: none"> • Retain and preserve the character of historic resources. • Repair rather than remove, replace, or destroy character-defining features; if replacement is necessary, replace in-kind to match materials, dimensions, and appearance. • Treat distinctive architectural features or examples of skilled craftsmanship that characterize a building with sensitivity. • Where practical, conceal reinforcement required for structural stability or the installation of life safety or mechanical systems. • Where necessary to halt deterioration and after the preparation of a condition assessment, undertake surface cleaning, preparation of surfaces, and other projects involving character-defining features using the least invasive, gentlest means possible. Avoid using any abrasive materials or methods including sandblasting and chemical treatments.
SC-CUL-3	<p>Prior to any major alteration to or adjacent to a historic resource that may potentially damage historic resources (or previously identified historic features), the Historic Architect shall develop a Temporary Protection Plan that identifies potential risks to the historic resource. The Temporary Protection Plan shall be prepared in coordination with the Construction Contractor and LAUSD prior to demolition or construction. The Temporary Protection Plan may include, but not be limited to, the following components:</p> <ul style="list-style-type: none"> • Notation of the historic resource on construction plans. • Pre-construction survey to document the existing physical condition of the historic resource. • Procedures and timing for the placement and removal of temporary protection features, around the historic resource. • Monitoring of the installation and removal of temporary protection features by the Historic Architect, or designee. • Post-construction survey to document the condition of the historic resource after Project completion. • Preparation of a technical memorandum documenting the pre-construction and post-construction conditions of the historic resource and compliance with protective measures outlined Temporary Protection Plan.



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SC-CUL-5	LAUSD shall comply with Design Specification 01 3591, Historic Treatment Procedures, as applicable. This Specification requires the Construction Contractor to submit a Historic Treatment Plan to the District for the protection, repair, and replacement of historic materials and features.
SC-CUL-6	<p>LAUSD shall retain a qualified Archaeologist to be available on-call. The Archaeologist shall meet the Secretary of the Interior's Professional Qualifications Standards (48 Federal Register 44738–39). The archaeologist must have knowledge of both prehistoric and historical archaeology.</p> <p>To reduce impacts to previously undiscovered buried archaeological resources, following completion of the final grading plan and prior to any ground disturbance, a qualified archaeologist shall prepare an Archaeological Monitoring Program as described under SC-CUL-7.</p>
SC-CUL-7	<p>The Construction Contractor shall halt construction activities within a 30-foot radius of the find and shall notify the LAUSD.</p> <ul style="list-style-type: none"> • LAUSD shall retain an Archaeologist that meets the Secretary of the Interior's Professional Qualifications Standards (48 Federal Register 44738–39). The archaeologist must have knowledge of both prehistoric and historical archaeology. • The Archaeologist shall have the authority to halt any project-related construction activities that could impact potentially significant resources. • The Archaeologist shall be afforded the necessary time to recover and assess the find. Ground-disturbing activities shall not continue until the discovery has been assessed by the Archaeologist. With monitoring, construction activities may continue on other areas of the project site during evaluation and treatment of historic or unique archaeological resources. • If the find is determined to be of value, the Archaeologist shall prepare an Archaeological Monitoring Program and shall monitor the remainder of the ground-disturbing activities. • Significant archaeological resources found shall be curated as determined necessary by the Archaeologist and offered to a local museum or repository willing to accept the resource. • Archaeological reports shall be submitted to the South Central Coastal Information Center at the California State University, Fullerton. • The Archaeological Monitoring Plan shall include: <ul style="list-style-type: none"> ○ Extent and duration of the monitoring based on the grading plans ○ At what soil depths monitoring of earthmoving activities shall be required ○ Location of areas to be monitored ○ Types of artifacts anticipated ○ Procedures for temporary stop and redirection of work to permit sampling, including anticipated radius of suspension of ground disturbances around discoveries and duration of evaluation of discovery to determine whether they are classified as unique or historical resources ○ Procedures for maintenance of monitoring logs, recovery, analysis, treatment, and curation of significant resources ○ Procedures for archaeological resources sensitivity training for all construction workers involved in moving soil or working near soil disturbance, including types of archaeological resources that might be found, along with laws for the protection of resources. The sensitivity training program shall also be included in a worker's environmental awareness program that is prepared by LAUSD with input from the Archaeologist, as needed. ○ Accommodation and procedures for Native American monitors, if required. ○ Procedures for discovery of Native American cultural resources. • The construction manager shall adhere to the stipulations of the Archaeological Monitoring Plan.
SC-CUL-8	Cultural resources sensitivity training shall be conducted for all construction workers involved in ground-disturbing activities. This training shall review the types of archaeological resources that might be found, along with laws for the protection of resources and shall be included in a worker's environmental awareness program that is prepared by LAUSD with input from a qualified Archaeologist, as needed.

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SC-CUL-9	LAUSD shall determine whether it is feasible to prepare and implement a Phase III Data Recovery/Mitigation Program. If feasible, the Archaeologist shall prepare a Phase III Data Recovery/Mitigation Program to outline procedures to recover a statistically valid sample of the archaeological remains and to document the site and reduce impacts to be less than significant. All documentation shall be prepared in the standard format of the ARMR Guidelines, as prepared by the OHP. Once a Phase III Data Recovery/Mitigation Program is completed, an Archaeological Monitor shall be present to oversee the ground-disturbing activities to ensure that construction proceeds in accordance with the Program.
SC-CUL-10	All work shall stop within a 30-foot radius of the discovery. Work shall not continue until the discovery has been evaluated by a qualified Archaeologist and the local Native American representative has been contacted and consulted to assist in the accurate recordation and recovery of the resources.
SC-CUL-11	<p>LAUSD shall retain a Paleontological Monitor to oversee specific ground-disturbing activities as determined by the scope of work and final grading plan. The Monitor shall provide the construction crew(s) with a brief summary of the sensitivity, the rationale behind the need for protection of these resources, and information on the initial identification of paleontological resources.</p> <p>If paleontological resources are uncovered, the Construction Contractor shall halt construction activities within a 30 foot radius of the find and shall notify the LAUSD.</p> <ul style="list-style-type: none"> • Ground-disturbing activities shall not continue until the discovery has been assessed by the Paleontologist. • The paleontologist shall have the authority to halt construction activities to allow a reasonable amount of time to identify potential resources. • Significant resources found shall be curated as determined necessary by the Paleontologist.

Existing Conditions

Cultural Setting

Prehistoric

Numerous chronological sequences have been devised to aid in understanding cultural changes within southern California. Building on early studies and focusing on data synthesis, Wallace (1955, 1978) developed a prehistoric chronology for the Southern California coastal region that is still widely used today and is applicable to near-coastal and many inland areas. Four periods are presented in Wallace's prehistoric sequence: Early Man (Horizon I), Milling Stone (Horizon II), Intermediate (Horizon III), and Late Prehistoric (Horizon IV). The earliest accepted dates for occupation are from two of the northern Channel Islands, located off the coast of Santa Barbara. On San Miguel Island, Daisy Cave clearly establishes the presence of people in this area about 10,000 years ago (Erlandson 1991). Recent data from Horizon I sites indicate that the economy was a diverse mixture of hunting and gathering, with a major emphasis on aquatic resources in many coastal areas and on Pleistocene lakeshores in eastern San Diego County (see Moratto 1984). The Milling Stone Horizon of Wallace (1955, 1978) and Encinitas Tradition of Warren (1968) (6000–3000 BC) are characterized by subsistence strategies centered on collecting plant foods and small animals. Following the Milling Stone Horizon, Wallace's Intermediate Horizon and Warren's Campbell Tradition in Santa Barbara, Ventura, and parts of Los Angeles Counties, date from approximately 3000 BC to AD 500 and are characterized by a shift toward a hunting and maritime subsistence strategy, along with a wider use of plant foods. In the Late Prehistoric Horizon (Wallace 1955, 1978), which lasted from the end of the Intermediate (ca. AD 500) until European contact, there was an increase in the use of plant food resources in addition to an increase in land and sea mammal hunting. There was a concomitant increase in the diversity and complexity of material culture during the Late Prehistoric.



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Ethnographic

The proposed Project is in an area historically occupied by the Gabrielino. The archaeological record indicates that the Gabrielino arrived in the Los Angeles Basin around 500 BC. Many contemporary Gabrielino identify themselves as descendants of the indigenous people living across the plains of the Los Angeles Basin and adjacent areas. The name “Gabrielino” denotes those people who were administered by the Spanish from the San Gabriel Mission, which included people from the Gabrielino area proper as well as other social groups (Bean and Smith 1978; Kroeber 1925). Many modern Gabrielino identify themselves as descendants of the indigenous people living across the plains of the Los Angeles Basin and refer to themselves as the Tongva (King 1990), while others reject this term. Gabrielino lands encompassed the greater Los Angeles Basin and three Channel Islands, San Clemente, San Nicolas, and Santa Catalina. The Gabrielino established large, permanent villages in the fertile lowlands along rivers and streams, and in sheltered areas along the coast, stretching from the foothills of the San Gabriel Mountains to the Pacific Ocean. A total tribal population has been estimated of at least 5,000 (Bean and Smith 1978), but recent ethnohistoric work suggests a number approaching 10,000 (O’Neil 2002).

Historic

Post-Contact history for the state of California is generally divided into three periods: the Spanish Period (1769–1822), Mexican Period (1822–1848), and American Period (1848–present). Although Spanish, Russian, and British explorers visited the area for brief periods between 1529 and 1769, the Spanish Period in California begins with the establishment in 1769 of a settlement at San Diego and the founding of Mission San Diego de Alcalá, the first of 21 missions constructed between 1769 and 1823. Independence from Spain in 1821 marks the beginning of the Mexican Period, and the signing of the Treaty of Guadalupe Hidalgo in 1848, ending the Mexican-American War, signals the beginning of the American Period when California became a territory of the United States. California officially became a state with the Compromise of 1850, which also designated Utah and New Mexico (with present-day Arizona) as U.S. Territories (Waugh 2003). Horticulture and livestock, based primarily on cattle as the currency and staple of the rancho system, continued to dominate the southern California economy through 1850s. The Gold Rush began in 1848, and with the influx of people seeking gold, cattle were no longer desired mainly for their hides but also as a source of meat and other goods. During the 1850s cattle boom, rancho vaqueros drove large herds from southern to northern California to feed that region’s burgeoning mining and commercial boom. The cattle boom ended for southern California as neighbor states and territories drove herds to northern California at reduced prices. Operation of the huge ranchos became increasingly difficult, and droughts severely reduced their productivity (Cleland 1941).

Project Site History

The San Fernando Valley assumed its agricultural identity almost immediately. Lankershim and Van Nuys introduced dry wheat farming to the San Fernando Valley in 1876 while George K. Porter, who owned large swaths of the valley including the land that would become Granada Hills, established the Porter Land & Water Company which experimented with citriculture and irrigation (Historic Resources Group 2015). Their technique used water captured in the winter season, rather than relying on water from big Tujunga, Little Tujunga or Pacoima Canyons. Lack of access to the region’s water rights and droughts made it so that dry farming became a viable type of farming available in the region. Dry farming techniques as a production method brought fruit, citrus, and grain farming to the region, but continuing drought and unpredictable weather made dry farming unreliable (Height 1953; Roderick 2001; Wanamaker 2011).

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Los Angeles voters approved \$22 million for the Los Angeles Aqueduct project in 1905 and construction on the aqueduct began in 1908. The aqueduct, which would bring water from Owens Valley to the City of Los Angeles, brought intensive land speculation and settlement to the San Fernando Valley. With the new source of water, San Fernando Valley farmers exchanged dry farming for irrigation system farming for crops and orchards. Agriculture expanded throughout the San Fernando Valley and specific towns became associated with certain crop production. For example, citrus farms and walnuts were common in Granada Hills, Pacoima, Canoga Park, and Chatsworth. Poultry and dairy farms were associated with the towns of Reseda, Mission Acres and Van Nuys. In 1915 the majority of the communities of the San Fernando Valley, including Granada Hills, voted for annexation into the City of Los Angeles, in order to take advantage of the water coming from the new aqueduct. This annexation event, known as the San Fernando Addition, had the effect of more than doubling the area of Los Angeles City overnight, adding approximately 170 square miles east of Burbank, south of the Santa Monica Mountains, and west of the Los Angeles County line (Height 1953; Preston 1965; Roderick 2001; Wanamaker 2011).

In 1920, the San Fernando Valley population was estimated at 20,000 people. By 1930, the valley's population had doubled to just over 51,000. The agricultural economy of the valley remained stable through the Great Depression and settlement in the east and southeast portions of the valley developed into four major towns: San Fernando, Burbank, Van Nuys, and North Hollywood. These towns functioned as shipping, storage, and marketing centers for the surrounding agricultural areas. Burbank became increasingly industrial and turned to aircraft manufacturing (Lockheed) and motion picture production as major industries. By 1940, the San Fernando Valley population was 155,443. Despite the growing residential population, small-scale farms and orchards still dominated land use in the San Fernando Valley through World War II (Height 1953; Preston 1965; Roderick 2001; Wanamaker 2011).

World War II brought increased urbanization as military operations near Los Angeles brought in hundreds of thousands of soldiers and their families. After the war, both employment opportunities and affordable real estate kept families in the area. Suburban sprawl from Los Angeles reached the San Fernando Valley, and brought another 250,000 people to the valley, raising its 1950 population to just over 400,000. Dense housing developments and residential areas constricted formerly agricultural areas, all but pushing them into the surrounding foothills and margins of the Valley for the rest of the century (Preston 1965; Roderick 2001).

As automobiles and freeways permeated the culture of the country and the state of California, so too did they have impact in the San Fernando Valley. From 1958-1965, I-5 was completed in the eastern portion of the valley. Similarly, I-210, State routes CA-170, CA-118, US Route 101, and Interstate 405 transverse the Valley, and were developed from late 1950s through the early 1970s. These highways brought an emphasis on automobile travel and allowed San Fernando Valley residents ease of access for commuting around the greater Los Angeles area, but also destroyed farms, neighborhoods, and cut through early town grids in the construction effort (Roderick 2001).

Kennedy HS

The following text is verbatim from *Los Angeles Unified School District (LAUSD). 2018. John F. Kennedy High School: Historical Resources Evaluation Report. Prepared by Rincon Consultants Los Angeles, CA.* Page numbers are cited accordingly.



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“The population and residential expansion of the postwar era continued to strain the resources of the newly formed LAUSD into the mid-1960s. In 1966, in response to this demand and overcrowding of nearby Monroe High School (1958) and Granada Hills High School (1960), voters approved funding for the construction of a new high school in the Granada Hills neighborhood.¹⁵ After eight months of surveys, the current site was selected and approved by the Los Angeles City Council, and preliminary plans were commissioned by the architectural firm of Stewart S. Granger & Associates.¹⁶ The school was originally planned to include 78 classrooms with a capacity of 2,500 students. Argo Construction, a company with whom Stewart S. Granger & Associates previously partnered on the construction of Dana Point Marina, subsequently won the construction bid of Kennedy, which was reported at \$7.9 million. (LAUSD 2018:14)

The Los Angeles City Council approved the vacation of streets located within the boundaries of the future campus, and the site was cleared and graded by 1969. Development of the 27.4-acre parcel continued over the next two years and included the construction of Campus buildings (including an administration building, classrooms, shops, and an oral arts building), athletic facilities, and surface parking lots (Figure 6, Figure 7, Figure 8a through 8d and Figure 9). The original Campus buildings featured a unique Mid-Century-Modern/New Formalist architectural style, unified in a site plan with central courtyards, hardscaping and gathering areas, and sheltered corridors and circulation corridors. In 1971, construction was completed and classes began in the fall semester (LAUSD 2018: 14).”

The original site plan and a majority of the original buildings have remained largely unaltered since this time, except for the following changes. Following the 1994 Northridge Earthquake, the original Administration Building and Gymnasium Building experienced substantial damage. The Administration Building was demolished that same year and eventually replaced in 2002 with the current building, in the same location as the original, with similar massing, materials, and features. The original gymnasium was demolished in 2002 and replaced the following year by the current Gymnasium Building, just east of its original location. The site of the original Gymnasium was developed into a softball field after the time of the building’s demolition. Additionally, tennis courts were constructed to the south of the Science Building, which replaced a former surface parking lot. (LAUSD 2018: 16)

An additional one-story classroom building was added to the Campus in 2000; this building is now the northwestern-most building on Campus. Although new, the classroom building is sited in a manner that is sympathetic to the original site plan design. Additionally, the 22 portable buildings are sited throughout Campus (LAUSD 2018:16).

Methods

The following section provides a brief summary of cultural resource identification efforts. For more detailed information see the technical reports prepared for this Project located in Appendix A.

Cultural Resources Record Search

A California Historical Resources Information System (CHRIS) records search was conducted for the proposed Project site and a 0.5-mile radius at the South Central Coastal Information Center (SCCIC), located on the campus of California State University, Fullerton on February 12, 2019. The search included a review of all previously recorded prehistoric, historic, and built-environment resources located within the proposed Project site and a 0.5-mile radius, including Department of Parks and Recreation site records, technical reports, archival resources, and

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ethnographic references. Additional sources reviewed included the National Register of Historic Places, California Office of Historic Preservation Historic Properties Data File, the Archaeological Determinations of Eligibility listings, California Points of Historical Interest, and California Historical Landmarks.

Previously Conducted Cultural Resource Studies

The SCCIC records indicate that seven previous cultural resources technical investigations have been conducted within 0.5-mile (804 meters) of the proposed Project between 1973 and 2012. Of these, one previous study, LA-7008, overlaps the proposed Project site and two studies, LA-3289 and LA-11606, are adjacent to the proposed Project site. Table 10, below, summarizes all seven previous cultural resource studies followed by a brief summary of each study that overlaps or is adjacent to the proposed Project site.

Table 10
Previously Technical Studies Within the 0.5-Mile Search Buffer

Report Number	Author	Year	Report Title	Proximity to Proposed Project Site
LA-00014	Kelly, Roger E.	1973	Assessment of the Archaeological Resources and the Impact of Development of Highway 118 From Desoto Avenue to the San Diego Freeway in the San Fernando Valley	Outside
LA-00051	Kelly, Roger E. and Gerald R. Gates	1974	Cultural Resources of Los Angeles Reservoir, City of Los Angeles	Outside
LA-03289	Davis, Gene	1990	Mobil M-70 Pipeline Replacement Project Cultural Resource Survey Report for Mobil Corporation	Adjacent
LA-04766	Duke, Curt	1999	Cultural Resource Assessment for Pacific Bell Mobile Services Facility La 219-01, County of Los Angeles, California	Outside
LA-07008	Unknown	2002	Los Angeles Unified School District Site Expansion of Kennedy High School Facilities Located at 11254 Gothic Avenue, Granada Hills in the City of Los Angeles	Overlapping
LA-11606	Maxon, Patrick	2011	Phase I Cultural Resources Assessment, Sylmar Ground Return Replacement Project, Los Angeles County, California	Adjacent
LA-11818	Dietler, Sara, Linda Kry, and Heather Gibson	2012	Phase I Cultural Resources Assessment for the Van Norman Complex Water Quality Improvement Project City of Los Angeles, California	Overlapping



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Report LA-3289

Mobil M-70 Pipeline Replacement Project Cultural Resource Survey Report for Mobil Corporation (Gene 1990) reports the results of a record search and pedestrian survey for the Mobil Oil Corporation's proposed 92.05-mile replacement corridor. The records search and pedestrian survey indicated that three cultural resources were within the Area of Potential Effects for one or more of the proposed routes for the pipeline. Monitoring and testing, based on the route ultimately chosen, was recommended to avoid impacts to cultural resources. None of the resources identified as part of this Project are within the record search buffer for the current proposed Project site.

Report LA-7008

Los Angeles Unified School District Site Expansion of Kennedy High School Facilities Located at 11254 Gothic Avenue, Granada Hills in the City of Los Angeles (Unknown 2002), reports the results of cultural resources record search for the proposed expansion at Kennedy High School. The records search identified one prehistoric resource within 0.5 mile of the Project site. The author recommended that contractors be aware of the potential to impact resources at the site and recommended that a qualified archaeologist be on-call.

Report LA-11606

Phase I Cultural Resources Assessment, Sylmar Ground Return Replacement Project, Los Angeles County, California (Patrick 2011), reports the results of a cultural resource records search and assessment for proposed upgrades to the Sylmar Converter Station transmission system. The records search identified eight archaeological sites within a 1.0-mile records search buffer, none of which intersected the Project. None of the resources identified were found to have the potential to be impacted. None of the resources identified as part of this Project are within the record search buffer for the current proposed Project.

Previously Recorded Cultural Resources

The SCCIC records indicate that three resources have been recorded within 0.5-mile (804 meters) of the proposed Project site. None of the three resources intersect or overlap the proposed Project site. The resources include one groundstone and lithic scatter (P-19-000646), the Van Norman Reservoir Archeological district, which included nine prehistoric and multicomponent sites (P-19-175538), and the historic Bull Creek Extension Channel (P-19-190043). Both P-19-00646 and P-19-175538 have been determined eligible and listed on the National Register. P-19-190043 has been determined ineligible for listing on the National Register. All three resources are summarized below in Table 11.

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Table 11
Previously Recorded Cultural Resources Within the 0.5-Mile Search Buffer

Primary Number	Trinomial	Period	NRHP/CRHP Status	Description	Recorded By/Year	Proximity to Proposed Project Site
P-19-000646	CA-LAN-000646/H	Multicomponent	2S (Determined Eligible; Listed in the CR)	Groundstone and lithic scatter; Site has not been updated or relocated since 1974	1974 (Kelly et al.)	Outside
P-19-175538	-	Multicomponent	2S (Determined Eligible; Listed in the CR)	Van Norman Reservoir Archaeological District- includes P-19-000475,- 000490, - 000491, - 000492, - 000493, - 000642, - 000643, - 000645, and - 000646	1974 (G. Gates & Dr. A Gilman, Northridge Archaeological Center)	Outside
P-19-190043	-	Historic	6Y (Determined ineligible for NR through Section 106 Process)	Bull Creek Extension Channel; Resource has already been determine ineligible and therefore no significant impact will result.	2011 (Sara Dietler, Linda Kry, Tim Harris, AECOM)	Outside

Previous Evaluation: Kennedy HS

In April 2018 LAUSD contracted with Rincon Consultants, Inc. (Rincon) to prepare a Historical Resources Evaluation Report (HRER; Appendix A) for the Kennedy HS Campus. As part of the 2018 study, the Campus was evaluated under NRHP, CRHR, and Los Angeles Historic-Cultural Monuments (LAHCM) Criteria. No element of the school Campus was found eligible for listing under NRHP Criteria, primarily because as a property built in 1971, it did not meet the NRHP Criterion Consideration G thresholds of exceptional significance for a property under the age of 50. Rincon identified a portion of the Campus as eligible for listing as a historic district under CRHR/LAHCM Criterion 3/3, “as an outstanding embodiment of the Mid-Century Modern/New Formalist architecture as applied to an institutional/education facility” (LAUSD 2018: 1). Table



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12 below summarizes the eligibility findings for the entire Campus, specifically, it lists which buildings are historic district contributors and non-contributors. The historic district and its contributing elements are considered historical resources under CEQA. The other buildings on Campus considered non-contributing as listed in Table 12, Kennedy High School Campus Historic District Findings, and are not considered historical resources under CEQA. Contributing elements of the Campus are limited to Buildings 1 through 9 and landscaping/site plan features within the historic district boundary shown on Figure 9, Kennedy High School Historic District Contributing Features Map.

Table 12
Kennedy High School Campus - Historic District Findings

Building No.	Building Name	Type	Year Built	Historic District Status
1	Library Building	Permanent	1971	Contributor
2	Science Building	Permanent	1971	Contributor
3	2-Story Classroom Building B	Permanent	1971	Contributor
4	Student Store Building	Permanent	1971	Contributor
5/19	Cafeteria Building	Permanent	1971	Contributor
6	Oral Arts Building	Permanent	1971	Contributor
7	Adult School Office	Permanent	1971	Contributor
8	Classroom Building	Permanent	1971	Contributor
9	Music Building	Permanent	1971	Contributor
10	Transformer Building/Vault	Permanent	1971	Non-Contributor
11	Boiler Building/Vault	Permanent	1971	Non-Contributor
12	Classroom Building	Permanent	1971	Non-Contributor
13	Shop Building	Permanent	1971	Non-Contributor
14	Utility Building	Permanent	1971	Non-Contributor
15	Flammable Storage Building	Permanent	1971	Non-Contributor
16	Sanitary Building	Permanent	1971	Non-Contributor
17	Announcers Building/Booth	Permanent	1971	Non-Contributor
20	Sanitary Building	Permanent	1971	Non-Contributor
21	Gymnasium Building	Permanent	2003	Non-Contributor
22	New Classroom Building	Permanent	2000	Non-Contributor
23	New Administration & Classroom Building	Permanent	2002	Non-Contributor
23	NP 1-2 – Two Classroom Relocatable	Portable	2003	Non-Contributor

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Table 12
Kennedy High School Campus - Historic District Findings

Building No.	Building Name	Type	Year Built	Historic District Status
24	SP 1 – Standard Classroom Relocatable	Portable	1986	Non-Contributor
25	A-873	Portable	1986	Non-Contributor
26	SP 3 – Standard Classroom Relocatable	Portable	1986	Non-Contributor
27	SP 4 – Standard Classroom Relocatable	Portable	1986	Non-Contributor
28	SP 5 – Standard Classroom Relocatable	Portable	1986	Non-Contributor
29	SP 6 – Standard Classroom Relocatable	Portable	1986	Non-Contributor
30	SP 7 – Standard Classroom Relocatable	Portable	1986	Non-Contributor
31	SP 8 – Standard Classroom Relocatable	Portable	1986	Non-Contributor
32	SP 9 – Standard Classroom Relocatable	Portable	1986	Non-Contributor
33	SP 10-11 – Relocatable	Portable	2000	Non-Contributor
34	SP 12 – Single Classroom Relocatable	Portable	1994	Non-Contributor
35	SP 13 – Single Classroom Relocatable	Portable	Unknown	Non-Contributor
36	SP 15 –Relocatable	Portable	2003	Non-Contributor
37	SP 16 – Single Relocatable	Portable	2003	Non-Contributor
38	SP 17 – Single Relocatable	Portable	1994	Non-Contributor
39	Portable Sanitary Unit	Portable	2003	Non-Contributor
41	EP 1 – Single Classroom Relocatable	Portable	2003	Non-Contributor



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Table 12
Kennedy High School Campus - Historic District Findings

Building No.	Building Name	Type	Year Built	Historic District Status
42	EP 2-3 – Two Classroom Relocatable	Portable	2003	Non-Contributor
43	EP 4-5 – Two Classroom Relocatable	Portable	2003	Non-Contributor
45	NP 3-4 – Two Classroom Relocatable	Portable	2003	Non-Contributor
46	NP 5-6 – Two Classroom Relocatable	Portable	2003	Non-Contributor

Source: Historic Resources Evaluation Report, Rincon Consultants, April 2018; Appendix A.

Kennedy High School Historic District – Contributing Historical Resources

The following section provides a summary of the character defining features (CDFs) for each of the nine contributing buildings as well as one contributing landscape to the Kennedy HS Historic District. The CDFs are the physical features of a historical resource that help to convey its significance. The following CDFs are summarized from Rincon’s 2018 report and the Update Department of Parks and Recreation 523 form prepared by Dudek in 2019. Both are located in Appendix A.

Library Building (Building 1). The Library was originally constructed in 1971 in the Mid-Century Modern/New Formalism style. Character-defining features include L-shaped plans creating a courtyard with hardscaping/circulation corridors and stairways, defined by brick pavers and concrete walkways, sheltered walkways, and breezeways, low and varied massing, central prominent one-and-one-half-story wing flanked by single-story wings, symmetrical design composition, use of full-height smooth concrete panels, balanced design with broad, bold roof line, stacked-bond brick veneer, rusticated brick veneer, smooth concrete, and stucco exterior walls. Other character-defining features include a flat roof with stucco-clad boxed soffits, wide overhanging eaves, and a waffle-patterned fascia accenting the roof line, rectangular windows set within projecting concrete surrounds and full-height, smooth concrete panels, the main entrance of paired metal-framed doors accessed via a sheltered breezeway, east elevation entrance with paired metal-framed doors and breezeways connecting to adjacent Science Building.

Science Building (Building 2). The Science Building was originally constructed in 1971 in the Mid-Century Modern/New Formalism style. Character-defining features include low two-story massing, rectangular floorplan oriented around landscaped courtyards/open spaces and a unified network of circulation corridors, defined by brick pavers and concrete walkways, sheltered walkways, and breezeways, monumental, symmetrical design composition in the use of full-height stucco-clad attached columns, broad, bold roof line, exterior walls clad in smooth stucco, stacked-bond brick veneer, and rusticated brick veneer. Other character-defining features include a flat roof with stucco-clad boxed soffits, wide overhanging eaves, and a procession of deeply recessed square

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accents encircling the roof line, procession of thin, rectangular metal-frame lights set within decorative, projecting concrete surrounds and slightly recessed, full-height, stucco-clad panels, mimicking attached columns, roof-wall juncture defined by a simple recessed band, painted gray, full-height entry porch clad with rusticated brick veneer, deeply recessed paired metal-frame doors with decorative surrounds, raised concrete patio and walkway, sheltered corridor, steps and ramp (west elevation), green space and concrete circulation corridors, south and east façades of Science Building. Overall, the building retains a high degree of physical integrity.

Classroom #1 (Building 3). Classroom #1 was originally constructed in 1971 in the Mid-Century Modern/New Formalism style. Character-defining features include low two-story massing, square-planned, oriented around landscaped courtyards/open spaces and a unified network of circulation corridors, defined by brick pavers and concrete walkways, sheltered walkways, and breezeways, clad in tan, stack-bond rusticated brick veneer, symmetrical design composition, use of full-height concrete wall panels and projecting window surrounds. Other character-defining features include prominent, broad roofline, with wide boxed eaves and distinctive waffle-patterned fascia, window units consisting of two fixed, metal-framed windows stacked vertically in thin, projecting concrete surrounds, entrance located on ground level of north and south elevations, featuring double-metal doors, façade-wide grey band, recessed at the roof-wall juncture, narrow, landscaped greenspace along base of the west elevation, series of brick-sized bronze class plaques, dating back to early 1970s, spanning façade, and a wall-mounted clock in top east corner, two deep, recessed L-shaped hallways on the east elevation that extend the entire height of the wall plane. Overall, the building retains a high degree of physical integrity.

Cafeteria and Lunch Pavilion (Building 4). The Cafeteria and Lunch Pavilion was originally constructed in 1971 in the Mid-Century Modern/New Formalism style. Character-defining features include low one-story and one-and-a-half story massing, rectangular in plan oriented around landscaped courtyards/open spaces and a unified network of circulation corridors, defined by brick pavers and concrete walkways, sheltered walkways, and breezeways with components oriented to form a sheltered, open-air dining area. Other character-defining features include stacked-bond rusticated brick veneer, contrasting with smooth concrete on the full-height window surrounds, a breezeway with square post supports, prominent flat roof with wide overhanging eaves, smooth concrete surrounds and rectangular windows, including six windows located on the south elevation, a flat roof with wide eaves sheltering covered corridor on south elevation, corridor roof rests on square concrete columns and a cantilevered, scored concrete deck that extends along the south elevation of the building, both the south and east elevation feature two entrances, including a single-metal and double-metal door that is void of ornamentation, transoms, or sidelights. The food serving area on east elevation, is lined with expanse of metal roll-up windows, fronted by round steel balustrades; decorative tile work beneath windows spells out “Kennedy,” and a decorative, full-height mural on east elevation, consisting of small yellow and brown tiles, featuring the letters “K.H.S.” Overall, the building retains a high degree of physical integrity.

Student Store (Building 5). The Student Store was originally constructed in 1971 in the Mid-Century Modern/New Formalism style. Character-defining features include low one-story massing, rectangular in plan oriented around landscaped courtyards/open spaces and a unified network of circulation corridors, defined by brick pavers and concrete walkways, sheltered walkways, and breezeways, prominent, broad overhanging eaves, sheathed in smooth stucco. Other character-defining features include stacked-bond rusticated brick veneer, contrasting with smooth concrete on the full-height window surrounds, a breezeway with square post supports, prominent flat roof with wide overhanging eaves, the primary (west) elevation displays three roll-up windows,



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round steel balustrades, and decorative tile work consisting of small, square yellow tiles, the entrance consists of two metal-framed doors, on either side of windows; rear (east) elevation includes a single metal-framed door, elevated on four concrete steps, and the rear elevation opens onto landscaped courtyard, surrounded by garden walls, curb walls and planters of rusticated brick with square concrete caps. Overall, the building retains a high degree of physical integrity.

Oral Arts Building (Building 6). The Oral Arts Building was originally constructed in 1971 in the Mid-Century Modern/New Formalism style. Character-defining features include, low one-story massing, with a central one-and-one-half-story wing flanked by single-story wings, roughly rectangular in plan oriented around landscaped courtyards/open spaces and a unified network of circulation corridors, defined by brick pavers and concrete walkways, sheltered walkways, and breezeways, exterior walls clad primarily in stacked-bond brick veneer, rusticated brick veneer, smooth concrete, stucco, and decorative tiles. Other character-defining features include symmetrical design composition, use of full-height smooth concrete panels, which contrast with rusticated brick veneer and emphasize vertical axis, design balanced with broad, bold roof line, which emphasizes the horizontal axis, distinctive roof treatment, including flat roof, stucco-clad boxed soffits, wide overhanging eaves, and a waffle-patterned fascia accenting the roof line, on south (primary) elevation, a formal entrance patio slightly projects from the wall plane, framed in brick corner posts, spanning the wall above the entrance patio is a decorative mosaic of small, square, brown and tan tiles, centered on the mosaic panel is a stylized metal sign reading “Drama & Speech,” north (rear) and side elevations more utilitarian in design and materials.

Music Building and Classroom Building #2 (Buildings 7 and 8). The Music Building and Classroom Building #2 were originally constructed in 1971 in the Mid-Century Modern/New Formalism style. Character-defining features include, low one-story massing, rectangular in plan oriented around landscaped courtyards/open spaces and a unified network of circulation corridors, defined by brick pavers and concrete walkways, sheltered walkways, and breezeways, symmetrical design composition, stacked-bond rusticated brick veneer, contrasting with smooth concrete on the full-height window surrounds, full-height window surrounds. Other character-defining features include exterior walls clad primarily in stacked-bond brick veneer, rusticated brick veneer, smooth concrete, and stucco, flat roof, stucco-clad boxed soffits, wide overhanging eaves, and a waffle-patterned fascia accenting the roofline, no window openings, the west elevation of Classroom Building #2 displays a series of full-height window surrounds, the fenestration design and configuration mirrors that of other contributing buildings, with projecting smooth concrete surrounds and rectangular windows. The buildings retain a high degree of physical integrity.

Adult School Office (Building 9). The Adult School Office was originally constructed in 1971 in the Mid-Century Modern/New Formalism style. Character-defining features include, low one-story massing, rectangular in plan oriented around landscaped courtyards/open spaces and a unified network of circulation corridors, defined by brick pavers and concrete walkways, sheltered walkways, and breezeways. Other character-defining features include symmetrical design composition, stacked-bond rusticated brick veneer, contrasting with smooth concrete on full-height, projecting window surrounds, bold roofline with wide overhanging eaves, exterior walls clad primarily in stacked-bond brick veneer, rusticated brick veneer, smooth concrete, and stucco, a flat roof, with a bold, boxed soffit and fascia scored to resemble masonry, wide overhanging eaves, roof eaves extended to create shelters for corridors, and corridor roofs resting on square concrete columns.

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Landscape Features. The site plan and landscape features of the Kennedy HS Historic District are critical to its ability to convey its significance. Most notable in this design is the siting of buildings, spatial relationships between buildings, neighboring courtyards and circulation corridors, sheltered walkways, breezeways, and landscaping. These areas are further defined and accentuated through the use of cantilevered sidewalks, formed concrete benches and other features, as well as masonry walls that use the same materials used for the buildings.

Impact Statements:

- a) **Would the project cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?**

A substantial adverse change in the significance of an historical resource means physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired. The significance of an historical resource is materially impaired when a project: Demolishes or materially alters in an adverse manner those physical characteristics that convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the CRHR or local register.

Archaeology

Less Than Significant Impact. The CHRIS records search identified three resources within a 0.5-mile (804 m) of the proposed Project site. Of these three resources, two are historical or have historical archaeological components. The Van Norman Reservoir Archeological district consists of nine prehistoric and multicomponent sites, which are sites that include both historical and prehistoric resources (P-19-175538). The second resource is the historic Bull Creek Extension Channel (P-19-190043). None of these resources intersect the proposed Project site. Due to the fact that no historical archaeological resources are present within the proposed Project site, the proposed Project would have a less-than-significant impact on historical archaeological resources and no resource specific mitigation is proposed.

Built Environment

Less Than Significant Impact. As summarized in this section, the Kennedy HS Historic District and its contributing elements are CEQA Historical Resources. LAUSD proposes to make Campus-wide renovations. The proposed Project would include building renovations, modernizations, seismic upgrade, and new construction on the Campus. Most of these upgrades are proposed to the interior of the buildings. The interiors of the Kennedy HS buildings are not considered CDFs of the contributing elements of the historic district and as such, these changes will have no impact on historical resources. However, other upgrades to the Kennedy HS building exteriors, as well as, site plan, and landscaping within the historic boundary could result in a substantial adverse change to CEQA historical resources. LAUSD has committed to implementing all proposed repairs and modifications to district-contributing buildings in conformance with the Secretary of the Interior Standards for Rehabilitation as detailed below. Under CEQA, a project that conforms to the Standards is generally a project that will have a less than significant impact on historical resources. LAUSD's commitment to conforming with the Standards will be enforced through use of the appropriate Standard Conditions developed as part of the Program EIR for the SUP.



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The Secretary of the Interior's Standards

Where a project has been determined to conform with the Standards, the project's impact on historical resources would be considered mitigated to below a level of significance and, thus, not significant (14 CCR 15126.4(b)(1)). In most cases, a project that demonstrates conformance with the Secretary of the Interior's Standards is categorically exempt from CEQA (14 CCR 15331), as described in the State CEQA Guidelines:

Where maintenance, repair, stabilization, rehabilitation, restoration, preservation, conservation or reconstruction of the historical resource will be conducted in a manner consistent with the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings (Weeks and Grimmer 1995), the project's impact on the historical resource shall generally be considered mitigated below a level of significance and thus is not significant (14 CCR 15126.4(b)(1)).

The Secretary of the Interior's Standards are a series of concepts focused on maintaining, repairing, and replacing historic materials, as well as designing new additions or making alterations. They function as common-sense historic preservation principles that promote historic preservation best practices. There are four distinct approaches that may be applied to the treatment of historical resources:

- **Preservation** focuses on the maintenance and repair of existing historic materials and retention of a property's form as it has evolved over time.
- **Rehabilitation** acknowledges the need to alter or add to a historic property to meet continuing or changing uses while retaining the property's historic character.
- **Restoration** depicts a property at a particular period of time in its history, while removing evidence of other periods.
- **Reconstruction** recreates vanished or non-surviving portions of a property for interpretive purposes.

The choice of treatment depends on a variety of factors, including the property's historical significance, physical condition, proposed use, and intended interpretation. The State CEQA Guidelines provide general design and technical recommendations to assist in applying the Standards to a specific property. Together, the Standards and Guidelines provide a framework that guides important decisions concerning proposed changes to a historic property.

The Standards for Rehabilitation

The Standards for Rehabilitation (below), taken together with the Guidelines, provide the framework in which proposed modifications should be reviewed.

- 1) A property will be used as it was historically or be given a new use that requires minimal change to its distinctive materials, features, spaces, and spatial relationships.
- 2) The historic character of a property will be retained and preserved. The removal of distinctive materials or alteration of features, spaces, and spatial relationships that characterize a property will be avoided.

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- 3) Each property will be recognized as a physical record of its time, place, and use. Changes that create a false sense of historical development, such as adding conjectural features or elements from other historic properties, will not be undertaken.
- 4) Changes to a property that have acquired historic significance in their own right will be retained and preserved.
- 5) Distinctive materials, features, finishes, and construction techniques or examples of craftsmanship that characterize a property will be preserved.
- 6) Deteriorated historic features will be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature will match the old in design, color, texture, and, where possible, materials. Replacement of missing features will be substantiated by documentary and physical evidence.
- 7) Chemical or physical treatments, if appropriate, will be undertaken using the gentlest means possible. Treatments that cause damage to historic materials will not be used.
- 8) Archeological resources will be protected and preserved in place. If such resources must be disturbed, mitigation measures will be undertaken.
- 9) New additions, exterior alterations, or related new construction will not destroy historic materials, features, and spatial relationships that characterize the property. The new work will be differentiated from the old and will be compatible with the historic materials, features, size, scale and proportion, and massing to protect the integrity of the property and its environment.
- 10) New additions and adjacent or related new construction will be undertaken in such a manner that, if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.

Implementation of SC-CUL-1, SC-CUL-2, SC-CUL-3, and SC-CUL-5, which provide processes to ensure the Project conforms to the Secretary of Interior's Standards for rehabilitation, will mitigate the proposed alternations to the Kennedy HS Historic District to a less-than-significant level. No mitigation or further study is required.

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

Less Than Significant Impact. The CHRIS records search identified three resources within the 0.5-mile (804 meters) records search buffer of the proposed Project site; however, none of these resources are within the proposed Project site. The resources include one groundstone and lithic scatter (P-19-000646), the Van Norman Reservoir Archeological district, which included nine prehistoric and multicomponent sites (P-19-175538), and the historic Bull Creek Extension Channel (P-19-190043). Additionally, historic aerials indicate that the proposed Project site has been extensively developed since 1970, including the development and redevelopment of the extant Kennedy HS. These developments included extensive demolition and ground disturbance activities. Prior to the development of Kennedy HS, the proposed Project site was used for agricultural purposes. Both the agricultural activities of the early twentieth century and the developments



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associated with Kennedy HS and adjacent residential subdivision would have likely heavily impacted and/or destroyed any archaeological resources within the site.

Although no archaeological resources were identified within the proposed Project site, there is always the potential to encounter unanticipated cultural resources during the course of construction. LAUSD has adopted five Standard Conditions (SC) of Approval that apply to archaeological resources, including, SC-CUL-6, SC-CUL-7, SC-CUL-8, SC-CUL-9, and SC-CUL-10. These conditions require that LAUSD retain a qualified archaeologist to be on call during construction, details protocols to be taken in the event that archaeological resources are identified, and requires cultural sensitivity training for all construction workers involved in ground disturbing activities. Implementation of these conditions would ensure that impacts to archaeological resources remain less-than-significant. No mitigation or further study is required.

c) Would the project disturb any human remains, including those interred outside of formal cemeteries?

Less Than Significant Impact. There is no indication that human remains are present within the boundaries of the proposed Project site. However, in the unlikely event that excavation activities inadvertently discover buried human remains, remains would be treated in accordance with existing regulatory requirements. Additionally, adherence to SC-CUL-10 would further ensure that potential impacts are less than significant in the event of an inadvertent discovery. In accordance with Section 7050.5 of the California Health and Safety Code, if human remains are found, the Los Angeles County Coroner shall be notified within 24 hours of the discovery. No further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains shall occur until the County Coroner has determined, within two working days of notification of the discovery, the appropriate treatment and disposition of the human remains. If the County Coroner determines that the remains are, or are believed to be, Native American, s/he shall notify the Native American Heritage Commission (NAHC) in Sacramento within 48 hours. In accordance with California Public Resources Code, Section 5097.98, the NAHC must immediately notify those persons it believes to be the Most Likely Descendant (MLD) of the deceased Native American. The MLD shall complete their inspection within 48 hours of being granted access to the site. The designated Native American representative would then determine, in consultation with the property owner, the disposition of the human remains. Therefore, impacts would be less than significant and no mitigation is required.

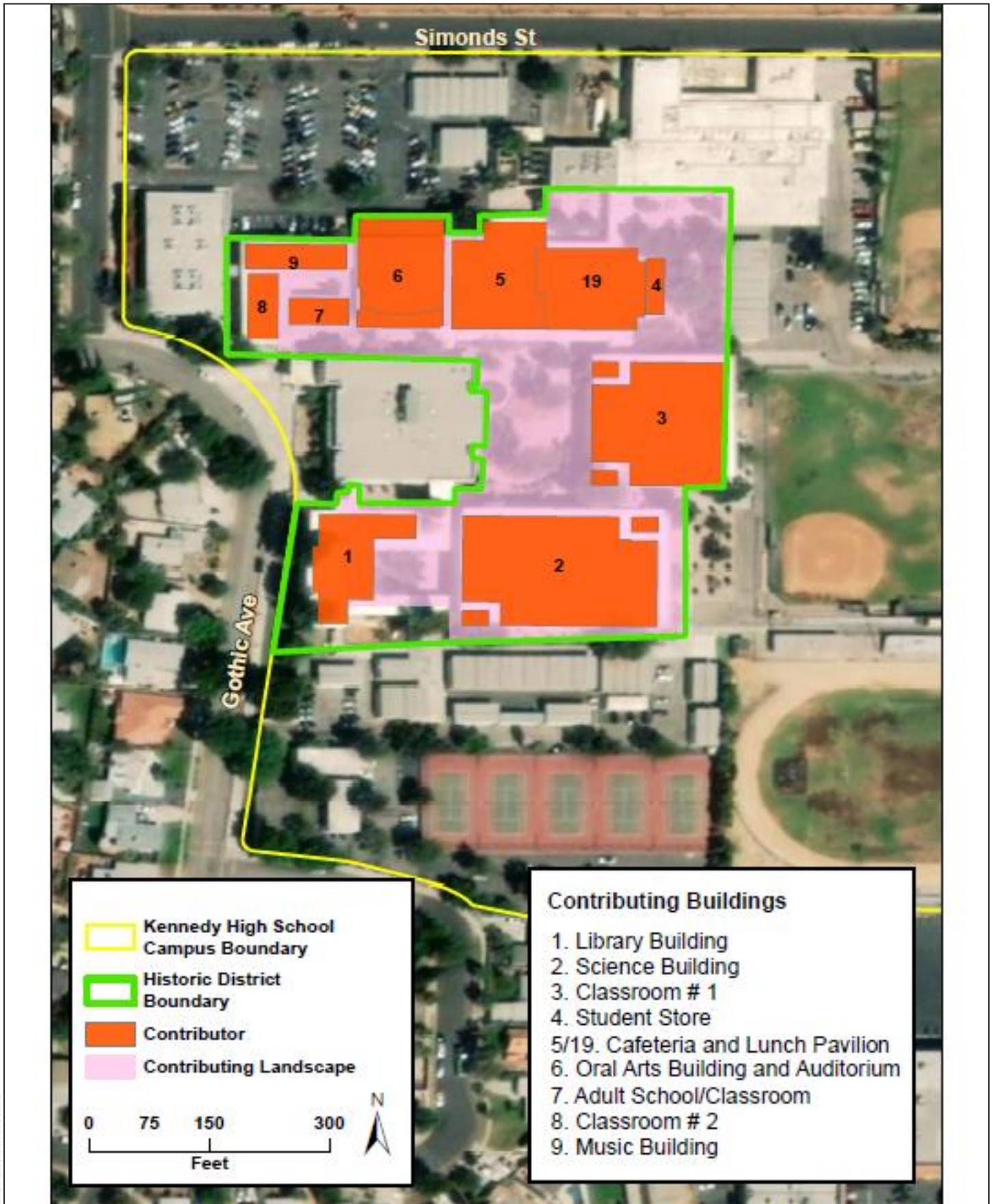
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SOURCE: Historic Resources Evaluation Report, Rincon Consultants, Inc., April 2018.

FIGURE 9

Kennedy High School Historic District Contributing Features Map

John F. Kennedy High School Comprehensive Modernization Project

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

Explanation:

The Program EIR contains air quality; greenhouse gas; and, utility and service system SCs that apply to energy conservation. Applicable SCs are included in the table below. Projects implemented under the SUP were determined in the Program EIR to result in less than significant impacts to energy.

LAUSD Standard Conditions of Approval

SC-AQ-2	Construction Contractor shall ensure that construction equipment is properly tuned and maintained in accordance with manufacturer's specifications, to ensure excessive emissions are not generated by unmaintained equipment.
SC-GHG-1	During operation, LAUSD shall perform regular preventative maintenance on pumps, valves, piping, and tanks to minimize water loss.
SC-GHG-2	LAUSD shall utilize automatic sprinklers set to irrigate landscaping during the early morning hours to reduce water loss from evaporation.
SC-GHG-3	LAUSD shall reset automatic sprinkler timers to water less during cooler months and rainy season.
SC-GHG-4	LAUSD shall develop a water budget for landscape (both non-recreational and recreational) and ornamental water use to conform to the local water efficient landscape ordinance. If no local ordinance is applicable, then use the landscape and ornamental budget outlined by the California Department of Water Resources.
SC-GHG-5	LAUSD shall ensure that the designed time dependent valued energy shall be at least 10 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.
SC-USS-1	<p>Consistent with current LAUSD requirements for recycling construction and demolition waste, the Construction Contractor shall implement the following solid waste reduction efforts during construction and demolition activities:</p> <p>School Design Guide. Establishes a minimum non-hazardous construction and demolition (C&D) debris recycling requirements of 75% by weight. Construction and demolition waste shall be recycled to the maximum extent feasible.</p> <p>Construction & Demolition Waste Management. This document outlines procedures for preparation and implementation, including reporting and documentation, of a Waste Management Plan for reusing, recycling, salvaging or disposal of non-hazardous waste materials generated during demolition and/or new construction to foster material recovery and re-use and to minimize disposal in landfills. Requires the collection and separation of all C&D waste materials generated on-site, reuse or recycling on-site, transportation to approved recyclers or reuse organizations, or transportation to legally designated landfills, for the purpose of recycling, salvaging and/or reusing a minimum of 75% of the C&D waste generated by weight.</p>

Source: LAUSD 2018.

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

Less than Significant Impact. The short-term construction and long-term operation of the proposed Project will require the consumption of energy resources in several forms at the Project site and within the Project area. An overview of the forms of energy consumption for construction and operation is provided as follows:

Construction Energy Consumption

- 1) Temporary Direct Electrical Service: Energy Provided by LADWP
 - Construction site lighting;
 - Computer equipment; and
 - Temporary construction trailer operation
- 2) Fossil Fuels (Diesel and Gasoline)
 - Off-road construction equipment
 - Worker vehicles, vendor trucks, and haul trucks

Operational Energy Consumption

- 1) Direct Energy Service: Natural Gas and Electrical Energy
 - Building heating, ventilation, and air-conditioning (HVAC)
 - Lighting: interior and exterior facilities
 - Computer, audio and video equipment; and
 - Appliances
- 2) Indirect Energy Consumption
 - Supply, distribution, and treatment of water, wastewater, and solid waste
- 3) Fossil Fuels (Diesel and Gasoline)
 - Employee, student, and visitor transportation

Construction and operational energy consumption is evaluated in detail below.



4. Environmental Checklist and Analysis

Construction

Electricity

Temporary electric power for as-necessary lighting and electronic equipment such as computers inside temporary construction trailers would be provided by LADWP. The electricity used for such activities would be temporary and would have a negligible contribution to the Project's overall energy consumption.

Natural Gas

Natural gas is not anticipated to be required during construction of the proposed Project. Fuels used for construction would primarily consist of diesel and gasoline, which are discussed below under the "petroleum" subsection. Any minor amounts of natural gas that may be consumed as a result of Project construction would have a negligible contribution to the Project's overall energy consumption.

Petroleum

Heavy-duty construction equipment associated with demolition and construction activities would rely on diesel fuel, as would haul and vendor trucks involved in delivery of materials to the Project site. Construction workers would travel to and from the Project site throughout the duration of construction. It is assumed in this analysis that construction workers would travel to and from the site in gasoline-powered light-duty vehicles.

Heavy-duty construction equipment of various types would be used during each phase of Project construction. Appendix B lists the assumed equipment usage for each phase of construction. The Project's construction equipment is estimated to operate a total combined 148,414 hours.

Fuel consumption from construction equipment was estimated by converting the total carbon dioxide (CO₂) emissions from each construction phase to gallons using the conversion factors for CO₂ to gallons of gasoline or diesel. Construction is estimated to occur in 2021 through 2026 based on the construction phasing schedule. The conversion factor for gasoline is 8.78 kilograms per metric ton CO₂ per gallon, and the conversion factor for diesel is 10.21 kilograms per metric ton CO₂ per gallon.⁶³ The estimated diesel fuel usage from construction equipment is shown in Table 13.

Table 13
Construction Equipment Diesel Demand

Phase	Pieces of Equipment	Equipment CO ₂ (MT)	Kg CO ₂ /Gallon	Gallons
Phase 1				
Demolition	6	154.12	10.21	15,094.85
Site Preparation	7	115.29	10.21	11,291.75
Building Construction	7	1,619.54	10.21	158,622.97
Phase 2				
Demolition	6	154.17	10.21	15,099.85

⁶³ The Climate Registry. 2018. Default Emission Factors. May 1. Accessed January 2019. <https://www.theclimateregistry.org/wp-content/uploads/2018/06/The-Climate-Registry-2018-Default-Emission-Factor-Document.pdf>.

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Table 13
Construction Equipment Diesel Demand

Phase	Pieces of Equipment	Equipment CO ₂ (MT)	Kg CO ₂ /Gallon	Gallons
Site Preparation	7	107.02	10.21	10,481.97
Building Construction	7	1,416.61	10.21	138,747.34
Paving	4	70.17	10.21	6,872.69
Total				356,211.42
Sources: Pieces of equipment and equipment CO ₂ (Appendix B); kg CO ₂ /Gallon (The Climate Registry 2018). ⁴⁹				
Notes: CO ₂ = carbon dioxide; MT = metric ton; kg = kilogram.				

Fuel consumption from worker, vendor, and haul truck trips are estimated by converting the total CO₂ emissions from each construction phase to gallons using the conversion factors for CO₂ to gallons of gasoline or diesel. Worker vehicles are assumed to be gasoline and vendor/hauling vehicles are assumed to be diesel. Calculations for total worker, vendor, and haul truck fuel consumption are provided in Tables 14, 15, and 16.

Table 14
Construction Worker Gasoline Demand

Phase	Trips	Vehicle MT CO ₂	Kg CO ₂ /Gallon	Gallons
Phase 1				
Demolition	1,200	5.87	8.78	668.26
Site Preparation	1,386	6.62	8.78	753.63
Building Construction	28,842	133.65	8.78	15,222
Phase 2				
Demolition	1,280	5.70	8.78	649.68
Site Preparation	1,280	5.70	8.78	649.68
Building Construction	90,968	386.65	8.78	44,037.29
Paving	1,106	4.57	8.78	520.85
Total				62,501.37
Sources: Trips and vehicle CO ₂ (Appendix B); kg CO ₂ /Gallon (The Climate Registry 2018). ⁴⁹				
Notes: MT = metric ton; CO ₂ = carbon dioxide; kg = kilogram.				



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Table 15
Construction Vendor Diesel Demand

Phase	Trips	Vehicle MT CO ₂	Kg CO ₂ /Gallon	Gallons
Phase 1				
Demolition	0	0	10.21	0
Site Preparation	0	0	10.21	0
Building Construction	11,286	135.11	10.21	13,232.71
Phase 2				
Demolition	0	0	10.21	0
Site Preparation	0	0	10.21	0
Building Construction	36,168	424.03	10.21	41,530.70
Paving	0	0	10.21	0
Total				54,763.41
Sources: Trips and vehicle CO ₂ (Appendix B); kg CO ₂ /Gallon (The Climate Registry 2018). ⁴⁹				
Notes: MT = metric ton; CO ₂ = carbon dioxide; kg = kilogram.				

Table 16
Construction Haul Truck Diesel Demand

Phase	Trips	Vehicle MT CO ₂	Kg CO ₂ /Gallon	Gallons
Phase 1				
Demolition	26	0.99	10.21	96.85
Site Preparation	2,660	100.35	10.21	9,828.89
Building Construction	0	0	10.21	0
Phase 2				
Demolition	90	53.1	10.21	5,195.97
Site Preparation	1,384	49.81	10.21	4,878.72
Building Construction	0	0	10.21	0
Paving	0	0	10.21	0
Total				20,000.43
Sources: Trips and vehicle CO ₂ (Appendix B); kg CO ₂ /Gallon (The Climate Registry 2018). ⁴⁹				
Notes: MT = metric ton; CO ₂ = carbon dioxide; kg = kilogram.				

In summary, construction of the Project is conservatively anticipated to consume 62,501 gallons of gasoline and 430,975 gallons of diesel over a period of approximately 60 months. By comparison, California's consumption of petroleum is approximately 74.8 million gallons per day, which would equate to approximately 18.5 billion gallons of petroleum consumed in California over the course of the Project construction period.⁶⁴

⁶⁴ EIA (U.S. Energy Information Administration). 2017. California Profile Data. Updated October 19, 2017. Accessed December 2018. <https://www.eia.gov/state/data.php?sid=CA#ConsumptionExpenditures>.

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Additionally, per SC-AQ-2, the construction Contractor shall ensure that construction equipment is properly tuned and maintained throughout construction, which would further ensure that excessive energy expenditures do not occur. Therefore, the Project would result in a minimal increase in petroleum fuel consumption and impacts associated during construction would be less than significant. No mitigation or further study is required.

Operation

The proposed Project includes seismic safety retrofits to many existing buildings and removal and replacement of portable buildings with a new permanent classroom (net decrease in building area), ADA improvements, and other maintenance and utility improvements. The remodeling activities would not increase classroom or building occupancy capacities or uses. Replacement of portable buildings with a new permanent classroom will result in a net decrease in building area. Therefore the Project is not anticipated to change daily traffic and peak hour trips relative to existing school activities. Furthermore, the proposed Project is required to comply with specific design standards and sustainable building practices including the CHPS criteria. CHPS has established criteria for the development of high-performance schools to create a better educational experience for students and teachers by designing the best facilities possible. CHPS-designed facilities are healthy, comfortable, energy efficient, material efficient, easy to maintain and operate, commissioned, environmentally responsive site, a building that teaches, safe and secure, community resource, stimulating architecture, and adaptable to changing needs. The proposed Project would comply with CHPS and LAUSD sustainability guidelines. The design team would be responsible for implementing SC-GHG-1 through SC-GHG-5 and SC-USS-1, which include sustainability features for the proposed Project, such as onsite treatment of stormwater runoff, “cool roof” building materials, lighting that reduces light pollution, water and energy-efficient design, water-wise landscaping, collection of recyclables, and sustainable and/or recycled-content building materials.

Electricity

Operation of the Project upon buildout would require electricity for multiple purposes, including cooling, lighting, appliances, and various equipment. Additionally, the supply, conveyance, treatment, and distribution of water and wastewater would indirectly result in electricity usage. However, the proposed Project would not result in an increase electricity use from the current operation, as it would not increase classroom or building occupancy capacities or uses. For this reason, the electricity consumption of the Project would not be considered inefficient or wasteful, and impacts would be less than significant.

Natural Gas

Project operation would require natural gas for various purposes, including water heating and natural gas appliances. However, the proposed Project would not result in an increase natural gas use from the current operation, as it would not increase classroom or building occupancy capacities or uses. For this reason, the natural gas consumption of the Project would not be considered inefficient or wasteful, and impacts would be less than significant.

Petroleum

During operations, the majority of fuel consumption resulting from the Project would involve the use of motor vehicles traveling to and from the school, as well as fuels used for alternative modes of transportation that may be used by students and employees. Since the Project is not anticipated to change daily traffic and peak hour trips relative to existing school activities, petroleum consumption associated with the Project would not be considered inefficient or wasteful and would result in a less-than-significant impact. No mitigation or further study is required.



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

Less than Significant Impact. Part 6 of Title 24 of the California Code of Regulations was established in 1978 and serves to enhance and regulate California's building standards. Part 6 establishes energy efficiency standards for residential and non-residential buildings constructed in California to reduce energy demand and consumption. Part 6 is updated periodically (every 3 years) to incorporate and consider new energy efficiency technologies and methodologies. Title 24 also includes Part 11, the California Green Building Standards Code (CALGreen). CALGreen institutes mandatory minimum environmental performance standards for all ground-up, new construction of commercial, low-rise residential, and state-owned buildings, as well as schools and hospitals. The 2016 CALGreen standards became effective on January 1, 2017. The proposed Project would meet Title 24 and CALGreen standards to reduce energy demand and increase energy efficiency.

The City of Los Angeles adopted a Sustainable City Plan in 2015, and updated the plan in 2019, with the L.A.'s Green New Deal, Sustainable City Plan. The Green New Deal identifies the following renewable energy and efficiency targets:

Chapter: Renewable Energy:

- LADWP will supply 55% renewable energy by 2025; 80% by 2036; and 100% by 2045
- Demand response (DR) programs to 234 MW (2025) and 600 MW (2035)
- Increase cumulative MW by 2025; 2035; and 2050 of:
 - Local solar to 900-1,500 MW; 1,500-1,800 MW; and 1,950 MW Energy
 - storage capacity to 1,654-1,750 MW; 3,000 MW; and 4,000 MW

Chapter: Lead by Example:

- Reduce municipal greenhouse gas emissions 55% by 2025; 65% by 2035; and reach carbon neutral by 2045
- Reduce municipal energy use by 18% by 2025; 35% by 2035; and 44% by 2050
- Reduce municipal water use by at least 25% by 2025; and 30% by 2035
- Lead on zero waste and achieve a zero waste City Hall by 2025
- Convert all City fleet vehicles to zero emission where technically feasible by 2028
- Ensure all new municipally owned buildings and major renovations will be all-electric, effective immediately
- Reach 2 million Angelenos through outreach, education, and training programs by 2025

The proposed Project would not conflict with the City's Green New Deal, would comply with CHPS and LAUSD sustainability guidelines, and would not conflict with existing energy standards and regulations. Furthermore, the proposed Project would implement the energy efficiency measures outlined in SC-AQ-2; SC-GHG-1 through SC-GHG-5; and, SC-USS-1; therefore, impacts during construction and operation of the proposed Project would be less than significant. No mitigation or further study is required.

4. Environmental Checklist and Analysis

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

Explanation:

The analyses in this section are supported by information provided in the Preliminary Geotechnical Evaluation Comprehensive Modernization at Kennedy High School (Geotechnical Report), prepared by Gorian and Associates Inc. in June 2017, and included herein as Appendix E. The Geotechnical Report contains geotechnical construction recommendations that would be adhered to as a condition of Project implementation. Projects implemented under the SUP were determined in the Program EIR to result in less than significant impacts to geology and soils. With implementation of the construction recommendations, the proposed Project would have a less than significant impact on geology and soils.

LAUSD has one SC for minimizing impacts to geology and soils, as well as three SCs relating to hydrology and water quality and one SC relating to cultural resources, that are applicable to geology and soils:



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LAUSD Standard Conditions of Approval	
SC-GEO-1	LAUSD shall prepare a Geohazard Assessment for the construction of any new school or applicable school addition.
SC-HWQ-1	<p>LAUSD shall design and construct the project to meet or exceed the current and applicable stormwater guidelines.</p> <p>Stormwater Technical Manual</p> <p>This manual establishes design requirements and provides guidance for the cost-effective improvement of water quality in new and significantly redeveloped LAUSD school sites. These guidelines are intended to improve water quality and mitigate potential impacts to the Maximum Extent Practicable (MEP). These guidelines meet current post-construction Standard Urban Stormwater Mitigation Plan (SUSMP) and the mandated post-construction element of the NPDES program requirements.</p>
SC-HWQ-2	<p>LAUSD shall implement the applicable stormwater requirements during construction activities.</p> <p>Compliance Checklist for Storm Water Requirements at Construction Sites</p> <p>This checklist has requirements for compliance with the General Construction Activity Permit and is used by OEHS to evaluate permit compliance. Requirements listed include a SWPPP; BMPs for minimizing storm water pollution to be specified in a SWPPP; and monitoring storm water discharges to ensure that sedimentation of downstream waters remains within regulatory limits.</p>
SC-HWQ-3	<p>LAUSD shall implement the following programs and procedures, as applicable:</p> <ul style="list-style-type: none"> • Environmental Training Curriculum – a qualified environmental Monitor shall provide a worker’s environmental awareness program that is prepared by LAUSD for the project. • Hazardous Waste Management Program (Environmental Compliance/Hazardous Waste). • Medical Waste Management Program. • Environmental Compliance Inspections. • Safe School Inspection Program. • Integrated Pest Management Program. • Fats Oil and Grease Management Program. • Solid Waste Management Program. • Other related programs overseen by OEHS.
SC-CUL-11	<p>LAUSD shall retain a Paleontological Monitor to oversee specific ground-disturbing activities as determined by the scope of work and final grading plan. The Monitor shall provide the construction crew(s) with a brief summary of the sensitivity, the rationale behind the need for protection of these resources, and information on the initial identification of paleontological resources.</p> <p>If paleontological resources are uncovered, the Construction Contractor shall halt construction activities within a 30-foot radius of the find and shall notify the LAUSD.</p> <ul style="list-style-type: none"> • Ground-disturbing activities shall not continue until the discovery has been assessed by the Paleontologist. • The paleontologist shall have the authority to halt construction activities to allow a reasonable amount of time to identify potential resources. • Significant resources found shall be curated as determined necessary by the Paleontologist.

Given its location in Southern California, the Project site is within a seismically active region. The Project site is in the north central portion of the San Fernando Valley, an east trending structural trough within the Transverse Ranges geomorphic province of Southern California. This geomorphic province is dominated by active compressional tectonics (crustal shortening) and is characterized by east west trending ranges and ridges with intervening canyons and valleys. The San Fernando Valley has been filled from the sides with sediments from drainages of the San Gabriel Mountains (mainly) and Santa Susana Mountains to the north, the Santa Monica Mountains to the south, and the Simi Hills and Verdugo Mountains to the west and east, respectively.

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Being on the north central portion of the Valley, the Project site is on a broad apron of alluvial fans deposited at the mouths of drainages of the Santa Susana and San Gabriel Mountains north of the Project site.

The Project site is underlain, to the maximum depth explored of 51.5 feet below ground surface level (bgs), by native soils referred to as alluvial fan deposits (Holocene). The alluvial fan deposits are locally mantled with artificial fill, grass, and pavement. Groundwater at the Project site was not encountered at 51.5 feet; however, historically high groundwater at the Project site has been noted at depths ranging from 170-200 feet bgs.

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

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

Less than Significant Impact. Surface fault rupture occurs when movement on a fault deep within the earth breaks through the surface. Ground surface fault rupture may also accompany fault creep or natural or man-induced subsidence. Fault rupture can cause structural damage and safety risks on and near the rupture. The hazard of fault-rupture is generally thought to be associated with a relatively narrow zone along well-defined pre-existing active or potentially active faults. According to the Geotechnical Report prepared for the Project, no active faults are known to cross the Project site, and the Project site is not within an Alquist-Priolo Earthquake Fault Zone. The concealed surficial trace of the late Pleistocene to possibly Holocene Mission Hills fault is located approximately 0.2 mile north of the northern site boundary, while the closest historically active fault is the San Fernando fault, which is located approximately 0.3 mile north of the Project site. The active Verdugo fault is approximately 12 miles southeast of the site and the active Simi-Santa Rosa Fault Zone lies approximately 14 miles west of the site. Given that the Project site is not located on an active fault, the potential for ground rupture on site due to faulting during the life expectancy of the Project is considered remote and the risk of loss, injury, or death involving rupture of a known earthquake fault would be less than significant. No mitigation or further study is required.

ii. Strong seismic ground shaking?

Less than Significant Impact. Although no active faults are known to exist on the Project site, the area has high potential to be subject to strong seismic ground shaking from regional earthquakes, as does most of California. However, implementation of the proposed Project would not exacerbate the potential for strong seismic ground shaking, and with adherence to the recommendations in the Geotechnical Report and to Title 24 of the California Building Code, any potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking would be less than significant. No mitigation or further study is required.

iii. Seismic-related ground failure, including liquefaction?

Less than Significant Impact. Seismic-related ground failure can include hazards such as liquefaction, earthquake-induced landslides, and seismically induced settlement. Liquefaction is a seismic phenomenon



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in which saturated soils with low cohesion (sands) lose strength when severely shaken during an earthquake and develop excess water pore pressures. According to the Geotechnical Report (Appendix E), the Project site is not located in an area susceptible to liquefaction or lateral spreading. Furthermore, Project construction and operation would not increase the probability or exacerbate the potential for liquefaction to occur at the Project site. Given this, liquefaction would not pose a substantial adverse risk at the Project site and impacts as a result of seismic-related ground failure, including liquefaction, would be considered less than significant. No mitigation or further study is required.

iv. Landslides?

No Impact. Seismic-related ground failure can include hazards such as liquefaction, earthquake-induced landslides, and seismically induced settlement. Landslides are commonly associated with the movement of a mass of rock, debris, or earth down a slope.⁶⁵ Given the relatively flat Project site, seismically induced landslides would not pose a substantial adverse risk at the Project site, including the risk of loss, injury, or death. Furthermore, project construction and operation would not increase the probability or exacerbate the potential for landslides to occur at the Project site. No impact would occur. No mitigation or further study is required.

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

Less than Significant Impact. Due to the relatively flat topography of the Project site, the potential for significant soil erosion is not considered high under existing conditions. However, construction-related activities such as grading and excavation would result in surface disruption that would exacerbate the potential for soil erosion to occur. The proposed Project would be subject to SCs under the SUP, including SC-HWQ-1 through SC-HWQ-4, which outline requirements such as implementation of a Stormwater Pollution Prevention Plan (SWPPP) and the requirements of a General Construction Activity National Pollution Discharge Elimination System (NPDES) permit, both of which would include standard erosion control measures. Adherence to the above-mentioned regulations, and implementation of SC-HWQ-1 through SC-HWQ-3, would reduce the potential for substantial soil erosion or the loss of topsoil to a less-than-significant level. No mitigation or further study is required.

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

Less than Significant Impact. The site is underlain, to the maximum depth explored of 51.5 feet bgs, by native soils referred to as alluvial fan deposits (Holocene). The alluvial fan deposits are locally mantled with artificial fill, grass, and pavement. Groundwater at the Project site was not encountered at 51.5 feet; however, historically high groundwater has been noted at depths ranging from 170-200 feet bgs. As stated above in section VII(a)(iii) and (iv), implementation of the Project would not pose a substantial adverse risk at the Project site, including the risk

⁶⁵ U.S. Geological Survey. 2019. Natural Hazards. Accessed, May 10, 2019. https://www.usgs.gov/faqs/what-a-landslide-and-what-causes-one?qt-news_science_products=0#qt-news_science_products.

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of loss, injury, or death as a result of liquefaction and landslides. Additionally, due to the flat nature of the site and vicinity, and without adjacent sloping free faces, the potential for lateral spreading is negligible.

All buildings settle immediately after construction, and may continue to settle over the life of the Project. Minor wall or slab cracking may also be associated with settlement or expansive soil movement. Wall cracking can also occur associated with expansion and contraction of structural wood members due to thermal or moisture changes. Settlement or soil movement could occur if the soils become saturated due to excessive water infiltration generally caused by excessive irrigation, poor drainage, etc. Seismically induced settlement potential, in the form of dry sand settlement, was evaluated at the Project site. For seismic settlement evaluations, a ground motion with a two percent chance of being exceeded in 50 years was utilized.⁶⁶ The peak ground acceleration in accordance with Section 11.8.3 of the American Society of Civil Engineers, Minimum Design Loads and Associated Criteria for Buildings and Other Structures Manual (ASCE-7 of the International Building Code) is 0.88grams (g). These parameters yielded seismically induced settlement estimations of approximately 0.5 inches to 1.75 inches (see Appendix E for details), while lower seismically induced settlement was obtained from the western-most exploration points on the Project site where silty clay soils are present. Given that differential seismic settlement is typically anticipated to be one-half to two-thirds of the total seismic settlement, the estimated differential seismic settlement would be approximately 0.5 inch to 1 inch. With implementation of the recommendations outlined in the Geotechnical Report (Appendix E), impacts as a result of seismically-induced settlement would be less than significant.

According to the Geotechnical Report, consolidation testing of the underlying soils indicated that the potential for hydro-collapse of the underlying soils to a depth of 50 feet below the existing ground surface is low.

Given the above, and with implementation of the recommendations provided in the Geotechnical Report and with adherence to the California Building Code, the proposed Project would not 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. Impacts would be less than significant. No mitigation or further study is required.

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

Less than significant Impact. Expansive soil is soil that expands significantly upon wetting and shrinks upon drying, generally due to a high clay particle content. Significant soil expansion can prove hazardous, because damage to buildings' foundations may occur. Soil expansion tests performed on soils obtained from the Project site indicate that underlying materials have a low to medium expansion potential. However, with implementation of the recommendations outlined in the Geotechnical Report and with adherence to Title 24 of the California Building Code, impacts would be reduced to a less-than-significant level. No mitigation or further study is required.

⁶⁶ Seismic settlement evaluations were based on recommendations by the 2013 California Building Code and International Building Code.



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

No Impact. The Project site is served by the existing municipal sewer system within the Knollwood Area Sewer System.⁶⁷ No septic tanks are proposed under the Project. Given this, no impact would occur as a result of 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 mitigation or further study is required.

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

Less than Significant Impact. The Project area is located within sedimentary deposits of the San Fernando Valley of Los Angeles County, south of the Van Norman Lake Reservoir and southwest of the San Gabriel Mountains.⁶⁸ These deposits are composed of a thick sequence of marine and alluvial sedimentary deposits ranging in age from the early Miocene (~24 million years old [Ma]) to the present.⁶⁹

The entire Project area is underlain by Quaternary alluvium, according to published mapping by Dibblee and Ehrenspeck (1991) at a 1:24,000 scale. These Holocene (less than ~ 11,700 years old), or recent, alluvial fan deposits are comprised of loose silt, sand, and gravel derived from the Santa Susana Mountains to the northwest (McLeod 2019).⁷⁰ Older alluvial deposits that are Pleistocene in age (“Ice Age” deposits, ~2.58 Ma to 11,700 years old) presumably underlie the younger alluvial deposits at depth.⁵⁶

Although no fossils have been recorded from within the Project area itself, construction-related activities in nearby locations have uncovered multiple paleontological resources at depths of three to 100 feet bgs (see Appendix E for details). No paleontological resources were identified within the Project area as a result of the institutional records search or desktop geological review. Furthermore, the Project area is located within an area that has been previously developed and is likely underlain by fill materials, at least in part. As such, the Project area is not anticipated to be underlain by unique geologic features. While this local area has been heavily disturbed by urban development over the years, intact paleontological resources may be present below the original layer of fill material. If intact paleontological resources are located onsite, ground-disturbing activities associated with construction of the Project, such as grading during site preparation, have the potential to destroy a unique paleontological resource or site. As such, the Project area is considered to be potentially sensitive for paleontological resources and without mitigation, the potential damage to paleontological resources during construction associated with the Project is considered a potentially significant impact. Given the proximity of past fossil discoveries in the surrounding area and potential for underlying, Pleistocene-age older alluvial deposits, the Project area is highly sensitive for supporting paleontological resources below the depth of fill and recent Quaternary alluvium. However, with

⁶⁷ City of Los Angeles. 2019. GeoHub Sewer System. Accessed, May 15, 2019. <https://data.lacity.org/A-Livable-and-Sustainable-City/Sewer-System/7aty-5ywx>

⁶⁸ Dibblee, T.W. and H.E., Ehrenspeck, ed. 1991. Geologic map of the San Fernando and Van Nuys (north 1/2) quadrangles, Los Angeles County, California: Dibblee Geological Foundation, Dibblee Foundation Map DF-33, scale 1:24,000. Accessed, May 15, 2019. https://ngmdb.usgs.gov/Prodesc/proddesc_217.htm.

⁶⁹ Yerkes, R.F., T.H. McCulloch, J.E. Schoellhamer, and J.G. Vedder. 1965. Geology of the Los Angeles Basin, California-an introduction: U.S. Geological Survey Professional Paper 420-A, 57 pp.

⁷⁰ McLeod, S.A. 2019. Vertebrate Paleontology Records Check for Paleontological Resources for the Proposed LAUSD Kennedy High School Modernization Project, Dudek Project #10319.01, in Granada Hills, Los Angeles County, Project Area. Unpublished Records Search Results Letter from the Natural History Museum of Los Angeles County, Los Angeles, California.

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implementation of SC-CUL-11, which requires that a Paleontological Monitor be retained to oversee specific ground-disturbing activities, potential impacts to paleontological resources would be reduced to a less-than-significant level. No mitigation or further study is required.



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

Explanation:

The analyses in this section are supported by estimations generated by CalEEMod, as well as by information taken from the following sources: The California Air Pollution Control Officers Association (CAPCOA); the SCAQMD; the CARB; and, the Intergovernmental Panel on Climate Change (IPCC).

LAUSD has SCs for minimizing impacts to greenhouse gas emissions; applicable SCs related to greenhouse gas emissions impacts associated with the proposed Project are included below.

LAUSD Standard Conditions of Approval

SC-AQ-2	Construction Contractor shall ensure that construction equipment is properly tuned and maintained in accordance with manufacturer's specifications, to ensure excessive emissions are not generated by unmaintained equipment.
SC-GHG-1	During operation, LAUSD shall perform regular preventative maintenance on pumps, valves, piping, and tanks to minimize water loss.
SC-GHG-2	LAUSD shall utilize automatic sprinklers set to irrigate landscaping during the early morning hours to reduce water loss from evaporation.
SC-GHG-3	LAUSD shall reset automatic sprinkler timers to water less during cooler months and rainy season.
SC-GHG-4	LAUSD shall develop a water budget for landscape (both non-recreational and recreational) and ornamental water use to conform to the local water efficient landscape ordinance. If no local ordinance is applicable, then use the landscape and ornamental budget outlined by the California Department of Water Resources.
SC-GHG-5	LAUSD shall ensure that the designed time dependent valued energy shall be at least 10 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.
SC-USS-1	<p>Consistent with current LAUSD requirements for recycling construction and demolition waste, the Construction Contractor shall implement the following solid waste reduction efforts during construction and demolition activities:</p> <p>School Design Guide. Establishes a minimum non-hazardous construction and demolition (C&D) debris recycling requirements of 75% by weight. Construction and demolition waste shall be recycled to the maximum extent feasible.</p> <p>Construction & Demolition Waste Management. This document outlines procedures for preparation and implementation, including reporting and documentation, of a Waste Management Plan for reusing, recycling, salvaging or disposal of non-hazardous waste materials generated during demolition and/or new construction to foster material recovery and re-use and to minimize disposal in landfills. Requires the collection and separation of all C&D waste materials generated on-site, reuse or recycling on-site, transportation to approved recyclers or reuse organizations, or transportation to legally designated landfills, for the purpose of recycling, salvaging and/or reusing a minimum of 75% of the C&D waste generated by weight.</p>

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Source: LAUSD 2018.

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

Less than Significant Impact. Climate change refers to any significant change in measures of climate (e.g., temperature, precipitation, or wind patterns) lasting for an extended period of time (i.e., decades or longer). The Earth's temperature depends on the balance between energy entering and leaving the planet's system, and many factors (natural and human) can cause changes in Earth's energy balance. The greenhouse effect is the trapping and buildup of heat in the atmosphere near the Earth's surface (the troposphere). The greenhouse effect is a natural process that contributes to regulating the Earth's temperature, and it creates a livable environment on Earth. Human activities that emit additional GHGs to the atmosphere increase the amount of infrared radiation that gets absorbed before escaping into space, thus enhancing the greenhouse effect and causing the Earth's surface temperature to rise. Global climate change is a cumulative impact; a project contributes to this impact through its incremental contribution combined with the cumulative increase of all other sources of GHGs. Thus, GHG impacts are recognized exclusively as cumulative impacts.⁷¹

A GHG is any gas that absorbs infrared radiation in the atmosphere; in other words, GHGs trap heat in the atmosphere. As defined in California Health and Safety Code Section 38505(g) for purposes of administering many of the state's primary GHG emissions reduction programs, GHGs include carbon dioxide (CO₂), methane (CH₄), nitrous oxide (N₂O), hydrofluorocarbons, perfluorocarbons, sulfur hexafluoride, and nitrogen trifluoride (see also CEQA Guidelines Section 15364.5). The three GHGs evaluated herein are CO₂, CH₄, and N₂O because these are the only GHG gases that would be emitted during proposed Project construction and operations.

The IPCC developed the global warming potential (GWP) concept to compare the ability of each GHG to trap heat in the atmosphere relative to another gas. The reference gas used is CO₂; therefore, GWP-weighted emissions are measured in metric tons (MT) of CO₂ equivalent (CO₂e). Consistent with CalEEMod Version 2016.3.2, this GHG emissions analysis assumed the GWP for CH₄ is 25 (i.e., emissions of 1 MT of CH₄ are equivalent to emissions of 25 MT of CO₂), and the GWP for N₂O is 298, based on the IPCC's Fourth Assessment Report.⁷²

As discussed in Section III, Air Quality, the proposed Project is located within the jurisdictional boundaries of the SCAQMD. In October 2008, the SCAQMD proposed recommended numeric CEQA significance thresholds for GHG emissions for lead agencies to use in assessing GHG impacts of residential and commercial development projects as presented in its Draft Guidance Document—Interim CEQA Greenhouse Gas (GHG) Significance Threshold.⁷³ This document, which builds on the previous guidance prepared by the California Air Pollution Control Officers Association (CAPCOA), explored various approaches for establishing a significance threshold for GHG emissions. The draft interim CEQA thresholds guidance document was not adopted or

⁷¹ CAPCOA (California Air Pollution Control Officers Association). 2008. CEQA & Climate Change: Evaluating and Addressing Greenhouse Gas Emissions from Projects Subject to the California Environmental Quality Act. January 2008.

⁷² IPCC (Intergovernmental Panel on Climate Change). 2007. IPCC Fourth Assessment Synthesis of Scientific-Technical Information Relevant to Interpreting Article 2 of the U.N. Framework Convention on Climate Change.

⁷³ SCAQMD (South Coast Air Quality Management District). 2008. Draft Guidance Document – Interim CEQA Greenhouse Gas (GHG) Significance Threshold. October 2008.



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approved by the Governing Board. However, in December 2008, the SCAQMD adopted an interim 10,000 MT CO₂e per-year screening level threshold for stationary source/industrial projects for which the SCAQMD is the lead agency.⁷⁴ The 10,000 MT CO₂e per-year threshold, which was derived from GHG reduction targets established in Executive Order S-3-05, was based on the conclusion that the threshold was consistent with achieving an emissions capture rate of 90% of all new or modified stationary source projects.

The SCAQMD formed a GHG CEQA Significance Threshold Working Group to work with SCAQMD staff on developing GHG CEQA significance thresholds until statewide significance thresholds or guidelines are established. From December 2008 to September 2010, the SCAQMD hosted working group meetings and revised the draft threshold proposal several times, although it did not officially provide these proposals in a subsequent document. The SCAQMD has continued to consider adoption of significance thresholds for residential and general land use development projects. The most recent proposal issued by SCAQMD, issued in September 2010, uses the following tiered approach to evaluate potential GHG impacts from various uses.⁷⁴

Tier 1. Determine if CEQA categorical exemptions are applicable. If not, move to Tier 2.

Tier 2. Consider whether or not the proposed project is consistent with a locally adopted GHG reduction plan that has gone through public hearing and CEQA review, that has an approved inventory, includes monitoring, etc. If not, move to Tier 3.

Tier 3. Consider whether the project generates GHG emissions in excess of screening thresholds for individual land uses. The 10,000 MT CO₂e per-year threshold for industrial uses would be recommended for use by all lead agencies. Under option 1, separate screening thresholds are proposed for residential projects (3,500 MT CO₂e per year), commercial Projects (1,400 MT CO₂e per year), and mixed-use Projects (3,000 MT CO₂e per year). Under option 2, a single numerical screening threshold of 3,000 MT CO₂e per year would be used for all non-industrial Projects. If the Project generates emissions in excess of the applicable screening threshold, move to Tier 4.

Tier 4. Consider whether the Project generates GHG emissions in excess of applicable performance standards for the Project service population (population plus employment). The efficiency targets were established based on the goal of Assembly Bill (AB) 32 to reduce statewide GHG emissions to 1990 levels by 2020. The 2020 efficiency targets are 4.8 MT CO₂e per-service population for Project-level analyses and 6.6 MT CO₂e per-service population for plan-level analyses. If the Project generates emissions in excess of the applicable efficiency targets, move to Tier 5.

Tier 5. Consider the implementation of CEQA mitigation (including the purchase of GHG offsets) to reduce the Project efficiency target to Tier 4 levels.

To determine the proposed Project's potential to generate GHG emissions that would have a significant impact on the environment, its GHG emissions were compared to the SCAQMD recommended non-industrial Projects quantitative threshold of 3,000 MT CO₂e per year.

⁷⁴ SCAQMD. 2010. Greenhouse Gas CEQA Significance Threshold Stakeholder Working Group Meeting #15. September 28, 2010. [http://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-\(ghg\)-ceqa-significance-thresholds/year-2008-2009/ghg-meeting-15/ghg-meeting-15-main-presentation.pdf?sfvrsn=2](http://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-(ghg)-ceqa-significance-thresholds/year-2008-2009/ghg-meeting-15/ghg-meeting-15-main-presentation.pdf?sfvrsn=2).

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Construction Emissions

Construction of the proposed Project would result in GHG emissions, which are primarily associated with use of off-road construction equipment, on-road vendor trucks, and worker vehicles. The SCAQMD recommends that “construction emissions be amortized over a 30-year Project lifetime, so that GHG reduction measures will address construction GHG emissions as part of the operational GHG reduction strategies.”⁵⁹ Thus, the total construction GHG emissions were calculated, amortized over 30 years, and added to the total operational emissions for comparison with the GHG significance threshold of 3,000 MT CO_{2e} per year. The determination of significance, therefore, is addressed in the operational emissions discussion following the estimated construction emissions.

CalEEMod was used to calculate the annual GHG emissions based on the construction scenario described in Section 3.2.4, construction of the proposed Project is anticipated to commence in November 2021 lasting a total of 60 months. On-site sources of GHG emissions include off-road equipment and off-site sources including haul trucks, vendor trucks, and worker vehicles. Table 17 presents construction GHG emissions for the proposed Project from 2021 through 2026 from on-site and off-site emission sources.

Table 17
Estimated Annual Construction GHG Emissions

Year	CO ₂	CH ₄	N ₂ O	CO _{2e}
	Metric Tons per Year			
2021 (Phase 1)	106.24	0.018	0	106.69
2022 (Phase 1)	906.09	0.199	0	911.05
2023 (Phase 1)	933.16	0.215	0	938.54
2024 (Phase 1 + Phase 2)	849.86	0.174	0	854.21
2025 (Phase 2)	1,268.49	0.228	0	1,274.20
2026 (Phase 2)	810.56	0.156	0	814.45
Total				4,899.14
Amortized Over 30 Years				163.30
Source: See Appendix B for complete results.				
Notes: GHG = greenhouse gas; CO ₂ = carbon dioxide; CH ₄ = methane; N ₂ O = nitrous oxide; CO _{2e} = carbon dioxide equivalent.				

As shown in Table 17, the estimated total GHG emissions during construction of the proposed Project would be approximately 4,900 MT CO_{2e}. Estimated Project-generated construction emissions amortized over 30 years would be approximately 163 MT CO_{2e} per year. As with Project-generated construction air quality pollutant emissions, GHG emissions generated during construction of the proposed Project would be short-term in nature, lasting only for the duration of the construction period, and would not represent a long-term source of GHG emissions. Because there is no separate GHG threshold for construction, the evaluation of significance is discussed in the operational emissions analysis in the following text.



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Operational Emissions

CalEEMod was used to estimate potential Project-generated operational GHG emissions from vehicular sources, area sources (natural gas combustion and landscape maintenance), electrical generation (including electrical generation associated with water supply and wastewater treatment), and solid waste. Emissions from each category—area sources, energy sources, mobile sources, solid waste, and water supply and wastewater treatment—is discussed in the following text with respect to the proposed Project. Operational year 2027 was assumed to be the first full year of operation following completion of construction.

As discussed previously, the proposed Project includes seismic safety retrofits to many existing buildings and removal and replacement of portable buildings with a new permanent classroom (net decrease in building area), ADA improvements, and other maintenance and utility improvements. These proposed Project activities would not increase classroom or building occupancy capacities or uses and would not change the existing traffic rates and patterns. Nevertheless, to conservatively estimate the net GHG emissions change as a result of the Project, CalEEMod was used to calculate the annual GHG emissions associated with the operation of the existing buildings proposed for demolition (23,530 square feet) and, separately, the new classroom building (20,581 square feet) and new asphalt.

Area Sources

CalEEMod land use default values were used to estimate GHG emissions from the proposed Project's area sources, which include operation of gasoline-powered landscape maintenance equipment, which produce minimal GHG emissions. It was assumed that 100% of the landscaping equipment would be gasoline powered. Consumer product use and architectural coatings result in VOC emissions, which are analyzed in air quality analysis only.

Energy Sources

The estimation of operational energy emissions was based on CalEEMod land use defaults and units or total area (i.e., square footage) of the proposed Project's land uses. For nonresidential buildings, CalEEMod energy intensity value (electricity or natural gas usage per square foot per year) assumptions were based on the California Commercial End-Use Survey database. Emissions are calculated by multiplying the energy use by the utility carbon intensity (pounds of GHGs per kilowatt-hour for electricity or 1,000 British thermal units for natural gas) for CO₂ and other GHGs. Annual natural gas (non-hearth) and electricity emissions were estimated in CalEEMod using the emissions factors for LADWP, which would be the energy source provider for the proposed Project. CalEEMod default energy intensity factors (CO₂, CH₄, and N₂O mass emissions per kilowatt-hour) for LADWP is based on LADWP's 2017 Power Strategic Long-Term Resource Plan.

Mobile Sources

All details for criteria air pollutants discussed in Section III are also applicable for the estimation of operational mobile source GHG emissions. Regulatory measures related to mobile sources include AB 1493 (Pavley) and related federal standards. AB 1493 required that CARB establish GHG emission standards for automobiles, light-duty trucks, and other vehicles determined by CARB to be vehicles that are primarily used for noncommercial personal transportation in the state. In addition, the National Highway Safety Administration (NHTSA) and EPA have established corporate fuel economy standards and GHG emission standards, respectively, for automobiles and light-, medium, and heavy-duty vehicles. Implementation of these standards

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and fleet turnover (replacement of older vehicles with newer ones) will gradually reduce emissions from the proposed Project's motor vehicles.

Solid Waste

The proposed Project would generate solid waste, and therefore, result in CO₂e emissions associated with landfill off-gassing. CalEEMod default values for solid waste generation were used to estimate GHG emissions associated with solid waste.

Water and Wastewater

Supply, conveyance, treatment, and distribution of water for the proposed Project require the use of electricity, which would result in indirect GHG emissions. Similarly, wastewater generated by the proposed Project requires the use of electricity for conveyance and treatment, along with GHG emissions generated during wastewater treatment. Water consumption estimates for both indoor and outdoor water use and associated electricity consumption from water use and wastewater generation were estimated using CalEEMod.

The estimated operational (year 2027) Project-generated net GHG emissions from area sources, energy usage, motor vehicles, solid waste generation, and water usage and wastewater generation are shown in Table 18.

Table 18
Estimated Annual Operational GHG Emissions

Emission Source	CO ₂	CH ₄	N ₂ O	CO ₂ e
	metric tons per year			
Proposed Project (New Classroom Building Only)				
Area	0.01	0.00	0.00	0.01
Energy	102.48	0.003	0.00	102.81
Mobile	299.37	0.013	0.00	299.70
Solid waste	5.00	0.30	0.00	12.39
Water supply and wastewater	10.59	0.02	0.00	11.28
Total	417.45	0.336	0.00	426.19
Existing Operation (Demolition of Portable Facilities)				
Area	0.00	0.00	0.00	0.00
Energy	74.52	0.002	0.00	74.78
Mobile	425.31	0.02	0.00	425.80
Solid waste	6.77	0.40	0.00	16.77
Water supply and wastewater	14.33	0.03	0.00	15.26
Total	520.93	0.452	0.00	532.61
Net Change in Emissions				
Area	0.01	0.00	0.00	0.01
Energy	27.96	0.001	0.00	28.03
Mobile	-125.94	-0.01	0.00	-126.10
Solid waste	-1.77	-0.10	0.00	-4.38
Water supply and wastewater	-3.74	-0.01	0.00	-3.98



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Table 18
Estimated Annual Operational GHG Emissions

Emission Source	CO ₂	CH ₄	N ₂ O	CO ₂ e
	metric tons per year			
Total	-103.48	-0.12	0.00	-106.42
Amortized Construction Emissions				163.30
Operation + Amortized Construction Total				56.88
Notes: CO ₂ = carbon dioxide; CH ₄ = methane; N ₂ O = nitrous oxide; CO ₂ e = carbon dioxide equivalent See Appendix B for detailed results. These emissions reflect operational year 2027.				

As shown in Table 18, estimated net annual operational Project GHG emissions from the demolition of the portable buildings and construction of the new permanent classroom would be decreased by approximately 106 MT CO₂e per year as a result of proposed Project implementation. Estimated annual Project-generated operational net emissions in 2027 (decrease of 106 MT CO₂e per year) plus amortized Project construction emissions (increase of 163 MT CO₂e per year) would be approximately 57 MT CO₂e per year, which would not exceed the recommended SCAQMD threshold of 3,000 MT CO₂e per year. Therefore, in relation to the generation of GHGs, the proposed Project's impact would be less than significant. No mitigation or further study is required.

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

Less than Significant Impact.

The City of Los Angeles Sustainable City Plan

The City of Los Angeles adopted a Sustainable City Plan in 2015, and updated the plan in 2019, with the L.A.'s Green New Deal, Sustainable City Plan (Plan). While the Green New Deal is not a qualified GHG reduction plan under CEQA Guidelines Section 15183.5, and thus cannot be used in a cumulative impacts analysis to determine significance under CEQA, this section provides an evaluation of the Project's potential to conflict with applicable Plan strategies for disclosure and informational purposes. The Green New Deal includes 13 chapters and is built on the following four principles:

- First, a commitment to the Paris Climate Agreement and to act urgently with a scientifically-driven strategy for achieving a zero carbon grid, zero carbon transportation, zero carbon buildings, zero waste, and zero wasted water.
- Second, a responsibility to deliver environmental justice and equity through an inclusive economy, producing results at the community level, guided by communities themselves.
- Third, a duty to ensure that every Angeleno has the ability to join the green economy, creating pipelines to good paying, green jobs and a just transition in a changing work environment.

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- Fourth, a resolve to demonstrate the art of the possible and lead the way, walking the walk and using the City’s resources - our people and our budget - to drive change.

Table 19 provides an overview of the 13 chapters and targets of the Green New Deal. The proposed Project includes seismic safety retrofits to many existing buildings and removal and replacement of portable buildings with a new permanent classroom (net decrease in building area), ADA improvements, and other maintenance and utility improvements. The proposed Project would not conflict with any of the Green New Deal targets and would not impede the City from progress towards meeting any targets within the Green New Deal. The proposed Project would not conflict with any GHG reduction measures set forth in the Green New Deal.

Table 19
L.A.’s Green New Deal Chapter Target Summary

Chapter	Target
Environmental Justice	Improve the raw scores of CalEnviroScreen indicators of L.A. communities in the top 10% by an average of 25% by 2025; and 50% by 2035
	Reduce the number of annual childhood asthma-related emergency room visits in L.A.’s most contaminated neighborhoods to less than 14 per 1,000 children by 2025; and 8 per 1,000 children by 2035
Renewable Energy	LADWP will supply 55% renewable energy by 2025; 80% by 2036; and 100% by 2045
	Increase cumulative MW by 2025; 2035; and 2050 of: Local solar to 900-1,500 MW; 1,500-1,800 MW; and 1,950 MW Energy storage capacity to 1,654-1,750 MW; 3,000 MW; and 4,000 MW Demand response (DR) programs to 234 MW (2025) and 600 MW (2035)
Local Water	Source 70% of L.A.’s water locally and capture 150,000 acre ft/yr of stormwater by 2035
	Recycle 100% of all wastewater for beneficial reuse by 2035
	Build at least 10 new multi-benefit stormwater capture projects by 2025; 100 by 2035; and 200 by 2050
	Reduce potable water use per capita by 22.5% by 2025; and 25% by 2035; and maintain or reduce 2035 per capita water use through 2050
Clean & Healthy Building	Install or refurbish hydration stations at 200 sites, prioritizing municipally-owned buildings and public properties such as parks, by 2035
	All new buildings will be net zero carbon by 2030; and 100% of buildings will be net zero carbon by 2050
Housing & Development	Reduce building energy use per sq.ft. for all building types 22% by 2025; 34% by 2035; and 44% by 2050
	End street homelessness by 2028
	Increase cumulative new housing unit construction to 150,000 by 2025; and 275,000 units by 2035
	Ensure 57% of new housing units are built within 1,500 ft of transit by 2025; and 75% by 2035
	Create or preserve 50,000 income-restricted affordable housing units by 2035 and increase stability for renters



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Table 19
L.A.'s Green New Deal Chapter Target Summary

Chapter	Target
Mobility and Public Transit	Increase the percentage of all trips made by walking, biking, micro-mobility / matched rides or transit to at least 35% by 2025; 50% by 2035; and maintain at least 50% by 2050
	Reduce VMT per capita by at least 13% by 2025; 39% by 2035; and 45% by 2050
	Ensure Los Angeles is prepared for Autonomous Vehicles (AV) by the 2028 Olympic and Paralympic Games
Zero Emission Vehicles	Increase the percentage of electric and zero emission vehicles in the city to 25% by 2025; 80% by 2035; and 100% by 2050
	Electrify 100% of LA Metro and LADOT buses by 2030
	Reduce port-related GHG emissions by 80% by 2050
Industrial Emissions & Air Quality Monitoring	The City will reach the U.S. EPA 80 ppb ozone attainment standard by 2025 and meet all future compliance dates
	Reduce industrial emissions by 38% by 2035; and 82% by 2050
	Reduce methane leak emissions by 54% by 2035; and 80% by 2050
Waste & Resource Recovery	Increase landfill diversion rate to 90% by 2025; 95% by 2035; and 100% by 2050.
	Reduce municipal solid waste generation per capita by at least 15% by 2030, including phasing out single-use plastics by 2028
	Eliminate organic waste going to landfill by 2028.
	Increase proportion of waste products and recyclables productively reused and/or repurposed within L.A. County to at least 25% by 2025; and 50% by 2035
Food Systems	Ensure all low-income Angelenos live within ½ mile of fresh food by 2035.
	Increase the number of urban agriculture sites in L.A. by at least 25% by 2025; and 50% by 2035
	Prepare for natural disasters by increasing the resiliency of our food systems infrastructure
Urban Ecosystems & Resilience	Increase tree canopy in areas of greatest need by at least 50% by 2028
	Complete or initiate restoration identified in the 'ARBOR' Plan by 2035
	Create a fully connected LARiverWay public access system that includes 32 miles of bike paths and trails by 2028
	Reduce urban/rural temperature differential by at least 1.7 degrees by 2025; and 3 degrees by 2035
	Ensure proportion of Angelenos living within 1/2 mile of a park or open space is at least 65% by 2025; 75% by 2035; and 100% by 2050
	Achieve and maintain 'no-net loss' of native biodiversity by 2035
Prosperity and Green Jobs	Create 300,000 green jobs by 2035, and 400,000 green jobs by 2050
	Increase private sector green investment in L.A. by \$750 million by 2025; and \$2 billion by 2035
	Eliminate unemployment rate gap between City of L.A. and L.A. County

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Table 19
L.A.'s Green New Deal Chapter Target Summary

Chapter	Target
Lead by Example	Reduce municipal greenhouse gas emissions 55% by 2025; 65% by 2035; and reach carbon neutral by 2045
	Reduce municipal energy use by 18% by 2025; 35% by 2035; and 44% by 2050
	Reduce municipal water use by at least 25% by 2025; and 30% by 2035
	Lead on zero waste and achieve a zero waste City Hall by 2025
	Convert all City fleet vehicles to zero emission where technically feasible by 2028
	Ensure all new municipally owned buildings and major renovations will be all-electric, effective immediately
	Reach 2 million Angelenos through outreach, education, and training programs by 2025
Source: City of Los Angeles 2019	

Southern California Association of Governments 2016 RTP/SCS

Southern California Association of Governments (SCAG) 2016 RTP/SCS is a regional growth-management strategy that targets per capita GHG reduction from passenger vehicles and light-duty trucks in the Southern California region pursuant to Senate Bill 375. In addition to demonstrating the region's ability to attain and exceed the GHG emission-reduction targets set forth by CARB, the 2016 RTP/SCS outlines a series of actions and strategies for integrating the transportation network with an overall land use pattern that responds to projected growth, housing needs, changing demographics, and transportation demands. Thus, successful implementation of the 2016 RTP/SCS would result in more complete communities with a variety of transportation and housing choices, while reducing automobile use. Strategies and policies set forth in the 2016 RTP/SCS can be grouped into the following three categories: (1) reduction of vehicle trips and VMT; (2) increased use of alternative fuel vehicles; and (3) improved energy efficiency. The proposed Project's consistency with these three strategy categories is presented below.

1) Consistency with VMT Reduction Strategies and Policies

The proposed Project's consistency with this aspect of the 2016 RTP/SCS is demonstrated via the Project's land use characteristics and consistency with the regional growth forecast assumed in the 2016 RTP/SCS for the City. As discussed in Section 2.5 of this IS/MND, the proposed Project site has a General Plan Land Use Designation of "Public Facilities" and is zoned as PF-1. The "PF" zone allows for construction/alteration/enlargement of structures onsite for secondary schools. The proposed uses for the Project site are consistent with the existing land use designations, and no changes in land use designations would be required. The proposed Project does not affect the SCAQMD demographic growth forecasts for various socioeconomic categories (e.g., population, housing, employment by industry) developed by the SCAG, because the Project would not increase the number of students or faculty at the school. Accordingly, the proposed Project is consistent with the SCAG RTP/SCS forecasts used in the SCAQMD AQMP development.



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2) Increased Use of Alternative Fueled Vehicles Policy Initiative

The second goal of the 2016 RTP/SCS, with regard to individual development Projects such as the proposed Project, is to increase alternative fueled vehicles to reduce per capita GHG emissions. This 2016 RTP/SCS policy initiative focuses on accelerating fleet conversion to electric or other near zero-emission technologies. The proposed remodeling activities would not increase classroom or building occupancy capacities or uses. Replacement of portable buildings with a new permanent classroom would not increase the number of students or faculty at the school. Therefore the Project is not anticipated to change daily traffic and peak hour trips that would be part of existing school activities.

3) Energy Efficiency Strategies and Policies

The third important focus within the 2016 RTP/SCS, for individual developments such as the proposed Project involves improving energy efficiency (e.g., reducing energy consumption) to reduce GHG emissions. The 2016 RTP/SCS goal is to actively encourage and create incentives for energy efficiency, where possible. The proposed Project would include replacement of portable buildings with a new permanent classroom (net decrease in building area) and comply with the applicable 2016 CALGreen standards for new construction.

Based on the analysis above, the proposed Project would be consistent with the SCAG 2016 RTP/SCS.

California Air Resources Board Scoping Plan and Reduction Goals

The Climate Change Scoping Plan, approved by CARB in 2008 and updated in 2014 and 2017, provides a framework for actions to reduce California's GHG emissions and requires CARB and other state agencies to adopt regulations and other initiatives to reduce GHGs. The Scoping Plan is not directly applicable to specific projects, and it is not intended to be used for project-level evaluations. Under the Scoping Plan, however, there are several state regulatory measures aimed at identifying and reducing GHG emissions. CARB and other state agencies have adopted many of the measures identified in the Scoping Plan. Most of these measures focus on area source emissions (e.g., energy usage, and high-GWP GHGs in consumer products) and changes to the vehicle fleet (e.g., hybrid, electric, and more fuel-efficient vehicles) and associated fuels, among others.

Regarding consistency with Senate Bill 32 (goal of reducing GHG emissions to 40% below 1990 levels by 2030) and Executive Order S-3-05 (goal of reducing GHG emissions to 80% below 1990 levels by 2050), there are no established protocols or thresholds of significance for that future-year analysis. However, CARB has expressed optimism with regard to both the 2030 and 2050 goals. It states in the First Update to the Climate Change Scoping Plan: Building on the Framework that "California is on track to meet the near-term 2020 GHG emissions limit and is well positioned to maintain and continue reductions beyond 2020 as required by AB 32."⁷⁵ With regard to the 2050 target for reducing GHG emissions to 80% below 1990 levels, CARB (2014) states the following:

This level of reduction is achievable in California. In fact, if California realizes the expected benefits of existing policy goals (such as 12,000 megawatts of renewable distributed generation by 2020, net zero energy homes

⁷⁵ CARB (California Air Resources Board). 2014. First Update to the Climate Change Scoping Plan Building on the Framework Pursuant to AB 32 – The California Global Warming Solutions Act of 2006. May 2014. http://www.arb.ca.gov/cc/scopingplan/2013_update/first_update_climate_change_scoping_plan.pdf.

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after 2020, existing building retrofits under Assembly Bill 758, and others) it could reduce emissions by 2030 to levels squarely in line with those needed in the developed world and to stay on track to reduce emissions to 80% below 1990 levels by 2050. Additional measures, including locally driven measures and those necessary to meet federal air quality standards in 2032, could lead to even greater emission reductions.

In other words, CARB believes that the state is on a trajectory to meet the 2030 and 2050 GHG reduction targets set forth in AB 32, Senate Bill 32, and Executive Order S-3-05. This is confirmed in the 2017 Climate Change Scoping Plan Update, which states: The Proposed Plan builds upon the successful framework established by the Initial Scoping Plan and First Update, while also identifying new, technologically feasibility and cost-effective strategies to ensure that California meets its GHG reduction targets in a way that promotes and rewards innovation, continues to foster economic growth, and delivers improvements to the environment and public health, including in disadvantaged communities. The Proposed Plan is developed to be consistent with requirements set forth in AB 32, SB [Senate Bill] 32, and AB 197.⁷⁶

The proposed Project would not interfere with implementation of GHG reduction goals for 2030 or 2050 because it would not exceed the SCAQMD's recommended threshold of 3,000 MT CO₂e per year. As shown in Table 18, the operation of the proposed Project is expected to reduce GHG emissions over the existing operation. The increase in GHG emissions as a result of the construction of the project are temporary.

As described in the Program EIR and above, the Project as a component of implementation of the SUP, would not conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases. The proposed Project would not conflict L.A.'s Green New Deal targets or the SCAG RTP/SCS, California AB 32, CARB Scoping Plan, and other Statewide strategies to reduce GHG emissions. Additionally, the proposed Project would adhere to LAUSD's School Design Guide construction requirements to reuse, recycle, and salvage non-hazardous materials generated during demolition and/or new construction. With respect to all SUP projects, implementation of SC-GHG-1 through SC-GHG-5 and SC-USS-1 would ensure that the proposed Project would not conflict with applicable plans, policies or regulations adopted for the purpose of reducing GHG emissions. Therefore, the proposed Project would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs; therefore, impact would be less than significant. No mitigation or further study is required.

⁷⁶ CARB (California Air Resources Board). 2017. California's 2017 Climate Change Scoping Plan. November 2017. Accessed May 2019. https://www.arb.ca.gov/cc/scopingplan/scoping_plan_2017.pdf



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

Explanation:

The analyses in this section were compiled from information taken from review of the Phase I Environmental Site Assessment (ESA) Report prepared by Geosyntec Consultants in 2017 (Appendix F); Preliminary Environmental Assessment Equivalent (PEA-E) Report prepared by Parsons in 2019 (Appendix F); Electromagnetic Field (EMF) Survey Report prepared by Geosyntec Consultants in 2019 (Appendix F); General Plan's Safety Element, the Department of Toxic Substances Control's EnviroStor data, the Los Angeles County Fire Department's (CALFire) Very High Fire Hazards Severity Zones Map; the California Energy Commission's GIS open data; and, the California State Water Resources Control Board (SWRCB) GeoTracker system. GeoTracker is the SWRCB's internet-accessible database system used to track and archive compliance data from authorized or unauthorized discharges of waste to land, or unauthorized releases of hazardous substances from underground storage tanks.⁷⁷

Projects implemented under the SUP were determined in the Program EIR to result in less than significant impacts to hazards and hazardous materials. LAUSD has five SCs for minimizing impacts in the category of

⁷⁷ California State Water Resources Control Board. 2019. GeoTracker Database. Accessed, May 15, 2019. <https://geotracker.waterboards.ca.gov/map/?CMD=runreport&myaddress=John+F.+Kennedy+High+School%2C+Gothic+Avenue>

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hazards and hazardous materials, as well as one SC for minimizing impacts to public services and one SC for minimizing impacts to traffic that are applicable to hazards and hazardous materials. Applicable SCs related to hazards and hazardous materials impacts associated with the proposed Project are provided below:

LAUSD Standard Conditions of Approval	
SC-HAZ-4	The Construction Contractor shall comply with the following OEHS Site Assessment practices and requirements (as applicable): <ul style="list-style-type: none"> • District Specification Section 01 4524, Environmental Import / Export Materials Testing. • Removal Action Workplan or Remedial Activities Workplan. • California Air Resources Board Rule 1466. • Guidelines and Procedures to Address Polychlorinated Biphenyls (PCBs) in Building Materials - particularly applicable to buildings that were constructed or remodeled between 1959 and 1979. • Lead and asbestos abatement requirements identified by the Facilities Environmental Technical Unit (FETU) in the Phase I / Phase II, or abatement plan(s).
SC-PS-2	LAUSD shall implement emergency preparedness and response procedures in all schools as required in LAUSD References, Bulletins, Safety Notes, and Emergency Preparedness Plans.
SC-T-4	LAUSD shall require its Construction Contractors to submit a Construction Worksite Traffic Control Plan to OEHS for review prior to construction. The plan will show the location of any haul routes, hours of operation, protective devices, warning signs, access to abutting properties and applicable transportation related safety measures as required by local and State agencies. LAUSD shall encourage its Construction Contractor to limit construction-related trucks to off-peak commute periods.

Phase I Environmental Site Assessment

The Phase I ESA was prepared for Kennedy HS within the areas planned for future construction. The purpose of the Phase I ESA is to identify recognized environmental conditions (RECs), historical RECs, or controlled RECs. As part of the records review, Geosyntec Consultants conducted records reviews of agency records; a review of the database search report from Environmental Data Resources, Inc., which is a governmental database search; and a review of historical aerial photographs. In addition, the Phase I ESA conducted a site reconnaissance to assess present site conditions, and to evaluate evidence for potential RECs on the Campus. Based on the records review and site reconnaissance, the Phase I ESA identified buildings on the Campus constructed in 1971 as a historical REC due to the potential historic use of lead based paint and asbestos (Appendix F).

Preliminary Environmental Assessment – Equivalent Report

The PEA-E documents the results of soil sampling and laboratory analyzes for the Project. The soil sampling included 41 boring locations near the proposed Project areas. The results indicate the concentrations of polychlorinated biphenyls (PCBs), total petroleum hydrocarbons (TPH), and volatile organic compounds (VOCs) were below their preliminary screening level (PSL), which is the level at which there is a potential risk associated. Concentrations of organochlorine pesticides (OCPs) was above their respective PSL at 0.5 feet to 3 feet below ground surface (bgs) at one boring location. One boring location sampled had lead concentrations above the PSL. As such, the shallow soil is impacted by lead and OCPs (in this case it was 4,4- DDE), and can be managed as non-hazardous waste (Appendix F).

Electromagnetic Field Survey

The EMF survey was prepared for Kennedy HS to measure the EMF strength at outdoor locations across portions of the Campus, due to its proximity to 230 kilovolt (kV) and 500 kV power lines, and to support the



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construction of a new classroom building on Campus. To minimize exposure to EMFs associated with high-voltage transmission lines for students and staff at school sites, the California Department of Education (CDE) is employing a “precautionary principle” by establishing setback zones. The California Code of Regulations (CCR), Title 5, Section 14010(c), specifies a distance setback requirement for power lines greater than 50 kV for proposed new school sites and school additions. As such, there were two surveys conducted on April 1 and 2, 2019 to collect EMF measurements at various locations on Campus. Given the presence of the 230 kV and the 500 kV power lines, the distance was evaluated between the Campus structures and power lines in the context of what CDE would require. Based on the results of the EMF survey, the location of the New Classroom Building would comply with requirements of the CCR Title 5 Section 14010(c), since the New Classroom Building would be approximately 750 feet and 860 feet from the 230 kV power line and 500 kV power line, respectively (Appendix F)

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. Several hazardous materials and chemicals would be associated with Project construction and demolition activities. Project construction would involve activities that would include the transport, storage, use, or disposal of hazardous materials. Given the age of some of the permanent and temporary structures on the Project site, several hazardous materials, such as PCBs, Asbestos Containing Materials (ACMs) and lead-based paints could be present on site. Hazards resulting from these materials are usually associated with the demolition of buildings constructed prior to 1976, before the Toxic Substances Control Act was signed and effectively addressed the production, importation, use, and disposal of specific chemicals including PCBs, asbestos, radon and lead-based paint. As shown in Table 1, several of the permanent Campus buildings were constructed in 1971 and could contain these hazardous materials. Due to the proposed interior renovations to some of these buildings, Project implementation has the potential to create a significant hazard to the public and to the environment through the routine transport, use or disposal of hazardous materials (Appendix F). However, the storage, handling, and disposal of these materials is regulated by the Department of Toxic Substances Control (DTSC), the United States Environmental Protection Agency (EPA), the Occupational Safety & Health Administration (OSHA), the SCAQMD, and the Los Angeles Fire Department (LAFD). Additionally, the construction contractor would comply with the hazardous materials identification and removal recommendations outlined in SC-HAZ-4, thereby, reducing the risk of creating a significant hazard to the public or the environment through the routine transport, use or disposal of hazardous materials during construction-related activities.

According to the PEA-E, one soil boring location was determined to be impacted by lead and OCBs. Approximately three (3) cubic yards of impacted soil were removed from the Campus as part of a housekeeping action and disposed of off-site in accordance with the conditions presented in the PEA-E. It is anticipated that redevelopment on or near the existing portable classrooms on the north side of Campus may require remediation by soil removal. Any additional clean-up activities would be completed prior to any new construction activities, and any new buildings would be occupied in accordance with federal, state, and local regulations. In addition, a Soil Management Plan (SMP) for the portable classrooms on the north side of Campus would be prepared, prior to excavation and redevelopment activities. The purpose of the SMP is to provide guidance to project management, site management, and field personnel on the identification and

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management of soil that is impacted and clean, to segregate and stockpile impacted soil, and remove and dispose of it at a disposal facility licensed to accept such soil in accordance with all applicable regulations, and construction debris during excavation, grading, and construction activities.

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

The proposed Project is an educational facility. Schools do not typically include operations involving the routine transport, storage, production, use or disposal of acutely hazardous materials. Small amounts of typical household hazardous materials such as pesticides, cleaning products, and paints would be stored on the Project site over the course of its operation. However, the types, uses, and quantities of these household hazardous materials would not differ when compared to existing conditions and the Project would adhere to local and state law pertaining to the maintenance of appropriate storage areas, use and safe disposal of these substances. Thus, the school's use of these potentially harmful materials would not be considered a significant impact.

Given the above, the proposed Project would have a less than significant impact to the public or the environment through the routine transport, use or disposal of hazardous materials during both construction and operation. No mitigation or further study is required.

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

Less than Significant Impact. According to the DTSC's EnviroStor database and the SWRCB's GeoTracker system, the Project site is not located on, or in the general vicinity of, any hazardous materials facilities or sites that could potentially release hazardous materials into the environment as a result of reasonably foreseeable upset and/or accident conditions. The nearest known hazardous materials release site, involving a 1998 closed-case soil contamination site, is located approximately 0.8 mile west of the Project site.⁷⁸ Additionally, the nearest known EnviroStor PCB and lead cleanup site is located 1.2 miles southwest of the Project site. Given these distances, the probability of hazardous materials' release from these sites affecting the Project site, as a result of reasonably foreseeable upset and/or accident conditions, would be low.

Construction and demolition activities on the Project site may include the transport, storage, use, or disposal of hazardous materials, which could result in a significant hazard to the public or the environment through reasonably foreseeable upset and/or accident conditions involving the release of hazardous materials into the environment. However, the storage, handling, and disposal of these materials is regulated by the DTSC, the EPA, OSHA, and LAFD. Additionally, as outlined in SC-HAZ-4, the construction Contractor would comply with the hazardous materials identification and removal recommendations outlined in SC-HAZ-4. Given these

⁷⁸ State Water Resources Control Board. 1998. GeoTracker Search – Mobil #11-J1L (T0603702294). Accessed, May 16, 2019. https://geotracker.waterboards.ca.gov/profile_report.asp?global_id=T0603702294



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precautions, the probability of the Project creating a significant hazard to the public or the environment through reasonably foreseeable upset and/or accident conditions involving the release of hazardous materials into the environment would be low.

Given the above, the proposed Project would result in less than significant impacts with regard to reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. No mitigation or further study is required.

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

Less than Significant Impact. As stated in Sections IX(a) and IX(b), the interior renovation of on-site buildings predating the Toxic Substances Control Act of 1976 could result in the release of hazardous or acutely hazardous materials, substances, or waste, such as PCBs, lead and ACMs at Kennedy High School. During the construction phase, it is possible children, staff, or visitors at the school could come into contact with these materials. However, the Project would adhere to the precautionary regulations required by DTSC, EPA, OSHA, and LAFD.SC-HAZ-04 would ensure that the following guidelines are followed: District Specification Section 01 4524, Environmental Import / Export Materials Testing; California Air Resources Board Rule 1466 Guidelines and Procedures to Address Polychlorinated Biphenyls (PCBs) in Building Materials, particularly applicable to buildings that were constructed or remodeled between 1959 and 1979; lead and asbestos abatement requirements identified by the FETU in the Phase I/Phase II; or abatement plan(s). Additionally, as outlined in SC-HAZ-4, the construction Contractor would comply with the applicable hazardous materials identification and removal recommendations to avoid any harm to construction workers, schoolchildren and the general public at the Project site. Given these precautions, the proposed Project would result in less than significant impacts concerning the emission and handling of acutely hazardous materials, substances or waste. No mitigation or further study is required.

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

No Impact. According to the DTSC's EnviroStor database and the SWRCB's GeoTracker system, the Project site is not located on, or in the general vicinity of, any hazardous materials facilities or sites as defined by Government Code Section 65962.5. The nearest known hazardous materials release site, involving a 1998 closed-case soil contamination site, is located approximately 0.8 mile west of the Project site.⁷⁹ Additionally, the nearest known EnviroStor PCB and lead cleanup site is located 1.2 miles southwest of the Project site.⁸⁰ Given that the proposed Project site is not located on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5, and given that the nearest release sites are between 0.8 mile and 1.2 miles

⁷⁹ State Water Resources Control Board. 1998. GeoTracker Search – Mobil #11-J1L (T0603702294). Accessed, May 16, 2019. https://geotracker.waterboards.ca.gov/profile_report.asp?global_id=T0603702294

⁸⁰ Department of Toxic Substances Control. 2011. EnviroStor Search – Valley Region High School No. 4 (600000068). Accessed, May 16, 2019. https://www.envirostor.dtsc.ca.gov/public/profile_report?global_id=600000068.

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away, the proposed Project would not create a significant hazard to the public or to the environment. No impact would occur and No mitigation or further study is required.

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

No Impact. The proposed Project is not located within an airport land use plan and is not within two miles of a public or public use airport. The closest public airport to the Project site is Van Nuys Airport, which is located approximately 3.8 miles south of the Project site in the City of Los Angeles. The airport is a general aviation facility owned and operated by Los Angeles World Airports.⁸¹ Given the above, the Project would not result in a safety hazard or excessive noise for people residing or working in the Project area. No impact would occur and No mitigation or further study is required.

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

Less than Significant Impact. The Project site is within the boundaries of the Granada Hills North Neighborhood Council area within the City of Los Angeles in the County of Los Angeles. The City's General Plan Safety Element functions as the City's emergency response planning document, and designates the Emergency Operations Organization (EOO) as the agency responsible for implementing emergency operations, including disaster response and recovery.⁸² Additionally, the County's Emergency Management Agency (EMA) is responsible for implementing the Operational Area Emergency Response Plan for the County (OAERP).⁸³ The OAERP addresses the coordinated response to emergency situations associated with natural, man-made and technological incidents.⁸⁴

The proposed Project would include 23,530 square feet of demolition, 149,630 square feet of remodeling, and the construction of a single 20,581 square-foot building. All Project construction and demolition would take place onsite and would not interfere with the EOO's or the EMA's ability to implement emergency operations in the event of a disaster. Additionally, the proposed Project would not include the construction of any roadways, structures or associated infrastructure, the construction of which would not impede the implementation of emergency procedures.

The County's Disaster Routes Map for the Valley Area labels SR-118 a primary disaster route and Balboa Boulevard as a secondary disaster route.⁸⁵ SR-118 runs in a west-east direction and is located approximately 850

⁸¹ Los Angeles County Airport Land Use Commission. 2004. Los Angeles County Airport Land Use Plan. December 1, 2004. Accessed April 12, 2019. http://planning.lacounty.gov/assets/upl/data/pd_alup.pdf.

⁸² City of Los Angeles. 1996. Safety Element of the Los Angeles City General Plan. Accessed, May 17, 2019. <https://planning.lacity.org/cwd/gnlpln/saftyelt.pdf>.

⁸³ County of Los Angeles Chief Executive Office. 2012. County of Los Angeles Operational Area Emergency Response Plan. Accessed, May 17, 2019. <https://ceo.lacounty.gov/emergencydisaster-plans-and-annexes/>.

⁸⁴ County of Los Angeles Chief Executive Office. 2012. County of Los Angeles Operational Area Emergency Response Plan, Introduction. Accessed, May 17, 2019. <https://ceo.lacounty.gov/wp-content/uploads/OEM/OAERP/SECTION%201.%20%20INTRODUCTION.pdf>.

⁸⁵ County of Los Angeles Department of Public Works. 2012. Disaster Routes Map for the City of Los Angeles- Valley Area. Accessed, May 17, 2019. <https://dpw.lacounty.gov/dsg/DisasterRoutes/map/Los%20Angeles%20Valley%20Area.pdf>.



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feet southwest of the Project site. Balboa Boulevard is a north-south running arterial that is located approximately 0.5 mile west of the Project site. Neither of the County designated emergency evacuation routes would be altered under the proposed Project. During Project implementation, the increased presence of construction equipment and constructed-related vehicles in the Project area may result in incremental traffic delays on these disaster routes. However, these delays would be temporary in nature and, with implementation of the Construction Worksite Control Plan required by SC-T-4, would not significantly impact the ability of residents to evacuate in the unlikely event of a major disaster event. Additionally, SC-PS-2 would ensure that emergency operations and procedures would be maintained with continued Project operation.

Given the above, the proposed Project would have a less than significant impact on the County and City's adopted emergency response plans and emergency evacuation plans. No mitigation or further study is required.

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

No Impact. The proposed Project would not expose people or structures to a risk of loss, injury, or death involving wildland fires. According to the General Plan's Safety Element, the Project site is not located within a designated wildfire hazard area and lies one mile southeast of the closest Very High Fire Hazard Severity Zone.⁸⁶ Furthermore, the Project site is located in a heavily urbanized area away from dense vegetation. The Project would adhere to the regulations outlined in the local fire code and Title 5 of the California Code of Regulations, which pertains to the construction of school facilities. Therefore, the proposed Project would not expose people or structures to a risk of loss, injury, or death involving wildland fires. Therefore, there would be no impact. No mitigation or further study is required.

⁸⁶ City of Los Angeles. 1996. Safety Element of the Los Angeles City General Plan. P.53. Accessed, May 17, 2019. <https://planning.lacity.org/cwd/gnlpln/safteyelt.pdf>.

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

Explanation:

The analyses in this section are supported by information obtained from the General Plan Safety Element, the City's 2015 Urban Water Management Plan (UWMP), the California Regional Water Quality Control board's (RWQCB) Water Quality Control Plan, and the Groundwater Quality Management Plan for the San Fernando Valley Basin.

LAUSD has six SCs for minimizing impacts to hydrology and water quality. Applicable SCs related to hydrology and water quality impacts associated with the proposed Project are provided below. Projects implemented under the SUP were determined in the Program EIR to result in less than significant hydrology and water quality. The proposed Project would have a less than significant impact on hydrology and water quality.

LAUSD Standard Conditions of Approval

SC-HWQ-1	LAUSD shall design and construct the project to meet or exceed the current and applicable stormwater guidelines. Stormwater Technical Manual This manual establishes design requirements and provides guidance for the cost-effective improvement of water quality in new and significantly redeveloped LAUSD school sites. These guidelines are intended to improve water quality and mitigate potential impacts to the Maximum Extent Practicable (MEP). These
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	guidelines meet current post-construction Standard Urban Stormwater Mitigation Plan (SUSMP) and the mandated post-construction element of the NPDES program requirements.
SC-HWQ-2	<p>LAUSD shall implement the applicable stormwater requirements during construction activities.</p> <p>Compliance Checklist for Storm Water Requirements at Construction Sites This checklist has requirements for compliance with the General Construction Activity Permit and is used by OEHS to evaluate permit compliance. Requirements listed include a SWPPP; BMPs for minimizing storm water pollution to be specified in a SWPPP; and monitoring storm water discharges to ensure that sedimentation of downstream waters remains within regulatory limits.</p>
SC-HWQ-3	<p>LAUSD shall implement the following programs and procedures, as applicable:</p> <ul style="list-style-type: none"> • Environmental Training Curriculum – a qualified environmental Monitor shall provide a worker’s environmental awareness program that is prepared by LAUSD for the project. • Hazardous Waste Management Program (Environmental Compliance/Hazardous Waste). • Medical Waste Management Program. • Environmental Compliance Inspections. • Safe School Inspection Program. • Integrated Pest Management Program. • Fats Oil and Grease Management Program. • Solid Waste Management Program. • Other related programs overseen by OEHS.

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

Construction Phase

Less than Significant Impact. The proposed Project includes the modernization of an existing high school campus; construction activities would include 23,530 square feet of demolition, 149,630 square feet of remodeling, and the construction of a single 20,581 square-foot building. The proposed Project would comply with SC-HWQ-2, which guarantees that state and federal regulations pertaining to Storm Water Pollution Prevention Plans (SWPPP) be adhered to through implementation of a “Storm Water Requirements at Construction Sites Check List.” With implementation of SC-HWQ-2, the proposed Project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality during construction-related activities. Construction impacts would be less than significant. No mitigation or further study is required.

Operation Phase

The existing Kennedy HS would return to normal school operational activities after construction of the proposed Project. Day-to-day operations at schools do not typically include any activities that have the potential to substantially degrade water quality.

The Project site is served by the Donald T. Tillman Water Reclamation Plant (TWRP). According to the Los Angeles Citywide General Plan Framework EIR, the TWRP was designed to provide secondary treatment for approximately 80 million gallons of wastewater per day (mgd).⁸⁷ During operation of the proposed Project, the

⁸⁷ City of Los Angeles. 1995. Los Angeles Citywide General Plan Framework Environmental Impact Report. Accessed, May 21, 2019. https://planning.lacity.org/HousingInitiatives/HousingElement/FrameworkEIR/GPF_DraftEIR/GPF_FEIR_DEIR_Tide.pdf.

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quantity of wastewater produced would be similar than under existing conditions and would be disposed of in accordance with the applicable local and state guidelines, including Part 40, Section 122.41(m) of the Code of Federal Regulations (CFR), which pertains to waste diversion.⁸⁸

Additionally, Project implementation would mostly include interior renovations to existing buildings and the construction of one new 20,581 square foot building on an existing portion of the Campus that is currently developed with impervious materials. As such, the proposed Project would not result in a significant increase in impervious surfaces on the Project site. Given this, stormwater runoff and infiltration under the proposed Project would not differ significantly relative to existing conditions, and operation of the Project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality during construction-related activities. Operational impacts would be less than significant. No mitigation or further study is required.

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

Less than Significant Impact. According to the City's 2015 UWMP, water for the City is supplied by the LADWP and sourced from the Metropolitan Water District (via Los Angeles Aqueduct, the State Water Project and the Colorado River Aqueduct) and from local groundwater supplies.⁸⁹ The Project site lies within the San Fernando Basin (SFB) groundwater system, which has historically provided as much as 92% of the City's groundwater supply, making the SFB the primary source of groundwater for the City of Los Angeles.⁵⁶ According to the Geotechnical Report prepared for the Project (Appendix E), groundwater was not encountered up to 50.5 feet bgs at the Project site; however, groundwater has been historically observed at 170 to 200 feet bgs at the Project site. As such, groundwater is unlikely to be encountered or affected during construction. The proposed Project would not include the construction of any wells and, thus, would not directly utilize groundwater; rather, water to the Project site would be provided by the existing water utility infrastructure. The proposed Project would not result in an increase in student enrollment or staffing levels, and, as such would not result in increased demand for water at Kennedy HS, including increased demand from groundwater supplies. Additionally, as stated above in Section X(a), the Project would predominantly entail the interior renovation of existing buildings and the construction of one new 20,581-square-foot building. New construction would occur on an existing portion of the Project site that is developed with impervious materials under existing conditions. Given that the Project would not result in a substantial increase in impervious surfaces on the Project site and existing on-site drainage patterns would prevail upon Project operation, the proposed Project would not substantially alter groundwater supplies or interfere substantially with groundwater recharge such that the Project may impede sustainable groundwater management of the basin. Impacts would be less than significant. No mitigation or further study is required.

⁸⁸ Cornell Law School. 2019. Legal Information Institute (Website). 40 CFR § 122.41 - Conditions applicable to all permits (applicable to State programs, see § 123.25). Accessed, May 20, 2019. <https://www.law.cornell.edu/cfr/text/40/122.41>.

⁸⁹ City of Los Angeles. 2015. Urban Water Management Plan. Accessed, May 20, 2019. <https://planning.lacity.org/eir/CrossroadsHwd/deir/files/references/M217.pdf>.



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

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

Less than Significant Impact. The proposed Project would predominantly include interior renovations to existing buildings, and, as such, would not result in significant alterations to the existing on-site drainage patterns. The proposed Project would include the construction of a new 20, 581-square-foot classroom building; however, this new building would be located on a portion of the Campus that is paved under existing conditions. As such, the construction of the new classroom would not result in a substantial increase in impervious surfaces. Although the proposed Project would occur in close proximity to Bull Creek, which is subterranean beneath the Project site, LAUSD would adhere to the applicable regulations established to minimize erosion and siltation on the Project site and in the surrounding vicinity. Implementation of SC-HWQ-1 would ensure that the Project would meet or exceed the current and applicable stormwater guidelines. Erosion and siltation would be controlled during construction with the implementation of a site-specific SWPPP. Additionally, regulations as part of SC-HWQ-2 would require the manager to implement BMPs in order to minimize erosion, sedimentation, and siltation. These guidelines meet the mandated post-construction element of the NPDES program requirements. Therefore, the proposed Project would have a less than significant impact in regard to erosion or siltation on-or off-site. No mitigation or further study is required.

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

Less than Significant Impact. The Project site is relatively flat under existing conditions and has an elevation that ranges from 960 to 970 feet above mean sea level (msl). Surficial water drains as sheet flow from north to south into the public storm drain system. As stated above in items X(a) and X(b), Project implementation would mostly include interior renovations to existing buildings and the construction of one new 20,581 square foot building. The proposed new construction would take place on a portion of the Project site that is developed with impervious materials under existing conditions. As such, the proposed Project would not result in a significant increase in impervious surfaces on the Project site, and would not substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite. Additionally, the LAUSD would comply with City and County ordinances pertaining to drainage improvements, which would ensure that the proposed Project would not adversely affect the local drainage system in a manner that would result in substantial flooding on or off site. In addition, LAUSD would incorporate the CHPS standards and LAUSD BMPs required by SC-HWQ-1, SC-HWQ-2 and SC-HWQ-3. Therefore, the proposed Project would not 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

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amount of surface runoff in a manner that would result in flooding on- or off-site. Impacts would be less than significant and no mitigation or further study is required.

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

Less than Significant Impact. The Project site is flat under existing conditions and has an elevation that ranges from 960 to 970 feet above mean sea level (msl). Surficial water drains as sheet flow from north to south into the public storm drain system. Increased surface runoff is usually associated with construction that results in a significant increase in impervious surfaces, inhibits infiltration and resultantly channels a larger volume of water to the storm drain system. As stated above in X(ii), Project implementation would mostly include interior renovations to existing buildings and the construction of one new 20,581 square foot building. The proposed new construction would take place on a portion of the Project site that is currently developed with impervious materials. As such, the proposed Project would not result in a significant increase in impervious surfaces on the Project site upon buildout, and would not substantially increase the rate or volume of surface runoff such that the existing capacity of the stormwater drainage system would be exceeded. During construction of the proposed Project, debris and sediment from construction-related activities have the potential to contribute polluted stormwater runoff; however, LAUSD would implement SC-HWQ-1 and SC-HWQ-2, which would improve water quality and mitigate potential impacts to stormwater runoff to the extent practicable. Given this, the proposed Project would have a less than significant impact to the capacity of existing or planned stormwater drainage systems and would not provide substantial additional sources of polluted runoff. No mitigation or further study is required.

iv) Impede or redirect flood flows?

Less than Significant Impact. The proposed Project would not impede or redirect flood flows. According to the Geotechnical Report, the proposed Project is not located in a Federal Emergency Management Agency (FEMA) mapped flood hazard area. Additionally, Bull Creek, which is a tributary of the Los Angeles River that runs in a concrete-lined channel beneath the Project site, would serve as a localized drainage channel in periods with higher-than-usual rainfall or runoff potentially resulting in flood flows. Therefore, the proposed Project would not impede or redirect flood flows. No mitigation or further study is required.

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

Less than Significant Impact. According to the Geotechnical Report, the Project site is not within a tsunami inundation area. The Project site is located approximately 18 miles northeast of the ocean at its closest point. Due to this distance, the Project site would not be significantly impacted in the unlikely event of a tsunami and would not be at risk of releasing pollutants due to Project inundation by tsunami. According to the General Plan's Safety Element, the Project site is located in a potential inundation area due to its proximity to the Van Norman Reservoir.⁵⁷ A seiche (surface wave) occurs when a contained body of water (e.g. dams, reservoirs etc.) overflows its containment wall. The Van Norman Reservoir, located approximately one mile north of the Project site, could potentially inundate the Project site in the event of an earthquake (or other event) that results in the failure/collapse of the reservoir's containment wall. However, according to the General Plan's Safety



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Element, likelihood of a seiche is reduced to the extent practicable by LADWP through the regulation of the water levels in City storage facilities as well as the height of the containment walls.⁹⁰ Given this, the proposed Project would not be at significant risk of inundation due to seiche from the Van Norman Reservoir, and thus, would have a less than significant impact pertaining to the risk of releasing pollutants due to Project inundation. No mitigation or further study is required.

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

Less than Significant Impact. As stated above, the proposed Project includes the comprehensive modernization of Kennedy HS, and would entail 23,530 square feet of demolition, 149,630 square feet of remodeling, and the construction of a single 20,581 square-foot building. During construction, the LAUSD would implement SC-HWQ-1 and SC-HWQ-2, which would ensure the Project's compliance with local and state regulations, such as the SWPPP and BMP requirements of the NPDES. As such, the Project would adhere to local and state regulations pertaining to water quality and would resultantly comply with the Water Quality Control Plan (Los Angeles Region).⁹¹ As stated above in X(b), the Project site lies within the SFB groundwater system, which has historically provided as much as 92% of the City's groundwater supply, making the SFB the primary source of groundwater for the City of Los Angeles.⁵⁶ According to the Geotechnical Report prepared for the Project, groundwater was not encountered up to 50.5 feet bgs at the Project site; however, it has been historically observed at 170 to 200 feet bgs. The proposed Project would not include the construction of any wells and, thus, would not directly utilize groundwater; rather, water to the Project site would be provided by the existing water utility infrastructure. Additionally, as stated above in Section X(a), the Project would mostly include interior renovations to existing buildings and the construction of one new 20,581-square foot building on an existing portion of the Project site that is currently developed with impervious materials. The Project would not result in a substantial increase in impervious surfaces on the Project site, existing on-site drainage patterns would prevail once construction is complete, and the proposed Project would not substantially alter groundwater supplies or interfere substantially with groundwater recharge such that the Project may impede sustainable groundwater management of the basin. Given the above, the proposed Project would have a less than significant impact on groundwater, and, in turn, would adhere to the Groundwater Quality Management Plan for the San Fernando Valley Basin.⁹² No mitigation or further study is required.

⁹⁰ City of Los Angeles. 1996. Safety Element of the City of Los Angeles General Plan. Pg. II-16. Accessed, May 20, 2019. <https://planning.lacity.org/cwd/gnpln/saftyelt.pdf>.

⁹¹ California Regional Water Quality Control board. 1994. Water Quality Control Plan (Los Angeles Region). Accessed, May 20, 2019. https://www.waterboards.ca.gov/water_issues/programs/tmdl/docs/303d_policydocs/233.pdf.

⁹² City of Los Angeles, Department of Water and Power. 1983. Groundwater Quality Management Plan for the San Fernando Valley Basin. Accessed, May 20, 2019. <https://semsub.epa.gov/work/09/88129435.pdf>.

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

Explanation:

The Program EIR does not include any SCs for minimizing Project impacts to land use and planning; however, projects under the SUP were determined to have a less than significant impact to land use and planning.

The Kennedy HS Campus is located at 11254 Gothic Avenue within the Granada-Knollwood Community Area Plan in the City of Los Angeles (see Figure 1). The proposed Project site is generally bound by Simonds Street to the north, Woodley Avenue to the east, Gothic Avenue and a portion of Index Street to the west, and Donmetz Street to the south. Regional access to the site is from the Woodley Avenue, Exit 41 from the SR-118 and from the San Fernando Mission Boulevard, Exit 71B from I-405. Public access to the Main Office is from Gothic Avenue from either San Fernando Mission Boulevard to the south or from Rinaldi Street to the north.

The City of Los Angeles General Plan land use designation for the 27.4-acre Campus is “Public Facilities” (see Figure 6a).⁹³ The City of Los Angeles Municipal Code – Zoning Designation for the Kennedy HS Campus is “Public Facilities – PF” (see Figure 6b).⁹⁴ Permitted uses in both the general plan land use designation and the zoning code include public elementary schools.

a) Physically divide an established community?

No Impact. The proposed Project would not physically divide an established community. The Project includes the comprehensive modernization of the existing Kennedy HS Campus in order to provide facilities that are functional and safe. Although construction and demolition would occur under the proposed Project, all improvements would take place on the existing Campus. The Project would not include the construction of any new off-site infrastructure, such as buildings, roads etc. that would physically divide the surrounding established community. The proposed Project would not permanently affect or impede the movement of pedestrians or vehicles. As such, no impact would occur. No mitigation or further study is required.

⁹³ City of Los Angeles. 2014. General Plan Land Use Map. Accessed, May 16, 2019. [https://planning.lacity.org/MapGallery/Image/CPA/Landuse_PDF/Landuse\(P\)_GHL.pdf](https://planning.lacity.org/MapGallery/Image/CPA/Landuse_PDF/Landuse(P)_GHL.pdf).

⁹⁴ City of Los Angeles. 2014. Generalized Zoning Map. Accessed, May 16, 2019. [https://planning.lacity.org/MapGallery/Image/CPA/Zoning_PDF/Zoning\(P\)_GHL.pdf](https://planning.lacity.org/MapGallery/Image/CPA/Zoning_PDF/Zoning(P)_GHL.pdf).



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

No Impact. As stated above, the proposed Project would include the comprehensive modernization of the existing Kennedy HS Campus in order to provide facilities that are functional and safe. All improvements would take place on the existing Campus. The Project would not include the construction of any new off-site infrastructure, such as buildings, roads etc. that would conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. Additionally, the California legislature granted school districts the power to exempt school property from local zoning requirements, provided the school district complies with the terms of Government Code Section 53094. As lead agency for the proposed Project, the LAUSD BOE adopted a resolution on February 19, 2019 to exempt all school sites from local land use regulations.⁹⁵ The proposed Project would not cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. As such, no impact would occur. No mitigation or further study is required.

⁹⁵ LAUSD. 2019. Board of Education Report. Report. 18/19 ed. Vol. 256. Los Angeles, CA: LAUSD.

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

Explanation:

The Program EIR does not include any SCs for minimizing impacts to mineral resources; however, projects under the SUP were determined to have a less than significant impact to mineral resources.

The analyses in this section are based on information obtained from a desktop review of the General Plan and the DOC, California Geological Survey (CGS) Warehouse: Mineral Lands Classification.⁹⁶

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

No Impact. The primary natural mineral deposits occurring within the City of Los Angeles are sand and gravel resources.⁹⁷ The Project site is fully developed and has been utilized as a high school since 1971. The Project site is zoned for “Public Facilities,” which includes school uses, and is developed with hardscaping, landscaping, and structures that would preclude mining activities. Additionally, the Project site is classified as a Mineral Resource Zone-1 (MRZ-1), which is considered an area where geologic information indicates that no significant mineral deposits are present.⁹⁸ Given the above, implementation of the proposed Project would not result in the loss of availability of a known mineral resource that would be a value to the region and the residents of the state.

According to the Department of Conservation’s Department of Oil, Gas, and Geothermal Resources, the Project site is not located within an oil or gas field, and the nearest historic oil well is located 0.5 mile north of the Project site, where it was plugged and abandoned in 1957.⁹⁹ Given this, the proposed Project would not result in the loss of availability of known oil and gas reserves that would be a value to the region and to the residents of the state. No impact would occur. No mitigation or further study is required.

⁹⁶ California Department of Conservation. 2015. California Geological Survey (CGS) Warehouse: Mineral Lands Classification. Accessed, May 16, 2019. <https://maps.conservation.ca.gov/cgs/informationwarehouse/index.html?map=mlc>.

⁹⁷ City of Los Angeles. 2001. City of Los Angeles General Plan, Conservation Element. Accessed, May 16, 2019. <https://planning.lacity.org/cwd/gnlpln/consvelt.pdf>.

⁹⁸ California Department of Conservation, Division of Mines and Geology (Website). 2019. California Surface Mining and Reclamation Policies and Procedures. Accessed, May 16, 2019. <https://www.conservation.ca.gov/smgb/Guidelines/Documents/ClassDesig.pdf>.

⁹⁹ California Department of Conservation, Department of Oil, Gas, and Geothermal Resources. 1957. Report of Well Abandonment. Accessed, May 16, 2019. <ftp://ftp.consrv.ca.gov/pub/oil/WellRecord/037/03705385>.



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

No Impact. The primary natural mineral deposits occurring within the City of Los Angeles are sand and gravel resources. The Project site is fully developed and has been utilized as a High School since 1971. The Project site is zoned for “Public Facilities,” which includes school uses, and is developed with hardscaping, landscaping, and structures that preclude mining activities. Additionally, the Project site is classified as MRZ-1, which is considered an area where geologic information indicates that no significant mineral deposits are present.¹⁰⁰ The City of Los Angeles’ General Plan, Mineral Resources Map, indicates that there are no surface mining districts, state designated oil fields, or oil drilling districts within the vicinity of the Project site.¹⁰¹ Given the above, implementation of the proposed Project would not 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 mitigation or further study is required.

¹⁰⁰ California Department of Conservation. 2015. California Geological Survey (CGS) Warehouse: Mineral Lands Classification. Accessed, May 16, 2019. <https://maps.conservation.ca.gov/cgs/informationwarehouse/index.html?map=mlc>.

¹⁰¹ City of Los Angeles. 2001. City of Los Angeles General Plan, Conservation Element. Accessed, May 16, 2019. <https://planning.lacity.org/cwd/gnpln/consvelt.pdf>.

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

Explanation:

LAUSD has SCs for minimizing impacts to noise. Applicable SCs related to noise impacts associated with the proposed Project are provided below. Projects implemented under the SUP were determined in the Program EIR to result in potentially significant impacts to noise; however, the proposed Project would result in less than significant noise levels.

LAUSD Standard Conditions of Approval

SC-N-1	LAUSD shall design new buildings and other noise-generating sources to include features such as sound walls, building configuration, and other design features that attenuate exterior noise levels on a school campus to less than 67 dBA Leq. ¹⁰²
SC-N-2	<p>LAUSD shall analyze the acoustical environment of the site (such as traffic) and the characteristics of planned building components (such as Heating, Ventilation, and Air Conditioning [HVAC]), and designs shall achieve interior classroom noise levels of less than 45 dBA Leq with a target of 40 dBA Leq (unoccupied), and a reverberation time of 0.6 seconds. Noise reduction methods shall include, but are not limited to, sound walls, building and/or classroom insulation, HVAC modifications, double-paned windows, and other design features.</p> <ul style="list-style-type: none"> • New construction should achieve classroom acoustical quality consistent with the current School Design Guide and CHPS (California High Performance Schools) standard of 45 dBA Leq. • New HVAC installations should be designed to achieve the lowest possible noise level consistent with the current School Design Guide. HVAC systems shall be designed so that noise from the system does not cause the ambient noise in a classroom to exceed the current School Design Guide and CHPS standard of 45 dBA Leq • Modernization of existing facilities and/or HVAC replacement projects should improve the sound performance of the HVAC system over the existing system. • The District's purchase of new units should give preference to HVAC manufacturers that sell the lowest noise level units at the lowest cost. <p>Existing HVAC units operating in excess of 45 dBA Leq inside classrooms should be modified.</p>

¹⁰² L10 value represents the noise level that is exceeded 10% of the time or 6 minutes in an hour.



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SC-N-3	<p>LAUSD shall incorporate long-term permanent noise attenuation measures between new playgrounds, stadiums, and other noise-generating facilities and adjacent noise-sensitive land uses, to reduce noise levels to meet jurisdictional standards or an increase of 3 dB or less over ambient.</p> <p>Operational noise attenuation measures include, but are not limited to:</p> <ul style="list-style-type: none"> • Buffer zones; • Berms; • Sound barriers; • Buildings; • Masonry walls; • Enclosed bleacher foot wells; and/or <p>Other site-specific project design features.</p>
SC-N-4	<p>LAUSD or its Construction Contractor shall consult and coordinate with the school principal or site administrator, and other nearby noise sensitive land uses prior to construction to schedule high noise or vibration producing activities to minimize disruption. Coordination between the school, nearby land uses and the Construction Contractor shall continue on an as-needed basis throughout the construction phase of the project to reduce school and other noise sensitive land use disruptions.</p>
SC-N-5	<p>LAUSD shall require the Construction Contractor to minimize blasting for all demolition and construction activities, where feasible.</p>
SC-N-6	<p>For projects where pile driving activities are required within 150 feet of a structure, a detailed vibration assessment shall be provided by an acoustical engineer to analyze potential impacts related to vibration to nearby structures and to determine feasible mitigation measures to eliminate potential risk of architectural damage.</p>
SC-N-7	<p>LAUSD shall meet with the Construction Contractor to discuss alternative methods of demolition and construction for activities within 25 feet of a historic building to reduce vibration impacts. During the preconstruction meeting, the Construction Contractor shall identify demolition methods not involving vibration-intensive construction equipment or activities. For example: sawing into sections that can be loaded onto trucks results in lower vibration levels than demolition by hydraulic hammers.</p> <ul style="list-style-type: none"> • Prior to construction activities, the Construction Contractor shall inspect and report on the current foundation and structural condition of the historic building. • The Construction Contractor shall implement alternative methods identified in the preconstruction meeting during demolition, excavation, and construction, such as mechanical methods using hydraulic crushers or deconstruction techniques. • The Construction Contractor shall avoid use of vibratory rollers and packers adjacent to the building. • During demolition, the Construction Contractor shall not phase any ground-impacting operations near the building to occur at the same time as any ground impacting operation associated with demolition and construction. <p>During demolition and construction, if any vibration levels cause cosmetic or structural damage to the building or structure, a “stop-work” order shall be issued to the Construction Contractor immediately to prevent further damage. Work shall not restart until the building is stabilized and/or preventive measures to relieve further damage to the building are implemented.</p>
SC-N-8	<p>Projects within 500 feet of a non-LAUSD sensitive receptor, such as a residence, shall be reviewed by OEHS to determine what, if any, feasible project specific noise reduction measures are needed.</p> <p>The Construction Contractor shall implement project specific noise reduction measures identified by OEHS. Noise reduction measures may include, but are not limited to, the following:</p> <p>Source Controls</p> <ul style="list-style-type: none"> • Time Constraints – prohibiting work during sensitive nighttime hours. • Scheduling – performing noisy work during less sensitive time periods (on operating campus: delay the loudest noise generation until class instruction at the nearest classrooms has ended; residential: only between 7:00 AM and 7:00 PM). • Equipment Restrictions – restricting the type of equipment used. • Substitute Methods – using quieter methods and/or equipment.

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	<ul style="list-style-type: none"> • Exhaust Mufflers – ensuring equipment has quality mufflers installed. • Lubrication & Maintenance – well maintained equipment is quieter. • Reduced Power Operation – use only necessary size and power. • Limit Equipment On-Site – only have necessary equipment on-site. • Noise Compliance Monitoring – technician on site to ensure compliance. • Quieter Backup Alarms – manually-adjustable or ambient sensitive types. <p>Path Controls</p> <ul style="list-style-type: none"> • Noise Barriers – semi-permanent or portable wooden or concrete barriers. • Noise Curtains – flexible intervening curtain systems hung from supports. • Enclosures – encasing localized and stationary noise sources. • Increased Distance – perform noisy activities farther away from receptors, including operation of portable equipment, storage and maintenance of equipment. <p>Receptor Controls</p> <ul style="list-style-type: none"> • Window Treatments – reinforcing the building’s noise reduction ability. • Community Participation – open dialog to involve affected residents. • Noise Complaint Process – ability to log and respond to noise complaints. Advance notice of the start of construction shall be delivered to all noise sensitive receptors adjacent to the project area. The notice shall state specifically where and when construction activities will occur, and provide contact information for filing noise complaints with the Construction Contractor and the District. In the event of noise complaints noise shall be monitored from the construction activity to ensure that construction noise is not obtrusive.
SC-N-9	<p>Construction Contractor shall ensure that LAUSD interior classroom noise and exterior noise standards are met to the maximum extent feasible, or that construction noise is not disruptive to the school environment, through implementation of noise control measures, as necessary.¹⁰³ Noise control measures may include, but are not limited to:</p> <p>Path Controls</p> <ul style="list-style-type: none"> • Noise Attenuation Barriers¹⁰⁴ – Temporary noise attenuation barriers installed blocking the line of sight between the noise source and the receiver. Intervening barriers already present, such as berms or buildings, may provide sufficient noise attenuation, eliminating the need for installing noise attenuation barriers. <p>Source Controls</p> <ul style="list-style-type: none"> • Scheduling – performing noisy work during less sensitive time periods (on operating campus: delay the loudest noise generation until class instruction at the nearest classrooms has ended; residential areas: only between 7:00 AM and 7:00 PM). • Substitute Methods – using quieter methods and/or equipment. • Exhaust Mufflers – ensuring equipment has quality mufflers installed. • Lubrication & Maintenance – well maintained equipment is quieter. • Reduced Power Operation – use only necessary size and power. • Limit Equipment On-Site – only have necessary equipment on-site. • Quieter Backup Alarms – manually-adjustable or ambient sensitive types.

¹⁰³ The need for noise control measures depends on the type and quantity of equipment being used, the work being performed, and the proximity of the construction activity to active exterior use areas (e.g., playgrounds, athletic fields, etc.) or classrooms. For example, the need for noise control measures may be required if a major construction Project (e.g. demolition of a building and/or construction of a new building) takes place on an active LAUSD campus.

¹⁰⁴ While the height and Sound Transmission Class (STC) rating of the Noise Attenuation Barrier needed will depend on the Project specific conditions, an example of the specifications for a Noise Attenuation Barrier would be: Noise Attenuation Barriers shall be a minimum height of 12 feet and have a minimum Sound Transmission Class rating of 25 (STC-25).



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If OEHS determines that the above noise reduction measures will not reduce construction noise to below the levels permitted by LAUSD's noise standards LAUSD shall mandate that construction bid contracts include the following receptor controls:

Receptor Controls

- Temporary Window Treatments – temporarily reinforcing the building's noise reduction ability.

Temporary Relocation – in extreme otherwise unmitigable cases, students shall be moved to temporary classrooms/facilities away from the construction activity.

Background Information for the Noise Analysis

Existing Noise Conditions

The Project site consists of the existing Kennedy High School, located at 11254 Gothic Avenue in the community of Granada Hills in the City of Los Angeles. The Project site is bounded by Simonds Street to the north, Woodley Avenue to the east, Gothic Avenue and a portion of Index Street to the west, and Donmetz Street to the south. The Project site is generally surrounded by single-family residential homes and is approximately 720 feet (0.14 mile) northeast of the SR-118, at its closest point.

Existing ambient noise measurements were conducted adjacent to the Project site to characterize the existing noise environment. The daytime, short-term (1 hour or less) attended sound level measurements were taken with a Piccolo Soft dB sound-level meter. This sound-level meter meets the current American National Standards Institute (ANSI) standard for a Type 2 (General Purpose) sound-level meter. The calibration of the sound level meter was verified before and after the measurements were taken, and the measurements were conducted with the microphone positioned approximately five feet above the ground.

Four noise measurements were taken near noise-sensitive receptors adjacent to or near the Project site. The measurement locations are shown in Figure 10, Noise Measurement Locations, and the measured average noise levels and measurement locations are provided in Table 20. The primary noise sources at the measurement locations consisted of traffic along the adjacent roads. As shown in Table 20, measured average noise levels ranged from approximately 58 to 66 dBA L_{eq} .

Table 20
Measured Noise Levels

Receptors	Location (Land Use)/Address	Date	Time	L_{eq} (dBA)	L_{max} (dBA)
ST1	11244 Woodley Avenue (Residential)	January 30, 2019	10:12 a.m. – 10:27 a.m.	65.6	84.8
ST2	11315 Gothic Avenue (Residential)	January 30, 2019	10:45 a.m. – 11:01 p.m.	57.9	70.5
ST3	11315 Gothic Avenue (Residential).	January 30, 2019	11:08 p.m. – 11:23 p.m.	64.2	79.6
ST4	11149 Valjean Avenue (Residential).	January 30, 2019	11:28 a.m. – 11:43 a.m.	59.5	68.7

Notes: L_{eq} = Equivalent Continuous Sound Level (Time-Average Sound Level); L_{max} = Maximum Noise Level
Source: Dudek 2019

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City of Los Angeles Noise Ordinance

The City of Los Angeles regulates noise through several sections of its Municipal Code, namely:

- Section 41.40 (Noise Due to Construction, Excavation Work – When Prohibited), which establishes time prohibitions on noise generated by construction activity.
- Section 112.04 (Powered Equipment Intended for Repetitive Use in Residential Areas and Other Machinery, Equipment and Devices), which prohibits the use of loud machinery and/or equipment within 500 feet of residences and prohibits noise from machinery, equipment, or other devices that would result in an increase of more than 5 decibels (dB) above the ambient noise level at residences.
- Section 112.05 (Maximum Noise Level of Powered Equipment or Powered Hand Tools), which establishes maximum noise levels for powered equipment and powered hand tools (i.e., 75 dBA at a distance of 50 feet for construction, industrial, and agricultural equipment between the hours of 7:00 a.m. and 10:00 p.m.).
- According to Section 41.40, no construction activity that might create loud noises in or near residential areas or buildings shall be conducted between the hours of 9:00 p.m. and 7:00 a.m. on weekdays, before 8:00 a.m. or after 6:00 p.m. on Saturday and national holidays, or at any time on Sunday.

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

Construction

Less than Significant Impact. The City has established policies and regulations concerning the generation and control of noise that could adversely affect its citizens and noise-sensitive land uses. A significant impact may occur where a project would not comply with the City General Plan Land Use Compatibility Standards for Noise or the City of Los Angeles' Municipal Code (Ordinance No. 41.40 and 112.05), or would result in a substantial increase in noise levels compared to existing ambient conditions. Short-term noise impacts would be associated with on-site grading and construction activities. Construction activities would result in temporary increases in ambient noise levels in the Project area on an intermittent basis. Noise levels would fluctuate depending on the equipment type and duration of use, distances between noise source and receptors, and presence or absence of noise attenuation barriers. Construction-related short-term noise levels would be higher than existing ambient noise levels in the Project area but would be temporary in nature and stop upon completion of construction.

The Project site is located near multiple residential land uses. The nearest residential receptors are located within approximately 60 feet of the Project site boundary and within 75 feet of the nearest construction activities. Typically, construction activity would take place both near (60-75 feet) and far (approximately 1,350 feet or more) from any one noise-sensitive receiver over the span of Project construction. Most construction activities associated with the proposed Project would occur at distances of approximately 300 feet or more from existing noise-sensitive uses, which represents activities both near and far from any one receiver, as is typical for construction projects.



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The Project would be subject to the LAMC Section 112.05 (Maximum Noise Level of Powered Equipment or Powered Hand Tools) and LAMC Section 41.40 (Noise Due to Construction, Excavation Work – When Prohibited) regarding construction hours (allowed between 7:00 a.m. and 10:00 p.m. Monday through Saturday), as well as construction equipment noise thresholds. LAMC Section 112.05 states that no machinery such as lawn mowers, or other machinery, equipment, or mechanical or electrical device/hand tool that creates loud noises within a residential zone or within 500 feet of a residence can be used between the hours of 10:00 p.m. and 7:00 a.m. Further, LAMC Section 112.05 outlines noise restrictions for sites located within 500 feet of a residential zone, within the hours of 7:00 a.m. and 10:00 p.m. Additionally, the Project would be subject to LAUSD standard conditions SC-N-4 through SC-N-9, which pertain to noise from construction activities.

Equipment that would be in use during construction would include, in part, graders, backhoes, concrete saws, rubber tired dozers, loaders, cranes, forklifts, cement mixers, pavers, rollers, and air compressors. Special construction techniques and equipment such as pile driving or blasting are not anticipated for this Project. The typical maximum noise levels for various pieces of construction equipment at a distance of 50 feet are presented in Table 21 (note that the equipment noise levels presented in Table 21 are maximum noise levels). Typically, construction equipment operates in alternating cycles of full power and low power, producing average noise levels less than the maximum noise level. The average sound level of construction activity also depends on the amount of time that the equipment operates and the intensity of construction activities during that time.

Table 21
Construction Equipment Noise Levels

Equipment Type	Maximum Noise Level dB(A) at 50 feet
Air Compressor	81
Backhoe	80
Compactor	82
Concrete Mixer	85
Crane	83
Generator	81
Grader	85
Loader	85
Paver	89
Roller	74
Truck	88
Saw	76
Source: DOT 2018.	

The maximum noise levels at 50 feet for typical construction equipment would range up to 89 dBA for the type of equipment normally used for this type of construction project, although the hourly noise levels would vary. Construction noise in a well-defined area typically attenuates at approximately six dBA per doubling of distance.

The Federal Highway Administration's (FHWA) Roadway Construction Noise Model (RCNM) was used to estimate construction noise levels at the nearest noise-sensitive receivers (the nearest residences, located within

4. Environmental Checklist and Analysis

approximately 75 feet of the nearest construction and approximately 300 feet of the Project site’s acoustic center).¹⁰⁵ Although the model was funded and promulgated by FHWA, the RCNM is often used for non-roadway projects, because the same types of construction equipment used for roadway projects are also used for other project types. Input variables for the RCNM consist of the receiver/land use types, the equipment type and number of each (e.g., two graders, a loader, a tractor), the duty cycle for each piece of equipment (e.g., percentage of hours the equipment typically works per day), and the distance from the noise-sensitive receiver. No topographical or structural shielding was assumed in the modeling. The RCNM has default duty-cycle values for the various pieces of equipment, which were derived from an extensive study of typical construction activity patterns. Those default duty-cycle values were used for this noise analysis.

Using FHWA’s RCNM construction noise model and construction information (types and number of construction equipment by phase), the estimated noise levels from construction were calculated for the distances to the nearest noise-sensitive receivers (the nearest residences), as presented in Table 22, Construction Noise Model Results Summary. The RCNM inputs and outputs are provided in Appendix G.

Table 22
Construction Noise Model Results Summary

Construction Phase	Construction Noise at Representative Receiver Distances (L_{eq} (dBA))	
	Nearest Source-Receiver Distance (Approximately 75' Away)	Typical Source-Receiver Distance (Approximately 300' Away)
Demolition, Interim Housing, Modernization	83	74
Site Preparation, Modernization	80	71
Building Construction, Modernization	89	80
Asphalt Paving	77	67

Source: Appendix G
 L_{eq} = equivalent continuous sound level

As presented in Table 22, the highest noise levels are predicted to occur during the building construction phase, when noise levels from construction activities would be as high as approximately 89 dBA L_{eq} (equivalent continuous sound level) during the brief periods of time in which construction would be in immediate proximity of the nearest residences, and 80 dBA L_{eq} during the more typical periods of time in which construction would take place both near and far from any one receiver. During other phases of construction, construction noise would range from approximately 67 to 83 dBA L_{eq} .

¹⁰⁵ FHWA (Federal Highway Administration). 2008. Roadway Construction Noise Model. Accessed, July 1, 2019. https://www.fhwa.dot.gov/environment/noise/construction_noise/rcnm/.



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Construction activity on the Project site would adhere to City of Los Angeles limits on hours of construction, thus taking place between 7 a.m. and 9 p.m. Monday through Friday, between 8 a.m. and 6 p.m. on Saturday and national holidays, and would not take place outside on Sundays.

Nearby noise-sensitive land uses would be exposed to construction noise levels higher than ambient noise levels; ambient daytime noise levels at these locations ranged from 58 to 66 dBA L_{eq} . Although the noise from construction would be short-term and intermittent throughout the construction timeframe, and would cease upon Project construction, the short-term noise increase is considered potentially significant. However, construction impacts associated with short-term noise levels would be less than significant with implementation of LAUSD Standard Conditions, specifically SC-N-4 and SC-N-8, which require coordination with school administrators and nearby land uses to avoid disruptions from construction noise and which detail a variety of noise source controls, path controls, and receptor controls. No mitigation or further study is required.

Operation

Noise generated during operation of the Project would be consistent with the noise generated by the school under existing conditions. No new sources of on-site noise or noise-generating activities would be associated with operation of the proposed Project. Furthermore, after renovation and construction is completed, classrooms would be in the same general locations on Campus than under existing conditions, and outdoor recreation areas would not be located nearer to adjacent noise-sensitive land uses (compared to existing conditions). Additionally, the number of students, teachers, administrators, and other staff would not increase as a result of the proposed Project. Finally, the Project would be subject to LAUSD SC-N-1 through SC-N-3, which pertain to noise from operational activities and would ensure that noise from operational activities complies with District and City of Los Angeles noise standards. Therefore, on-site operational noise is not anticipated to increase relative to existing conditions. Project construction and operation would not generate a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or in other applicable local, state, or federal standards. No mitigation or further study is required.

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

Less than Significant Impact. Construction activities have the potential to expose persons to excessive ground-borne vibration or ground-borne noise. Caltrans has collected ground-borne vibration information related to construction activities indicating that continuous vibrations with a PPV of approximately 0.1 inches/second begin to annoy people.¹⁰⁶ The heavier pieces of construction equipment, such as an excavator, would have PPVs of approximately 0.089 inches/second or less at a distance of 25 feet.¹⁰⁷ Ground-borne vibration is typically attenuated over short distances. At the distance from the nearest residences to the proposed Project site (approximately 75 feet), and with the anticipated construction equipment, the PPV vibration level would be approximately 0.017 inches/second. This vibration level would be well below the vibration threshold of potential annoyance of 0.1 inches/second.

¹⁰⁶ Caltrans. 2013b. Transportation and Construction Vibration Guidance Manual. Division of Environmental Analysis, Environmental Engineering, Hazardous Waste, Air, Noise, Paleontology Office. September, 2013

¹⁰⁷ DOT (U.S. Department of Transportation). 2018. Transit Noise and Vibration Impact Assessment Manual. DOT, Federal Transit Administration. September 2018.

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The major concern with regard to construction vibration is related to building damage. Construction vibration as a result of the proposed Project would not result in structural building damage, which typically occurs at vibration levels of 0.5 inches/second or greater for buildings of reinforced-concrete, steel, or timber construction. The heavier pieces of construction equipment used would include typical construction equipment for this type of project, such as backhoes, front-end loaders, and flatbed trucks. Pile driving, blasting, and other special construction techniques would not be used for construction of the proposed Project; therefore, excessive ground-borne vibration and ground-borne noise would not be generated. Vibration levels from Project construction would be less than the thresholds of annoyance and potential for structural damage. Operation of the proposed Project would not result in any substantial sources of vibration. Therefore, impacts would be less than significant. No mitigation or further study is required.

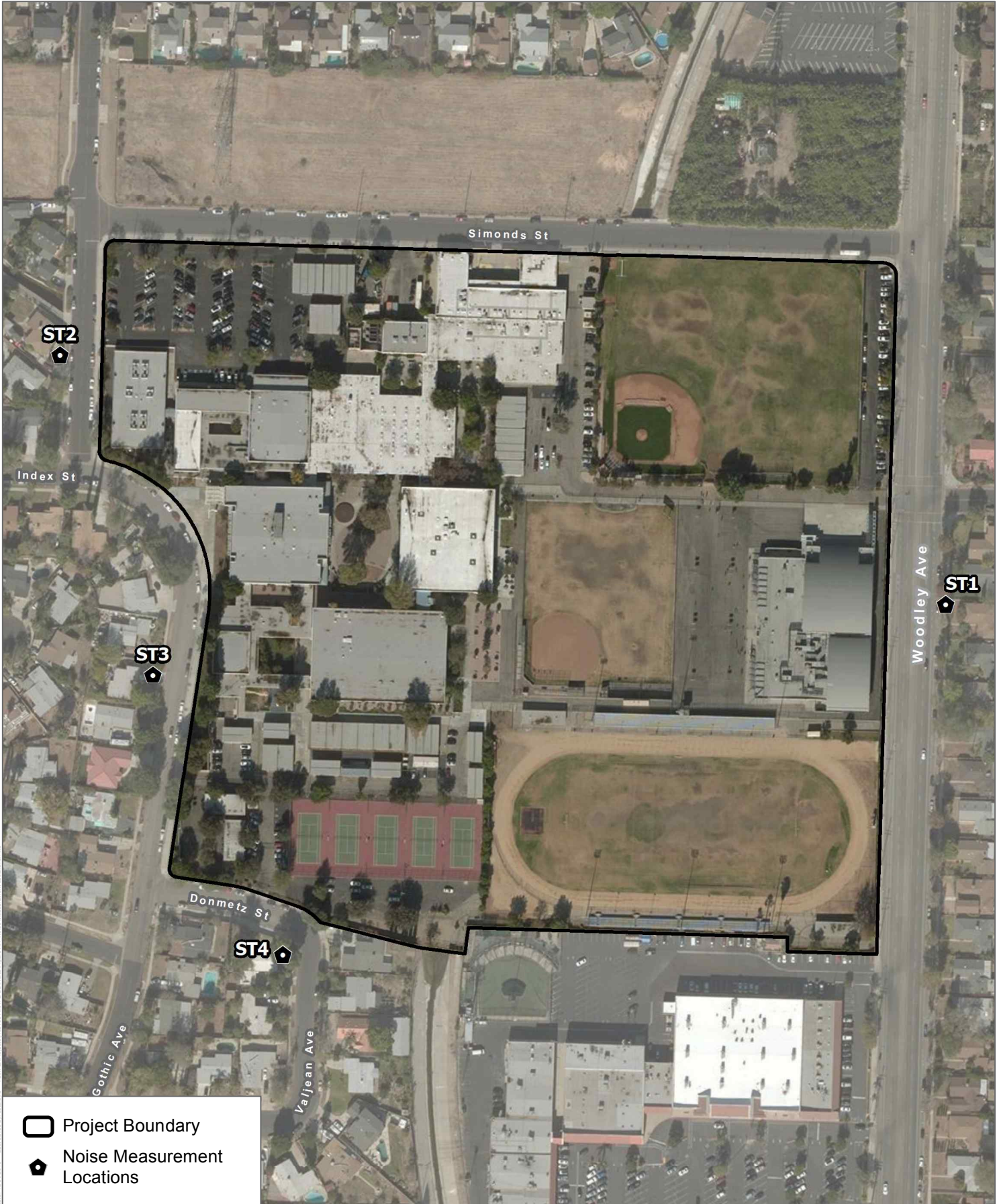
- c) **For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?**



No Impact. The closest public airport to the Project site is Van Nuys Airport, which is located approximately 3.8 miles south of the Project site in the City of Los Angeles. The airport is a general aviation facility owned and operated by Los Angeles World Airports.¹⁰⁸ According to the Los Angeles County Airport Land Use Plan, the airport's 65 dBA CNEL noise contour would be located approximately 3.3 miles from the Project site. No private airstrips are located within the vicinity of the Project site.¹⁰⁹ Thus, air traffic noise associated with airports would not expose construction workers, staff, or students to excessive noise levels. Therefore, no impacts associated with airport noise would occur. No mitigation or further study is required.

¹⁰⁸ Los Angeles County Airport Land Use Commission. 2004. Los Angeles County Airport Land Use Plan. December 1, 2004. Accessed April 12, 2019. http://planning.lacounty.gov/assets/upl/data/pd_alup.pdf.

¹⁰⁹ Airtav.com. 2019. Accessed April 12, 2019. <https://www.airnav.com/airports/get>





-  Project Boundary
-  Noise Measurement Locations

SOURCE: BING Maps

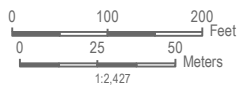


FIGURE 10

Noise Measurement Locations

John F. Kennedy High School Comprehensive Modernization Project

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

Explanation:

A Site Circulation Report prepared for the Project by LIN Consulting, Inc. in October 2018, included herein as Appendix H, supports the analyses below.

LAUSD has five SCs for minimizing impacts to pedestrian safety and two SCs for minimizing impacts to traffic. Those applicable to pedestrian safety at the Project site are included below.

LAUSD Standard Conditions of Approval

SC-PED-2	<p>LAUSD shall implement the applicable requirements and recommendations associated with the OEHS Traffic and Pedestrian Safety Program.</p> <p>OEHS Traffic and Pedestrian Safety Program LAUSD has developed these performance guidelines to minimize potential pedestrian safety risks to students, faculty and staff, and visitors at LAUSD schools. The performance guidelines include the requirements for: student drop-off areas, vehicle access, and pedestrian routes to school. School traffic/circulation studies shall identify measures to ensure separation between pedestrians and vehicles along potential pedestrian routes, such as sidewalks, crosswalks, bike paths, crossing guards, pedestrian and traffic signals, stop signs, warning signs, and other pedestrian access measures.</p>
SC-PED-3	<p>LAUSD shall implement the applicable sidewalk requirements outlined in the School Design Guide. LAUSD shall also coordinate with the responsible traffic jurisdiction/agency to implement infrastructure improvements prior to the opening of a school. Improvements shall include, but are not limited to:</p> <ul style="list-style-type: none"> Clearly designate passenger loading areas with the use of signage, painted curbs, etc. Install new walkway and/or sidewalk segments where none exist. Substandard walkway/sidewalk segments shall be improved to a minimum of eight feet wide. Provide other alternative measures that separate foot traffic from vehicular traffic, such as distinct travel pathways or barricades.
SC-PED-4	<p>LAUSD shall design the project to comply with the traffic and pedestrian guidelines in the School Traffic Safety Reference Guide.</p> <p>School Traffic Safety Reference Guide REF- 4492.1. This Reference Guide replaces Reference Guide 4492.0, School Traffic Safety, September 30, 2008. Updated information is provided, including new guidance on passenger loading zones and the Safety Valet Program. This guide sets forth requirements for traffic and pedestrian safety, and procedures for school principals to request assistance from OEHS, the Los Angeles Schools Police Department (LASPD), or the local police department regarding traffic and pedestrian safety. Distribution and posting of the Back to School Safety Tips flyer is required. This guide also includes procedures for traffic surveys, parking restrictions, crosswalks, advance</p>

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	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.
SC-PED-5	<p>LAUSD shall design new student drop-off, pick-up, bus loading areas, and parking areas to comply with the School Design Guide.</p> <p>School Design Guide. The Guide states student drop-off and pick-up, bus loading areas, and parking areas shall be separated to allow students to enter and exit the school grounds safely.</p>
SC-T-3	<p>LAUSD shall coordinate with the local City or County jurisdiction and agree on the following:</p> <ul style="list-style-type: none"> • Compliance with the local jurisdiction’s design guidelines for access, parking, and circulation in the vicinity of the project. • Scope of analysis and methodology for the traffic and pedestrian study, including trip generation rates, trip distribution, number and location of intersections to be studied, and traffic impact thresholds. • Implementation of SR2S, traffic control and pedestrian safety devices. • Fair share contribution and/or other mitigation measures for potential traffic impacts. • Traffic and pedestrian safety impact studies shall address local traffic and congestion during morning arrival times, and before and after evening stadium events. • Traffic study will use the latest version of Institute of Transportation Engineer’s (ITE) Trip Generation manual (or comparable guidelines) to determine trip generation rates (parent vehicles, school buses, staff/faculty vehicles, and delivery vehicles) based on the size of the school facility and the specific school type (e.g., Magnet, Charter, etc.), unless otherwise required by local jurisdiction. • Loading zones will be analyzed to determine the adequacy as pick-up and drop-off points. Recommendations will be developed in consultation with the local jurisdiction for curb loading bays or curb parking restrictions to accommodate loading needs and will control double parking and across-the-street loading.
SC-T-4	LAUSD shall require its Construction Contractors to submit a Construction Worksite Traffic Control Plan to OEHS for review prior to construction. The plan will show the location of any haul routes, hours of operation, protective devices, warning signs, access to abutting properties and applicable transportation related safety measures as required by local and State agencies. LAUSD shall encourage its Construction Contractor to limit construction-related trucks to off-peak commute periods.

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

Less than Significant Impact.

The proposed Project includes the comprehensive modernization of the existing school campus. Proposed improvements would include approximately 23,530 square feet of demolition, 149,630 square feet of remodeling, and the construction of a single 20,581 square-foot building. All of these improvements would take place on campus, and would not include any design features that would substantially increase vehicular and/or pedestrian safety hazards compared to those already present under existing conditions. The proposed Project would not change the existing use of the site, increase the student enrollment capacity of the school, or alter the sidewalk surrounding the Project site. Furthermore, LAUSD’s SC-PED-2 through SC-PED-5 would require that the adequacy of sidewalks, drop-off zones, bus loading zones, and parking lots be evaluated and updated according to the OEHS Traffic and Pedestrian Safety Program, the School Traffic Safety Reference Guide REF- 4492.1, and the School Design Guide.

During construction-related activities, temporary increases in vehicular traffic associated with the movement of construction workers and construction equipment to and from the Project site could temporarily increase vehicular and/or pedestrian safety hazards in the Project vicinity. However, SC-T-3 and SC-T-4 would require



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that the construction Contractor submit a Construction Worksite Traffic Control Plan and that LAUSD coordinates with the applicable regulatory agencies to minimize construction-related traffic impacts. As such, construction-related vehicular and/or pedestrian safety hazards would be reduced to a less-than-significant level.

The proposed Project would not increase vehicular and/or pedestrian safety hazards compared to those hazards present under existing conditions. Furthermore, with implementation of SC-PED-1 through SC-PED-5, SC-T-3 and SC-T-4, existing deficiencies that pose a risk to vehicular and pedestrian safety would be evaluated and improvements made according to the OEHS Traffic and Pedestrian Safety Program, the School Traffic Safety Reference Guide REF- 4492.1, and the School Design Guide. As such, the proposed Project would not substantially increase vehicular and pedestrian safety hazards; but would rather improve vehicular and pedestrian circulation when compared to existing conditions. Impacts would be less than significant. No mitigation or further study is required.

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

Less than Significant Impact. The proposed Project would result in less than significant impacts after implementation of SC-PED-2 through SC-PED-5, SC-T-3, and SC-T-4 in relation to creating unsafe routes to school for students walking from local neighborhoods. The proposed Project would not change the existing use of the site, increase the capacity of the school, or alter the sidewalk surrounding the Project site.

During both construction and operation of the proposed Project, implementation of SC-PED-2 through SC-PED-5, SC-T-3, and SC-T-4 would be required to minimize pedestrian safety risks to students regarding sidewalk access. During construction, temporary increases in vehicular traffic associated with the movement of construction workers and construction equipment to and from the Project site would occur. However, construction workers would not be permitted to park on local streets and construction-related traffic and deliveries would be scheduled to avoid student pick-up/drop-off hours. Implementation of the above-mentioned SCs would ensure pedestrian safety during construction-related activities.

The Project site is an operational high school, which is located within a residential area and serves the local population. As the proposed Project is not designed or expected to increase the student enrollment or staffing at Kennedy HS, Project implementation would not result in additional vehicle trips. There would be no foreseeable shifts in traffic patterns as a result of Project implementation. During both construction and operation, implementation of the SCs listed above would be required to minimize pedestrian safety risks to students. Therefore, the proposed Project would result in less than significant impacts in relation to creating unsafe routes to school. No mitigation or further study is required.

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

Less than Significant Impact. The Project site is located approximately 700 feet northeast of SR-118; however, the portion of SR-118 that is near the Project site is contained by retaining walls, and vehicular traffic on the SR-118 would not pose a larger-than-normal safety hazard to students traveling to school. The Project site is bound by several smaller arterials, including Simmonds Street to the north, Woodley Avenue to the east, Gothic Avenue to the west, and a portion of Donmetz Street to the south. As described in Section XIV(a),

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numerous circulation and safety deficiencies exist on these roadways under existing conditions and, thus, pose an existing safety hazard to students and the general public. However, with Project implementation of SC-PED-2 through SC-PED-5, SC-T-3, and SC-T-4, these safety hazards would be reduced to a less-than-significant level. No mitigation or further study is required.



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

Explanation:

The analyses in this section are supported by information taken from the General Plan and the California Department of Education.

LAUSD has one SC for minimizing impacts to population and housing; however, it is not applicable to the proposed Project because the Project would not displace any residences or businesses. Additionally, Projects under the SUP were determined to have a less than significant impact to population and housing.

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

No Impact. The Project site is currently an operational high school that serves approximately 2,349 students in 9th through 12th Grade.¹¹⁰ The proposed Project would not include any plans that would result in an increase in student enrollment or staff, but rather, is intended to improve, modernize and enhance the safety of the existing Campus. Additionally, the proposed Project would not include any new roads, housing, or associated infrastructure that could indirectly induce substantial population growth. As such, the Project would have no impact, either directly or indirectly, on population growth. No mitigation or further study is required.

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

No Impact. The proposed Project includes the improvement, modernization, and safety enhancement of the existing Kennedy HS. All planned remodeling, demolition, and construction activities would occur within the boundaries of the existing Campus, and no people or housing in the surrounding community would be displaced as a result of Project implementation. During construction, students vacated from their classrooms to accommodate the improvements associated with the Project would be relocated to temporary classrooms on site. Given this, no impact would occur. No mitigation or further study is required.

¹¹⁰ California Department of Education. 2019. Enrollment Multi-Year Summary by Grade – John F. Kennedy High Report. Accessed, May 9, 2019. <https://dq.cde.ca.gov/dataquest/dqcensus/EnrGrdYears.aspx?cds=19647331939941&aggllevel=school&year=2018-19>

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

Explanation:

The analyses in this section are supported by information taken from the City of Los Angeles Fire Department, the City of Los Angeles Police Department, and the City of Los Angeles Department of Parks and Recreation.

Projects implemented under the SUP were determined in the Program EIR to result in less than significant impacts to public services. LAUSD has two SCs for minimizing impacts to public services, and one SC for minimizing impacts to traffic that are applicable to public services. Applicable SCs related to public services impacts associated with the proposed Project are provided below:

LAUSD Standard Conditions of Approval	
SC-PS-1	If necessary, LAUSD shall: <ul style="list-style-type: none"> Have local fire and police jurisdictions review all construction and site plans prior to the State Fire Marshall's final approval. Provide a full site plan for the local review, including all buildings, both existing and proposed; fences; drive gates; retaining walls; and other construction affecting emergency vehicle access, with unobstructed fire lanes for access indicated.
SC-PS-2	LAUSD shall implement emergency preparedness and response procedures in all schools as required in LAUSD References, Bulletins, Safety Notes, and Emergency Preparedness Plans.
SC-T-4	LAUSD shall require its Construction Contractors to submit a Construction Worksite Traffic Control Plan to OEHS for review prior to construction. The plan will show the location of any haul routes, hours of operation, protective devices, warning signs, access to abutting properties and applicable transportation related safety measures as required by local and State agencies. LAUSD shall encourage its Construction Contractor to limit construction-related trucks to off-peak commute periods.

a) Fire protection?

Less than Significant Impact. The Los Angeles Fire Department (LAFD) provides fire protection services to Kennedy HS under existing conditions. The Project site is within the service boundary of LAFD fire station 18, located at 12050 Balboa Boulevard, and fire station 75, located at 15345 San Fernando Mission. Fire station



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18 is located 1.2 miles northwest of the Project site. Fire station 75 is located one mile east of the Project site.¹¹¹ Both fire station 18 and fire station 75 have an operational response time of between 5 minutes and 6 minutes and 37 seconds depending on the priority of the call.¹¹² Fire protection service needs, and the efficiency of the fire department's response to calls for emergency services, are generally correlated to population size. As stated in Section XV(a), implementation of the proposed Project would not increase enrollment at Kennedy HS and would not induce population growth in the surrounding area. As such, impacts to fire protection services as a result of an increase in population and calls to service would not occur with Project implementation. The LAFD would not need new or physically altered governmental facilities as a result of Project implementation.

During Project construction, the presence of construction equipment and vehicles on site and on surrounding roadways could result in slight traffic delays that may affect emergency service response times, including fire protection service response times. However, SC-PS-1, SC-PS-2, and SC-T-4 require that LAUSD take precautionary measures, such as implementing a Construction Worksite Traffic Control Plan, to guarantee that emergency access is provided to the Project site and to the surrounding area throughout construction and operation of the proposed Project. Implementation of these SCs would ensure that impacts to fire protection services would be less than significant, and no new or expanded fire protection facilities would be needed. No mitigation or further study is required.

b) Police protection?

Less than Significant Impact. The Los Angeles Police Department (LAPD) provides police protection services to Kennedy HS under existing conditions. The Project site is within LAPD's Devonshire Area service boundary.¹¹³ The police station servicing the Devonshire Area is located at 10250 Etiwanda Avenue, approximately 2.7 miles southwest of the Project site.

Police protection service needs, and the efficiency of the police department's response to calls for emergency services, are generally correlated to population size. As stated in Section XV(a), implementation of the proposed Project would not increase enrollment at Kennedy HS and would not induce population growth in the surrounding area. As such, impacts to police protection services as a result of an increase in population and calls to service would not occur with Project implementation. The LAPD would not need new or physically altered governmental facilities as a result of Project implementation. During Project construction, the presence of construction equipment and vehicles on site and on surrounding roadways could result in slight traffic delays that may affect emergency service response times, including police protection service response times. However, with implementation of SC-T-4, which requires the contractor to prepare a Construction Worksite Traffic Control Plan, any potential traffic delays affecting emergency service response times would be less than significant. No mitigation or further study is required.

¹¹¹ City of Los Angeles Fire Department (Website). 2019. Fire Station List. Accessed, May 17, 2019. <https://www.lafd.org/fire-stations/station-results>.

¹¹² City of Los Angeles Fire Department (Website). 2019. FireStatLA. Accessed, May 17, 2019. <http://www.lafd.org/fsla/stations-map>.

¹¹³ City of Los Angeles Police Department (Website). 2019. LAPD Service Area Map. Accessed, May 17, 2019. http://assets.lapdonline.org/assets/pdf/Citywide_09.pdf.

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c) Schools?

No Impact. The proposed Project would not result in the need for new or expanded school facilities other than those already proposed as part of the Project, and consequently evaluated in this IS/MND. The need for new or expanded school facilities is generally correlated to substantial population growth. The proposed Project would not include the construction of any infrastructure or housing that would directly or indirectly induce significant population growth in the surrounding area. Instead, the proposed Project would serve to provide the existing student population at Kennedy HS with updated and safe learning facilities. As such, Project implementation would not result in the need for new or expanded school facilities. No impact would occur and no mitigation or further study is required.

d) Parks?

No Impact. The proposed Project would not result in the need for new or expanded park facilities. The closest parks to the Project site are Petit Park and Granada Hills Recreation Center, located 0.5 mile south of the Project site.¹¹⁴ The need for new or expanded parks is generally correlated to substantial population growth. The proposed Project would not include the construction of any infrastructure or housing that would directly or indirectly induce significant population growth in the surrounding area. Instead, the proposed Project would serve to provide the existing student population at Kennedy HS with updated and safe learning facilities. Pursuant to California Education Code Section 38131.b, also known as the Civic Center Act, school facilities would be available during off-school hours for permitted use by public organizations which would add to the available recreation space in the community. With the availability of shared-use open space for recreation onsite, the Project is anticipated to have a beneficial effect on the community. As such, Project implementation would not result in the need for new or expanded parks. No impact would occur and no mitigation or further study is required.

e) Other public facilities?

No Impact. The proposed Project would not result in the need for new or expanded public facilities, such as libraries and government administrative buildings. The need for new or expanded public facilities is generally correlated to substantial population growth. The proposed Project would not include the construction of any infrastructure or housing that would directly or indirectly induce significant population growth in the surrounding area. Instead, the proposed Project would serve to provide the existing student population at Kennedy HS with updated and safe learning facilities. As such, Project implementation would not result in the need for new or expanded public facilities. No impact would occur and no mitigation or further study is required.

¹¹⁴ City of Los Angeles Department of Parks and Recreation (Website). 2019. Parks Map. Accessed, May 17, 2019. <https://www.laparks.org/parks>.



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

Explanation:

The analyses in this section are supported by information taken from the City of Los Angeles Department of Parks and Recreation. Projects implemented under the SUP were determined in the Program EIR to result in less than significant impacts to recreation.

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

No Impact. The proposed Project would not result in 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. The closest parks to the Project site are Petit Park and Granada Hills Recreation Center, located 0.5 mile south of the Project site. The rapid physical deterioration of park facilities is usually correlated to overuse due to a lack of additional/alternative facilities to accommodate a rapidly growing population. The proposed Project would not include the construction of any infrastructure or housing that would directly or indirectly induce significant population growth in the surrounding area. Instead, the proposed Project would serve to provide the existing student population at Kennedy HS with updated and safe learning facilities. Pursuant to California Education Code Section 38131.b, also known as the Civic Center Act, school facilities would be available during off-school hours for permitted use by public organizations which would add to the available recreation space in the community. With the availability of shared-use open space for recreation onsite, the Project is anticipated to have a beneficial effect on the community. As such, Project implementation would not result in any additional use of existing neighborhood and regional parks such that physical deterioration would occur. As such, no impact would occur and no mitigation or further study is required.

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

No Impact. The proposed Project would not result in the need for new or expanded park facilities. The closest parks to the Project site are Petit Park and Granada Hills Recreation Center, located 0.5 mile south of the Project site. The need for new or expanded parks is generally correlated to substantial population growth. The proposed Project would not include the construction of any infrastructure or housing that would directly or indirectly induce significant population growth in the surrounding area. Instead, the proposed Project would serve to provide the existing student population at Kennedy HS with updated and safe learning facilities. As

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such, Project implementation would not result in the need for new or expanded parks. No impact would occur and no mitigation or further study is required.

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

Explanation:

The analyses in this section are supported by information obtained from the City's Mobility Plan 2035, the City's Complete Streets Design Guide, and a Site Circulation Report, prepared by LIN Consulting, Inc. in October 2018 (Appendix H).

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

LAUSD Standard Conditions of Approval	
SC-T-2	<p>LAUSD shall implement the applicable vehicular access and parking design guidelines during the planning process.</p> <p>School Design Guide Vehicular access and parking shall comply with the Vehicular Access and Parking guidelines of the School Design Guide. The Design Guide contains the following regulations related to traffic:</p> <ul style="list-style-type: none"> • Parking Space Requirements • General Parking Guidelines • Vehicular Access and Pedestrian Safety • Parking Structure Security
SC-T-3	<p>LAUSD shall coordinate with the local City or County jurisdiction and agree on the following:</p> <ul style="list-style-type: none"> • Compliance with the local jurisdiction's design guidelines for access, parking, and circulation in the vicinity of the project. • Scope of analysis and methodology for the traffic and pedestrian study, including trip generation rates, trip distribution, number and location of intersections to be studied, and traffic impact thresholds. • Implementation of SR2S, traffic control and pedestrian safety devices. • Fair share contribution and/or other mitigation measures for potential traffic impacts. • Traffic and pedestrian safety impact studies shall address local traffic and congestion during morning arrival times, and before and after evening stadium events.



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	<ul style="list-style-type: none"> • Traffic study will use the latest version of Institute of Transportation Engineer's (ITE) Trip Generation manual (or comparable guidelines) to determine trip generation rates (parent vehicles, school buses, staff/faculty vehicles, and delivery vehicles) based on the size of the school facility and the specific school type (e.g., Magnet, Charter, etc.), unless otherwise required by local jurisdiction. • Loading zones will be analyzed to determine the adequacy as pick-up and drop-off points. Recommendations will be developed in consultation with the local jurisdiction for curb loading bays or curb parking restrictions to accommodate loading needs and will control double parking and across-the-street loading.
SC-T-4	LAUSD shall require its Construction Contractors to submit a Construction Worksite Traffic Control Plan to OEHS for review prior to construction. The plan will show the location of any haul routes, hours of operation, protective devices, warning signs, access to abutting properties and applicable transportation related safety measures as required by local and State agencies. LAUSD shall encourage its Construction Contractor to limit construction-related trucks to off-peak commute periods.

Applicable Plans and Policies

Mobility Plan 2035: A General Plan Element

The General Plan's Mobility Plan 2035, outlines five goals that encompass the City's strategic approach to providing varied and viable mobility for all residents.¹¹⁵ These overarching goals are:

- Safety First
- Access for All
- World Class Infrastructure
- Collaboration, Communication and Informed Choices
- Clean Environment and Healthy Communities

Complete Streets Design Guide

The Complete Streets Design Guide accompanies Mobility Plan 2035. The Complete Streets Design Guide provides a compilation of design concepts and best practices that promote the major tenets of Complete Streets within the City of Los Angeles—safety and accessibility. The Guide is meant to supplement existing engineering practices and requirements in order to meet the goals of Complete Streets.¹¹⁶

California's Complete Streets Act of 2008 (AB 1358)

AB 1358 was signed into effect in 2008 due to the state's rising concern over vehicle-related greenhouse gas emissions and their effect on the environment, specifically on global warming. AB 1358 aims to "shift the transportation mode share from single passenger cars to public transit, bicycling, and walking" as part of short-

¹¹⁵ City of Los Angeles. 2016. Mobility Plan 2035: A General Plan Element. Accessed, May 21, 2019. <https://planning.lacity.org/documents/policy/mobilityplnmemo.pdf>.

¹¹⁶ City of Los Angeles. 2016. Complete Streets Design Guide. Accessed, May 21, 2019. <https://planning.lacity.org/documents/policy/CompleteStreetDesignGuide.pdf>.

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and long-term planning goals in order to achieve a reduction in the number of vehicle miles traveled and in associated greenhouse gas emissions.¹¹⁷

Existing Conditions

The Project site is generally bound by Simonds Street to the north, Woodley Avenue to the east, Gothic Avenue to the west, and Donmetz Street to the south. Gothic Avenue is a north-south running, two-way street with one lane in each direction that binds the Project site's western perimeter. Kennedy High School entrance gate fronts Gothic Avenue and serves as primary access for students via a south-north running passenger loading/school drop-off zone. Fire department and emergency vehicle access to the Project site is also provided on Gothic Avenue and Simonds Street via separate fire lanes that lead to the surface parking lot on the northwestern corner of the Project site.

Limited access to the northwestern surface parking lot is also provided via a gated driveway on Simonds Street, a small two-way local street that runs east-west across the Project site's northern perimeter and that connects Gothic Avenue and Woodley Avenue. Access to the northeastern surface-parking strip is provided via Woodley Avenue. Woodley Avenue is a large north-south running roadway, classified as an Avenue II by the City of Los Angeles, with two lanes in each direction, with a 10-foot-wide center left-turn lane dividing the opposing lanes. Woodley Avenue includes dedicated Class II bike lanes in each direction and provides pedestrian access to the Project side via the public sidewalk system.

Limited access to the associated Jane Addams Continuation High School is provided via Donmetz Street, a short, paved local street that joins Valjean Avenue to Gothic Avenue.

Including the two parking lots mentioned above, Kennedy High School has six on-site parking lots: two main staff and faculty parking lots, two main student parking lots, and two staff and faculty parking lots shared with Jane Addams Continuation High School. These parking spaces combined provide a total of approximately 250 parking spaces (marked and unmarked), including 11 accessible parking spaces and three van-accessible parking spaces. Additional on-street parking is available on the north side of Simonds Street, on both sides of Woodley Avenue, and on Donmetz Street while limited on-street parking is also available on Gothic Avenue and Index Street. Approximately 50 bicycle racks are provided in the student parking lot on the northeast corner of the Campus.

Public transit to the Project site is provided via Metro Local Route 237, which has two bus stops: the northbound Metro 237 on the northeast corner of Index Street and the southbound Metro 237 on the southwest corner of Index Street. The Metro Local Route 237 operates seven days a week and runs between Granada Hills and Hollywood via Woodley Avenue. The Site Circulation Report for this Project is included as Appendix H.¹¹⁸

¹¹⁷ California Legislative Information (website). 2019. California Complete Streets Act of 2008. Accessed, May 21, 2019. http://leginfo.ca.gov/faces/billNavClient.xhtml?bill_id=200720080AB1358.

¹¹⁸ LIN Consulting, Inc. 2018. Site Circulation Report: LAUSD School Modernization Project – John F. Kennedy High School. Included Herein as Appendix H.



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

Less than Significant Impact. The proposed Project would not conflict with a program, ordinance, or policy addressing the circulation system, including the City's General Plan Mobility Element, the Complete Streets Design Guide, and AB 1358.

Construction

During construction-related activities, there would be a slight increase in vehicular traffic at the Project site and in the surrounding vicinity due to the movement of construction workers and construction equipment to and from the Project site. As shown in Table 6, the highest number of construction-related trips would occur during the "Site Preparation and Modernization" phase of construction, when approximately 36 trucks (35 haul trucks and one water truck) and an average of 50 construction workers would be traveling to and from the Project site per day. Assuming that school would be in session during this phase of construction, construction-related activities would add approximately 86 round trips per day. However, construction-related traffic and deliveries would be scheduled to avoid student drop-off and pick-up hours and noise-sensitive hours as coordinated with the school administration. Construction activities, and the associated increase in vehicle trips in the Project vicinity, would be temporary in nature. Additionally, LAUSD would implement SC-T-4, which requires that the construction contractors enhance vehicular and pedestrian safety and efficiency by submitting a Construction Worksite Traffic Control Plan to OEHS for review prior to construction. With coordination with Kennedy HS administration and implementation of SC-T-4, the proposed Project would align with the goals of the City's General Plan Mobility Element and with the Complete Streets Design Guide. As such, the proposed Project would have a less than significant impact to traffic during construction and would provide safe and efficient access to the Project site.

Operation

The proposed Project would implement SC-T-2 and SC-T-3, which would ensure that the LAUSD adhered to the School Design Guidelines and with local jurisdictions in order to ensure adherence to local design guidelines for access, parking, and circulation in the vicinity of the Project. As such, upon Project operation, Kennedy High School would provide safe and accessible circulation, access and parking, and, as such, would be consistent with the City's General Plan Mobility Element and with the Complete Streets Design Guide. Furthermore, the proposed Project would not change the use of the site or increase the capacity of the school, and, as such, would not result in a significant increase in Vehicle Miles Travelled (VMT) at buildout. Given this, the proposed Project would be consistent with AB 1358.

Given the above, the proposed Project would have a less than significant impact as it pertains to conflicts with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. No mitigation or further study is required.

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

Less than Significant Impact. According to State CEQA Guidelines Section 15064.3(b)(1), "Generally, projects within one-half mile of either an existing major transit stop or stop along an existing high-quality transit corridor should be presumed to cause less than significant transportation impacts." As stated above, Woodley

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Avenue is categorized as an Avenue II by the City of Los Angeles. An Avenue II is considered a secondary highway with one or two lanes in each direction, a right-of-way width of 56 feet, and a typical sidewalk width of 15 feet.¹¹⁹ Metro Local Route 237 bus stop is located immediately adjacent to the Project site and would serve as a major transit stop for the school. As such, per State CEQA Guidelines Section 15064.3(b)(1), the proposed Project would have a less than significant impact relative to transportation. However, further discussion of potential transportation effects are provided below for informational purposes.

Construction

As stated above in Section XVIII(a), during construction-related activities, there would be a slight increase in vehicular traffic and resultantly in VMT at the Project site and in the surrounding vicinity due to the movement of construction workers and construction equipment to and from the Project site. However, construction-related traffic and deliveries would be scheduled to avoid student drop-off and pick-up hours and noise-sensitive hours as coordinated with the school administration. Construction activities, and the associated increase in VMT in the Project vicinity, would be temporary in nature and would not represent a permanent, significant increase in VMT as a result of the proposed Project. Additionally, as per State CEQA Guidelines section 15064.3(b)(1), projects within one-half mile of either an existing major transit stop or stop along an existing high-quality transit corridor should be presumed to cause less than significant transportation impacts. As described above, the Project site is located adjacent to a transit stop. For these reasons, construction of the proposed Project would be consistent with State CEQA Guidelines Section 15064.3(b). Impacts would be less than significant. No mitigation or further study is required.

Operation

The Project site functions as an operational high school under existing conditions. The proposed Project includes the modernization of the existing high school Campus and is not designed or expected to increase the current capacity of the Campus. Therefore, it would not result in a permanent, significant increase in VMT. Upon buildout, public transit to the Project site would continue to be provided by Metro Local Route 237, which has two bus stops: the northbound Metro 237 on the northeast corner of Index Street and the southbound Metro 237 on the southwest corner of Index Street. The Metro Local Route 237 operates seven days a week and runs between Granada Hills and Hollywood via Woodley Avenue. Additionally, Woodley Avenue includes dedicated Class II bike lanes in each direction and provides pedestrian access to the Project site via the public sidewalk system. According to the SUP Program EIR, approximately 50.9% of students within the City already utilize alternative transportation (school bus, walking, and bicycling).¹²⁰ Given that 50.9% of students already utilize alternative modes of transportation and that the proposed Project would not increase student enrollment or staff, the proposed Project would not add significant VMT upon operation. Additionally, as per State CEQA Guidelines Section 15064.3(b)(1), Projects within one-half mile of either an existing major transit stop or stop along an existing high-quality transit corridor should be presumed to cause less than significant transportation impacts. As described above, the Project site is located adjacent to a transit stop. As

¹¹⁹ City of Los Angeles. 2016. Complete Streets Design Guide. Accessed, May 21, 2019. <https://planning.lacity.org/documents/policy/CompleteStreetDesignGuide.pdf>.

¹²⁰ City of Los Angeles Unified School District. 2014. School Upgrade Program EIR. Pg. 5.17-8. Accessed, May 21, 2019. https://achieve.lausd.net/cms/lib08/CA01000043/Centricity/domain/135/pdf%20files/Program_EIR_School_Upgrade_Program_Full.pdf.



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such, the proposed Project would have a less than significant impact pertaining to conflicts with State CEQA Guidelines Section 15064.3(b) upon operation. No mitigation or further study is required.

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

No Impact. The proposed Project would adhere to the SC-T-2 and SC-T-3, which would guarantee that any improvements to access, circulation, and parking be done in accordance with the School Design Guidelines and in coordination with local jurisdictions. As such, the proposed Project would not substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment). No impact would occur. No mitigation or further study is required.

d) Result in inadequate emergency access?

No Impact. Emergency access to the Project site would be maintained throughout Project construction through implementation of SC-T-4, which requires that the Contractor submit a Construction Worksite Traffic Control Plan to OEHS for review prior to construction. Additionally, implementation of SC-T-2 and SC-T-3 would ensure that any improvements to access, circulation, and parking would be designed according to the School Design Guidelines and in coordination with local jurisdictions. As such, no impacts to emergency access would occur. No mitigation or further study is required.

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Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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XIX. TRIBAL CULTURAL RESOURCES.

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

Yes No

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

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

Explanation:

The analyses in this section are supported by information obtained from: a records search of the NAHC SLF; written communication with the Native American tribes known to have a historic affiliation with the regional Project area; a CHRIS records search; and government-to-government consultation as specified by Assembly Bill (AB) 52 for the proposed Project.

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

LAUSD Standard Conditions of Approval

SC-TCR-1	All work shall stop within a 30 foot radius of the discovery. Work shall not continue until the discovery has been assessed by a qualified Archaeologist. Based on this initial assessment the affiliated Native American Tribal representative has contacted and consulted to provide as-needed monitoring or to assist in the accurate assessment, recordation, and if appropriate, recovery of the resources, as required by the District.
SC-TCR-2	In the event that Tribal cultural resources are identified, the Archaeologist will retain a Native American Monitor to begin monitoring ground disturbance activities. The Native American Monitor shall be approved by the District and must have at least one or more of the following qualifications: <ul style="list-style-type: none"> • At least one year of experience providing Native American monitoring support during similar construction activities. • Be designated by the Tribe as capable of providing Native American monitoring support. • Have a combination of education and experience with Tribal cultural resources.



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Prior to reinitiating construction, the construction crew(s) will be provided with a brief summary of the sensitivity of Tribal cultural resources, the rationale behind the need for protection of resources, and information on the initial identification of Tribal cultural resources. This information shall be included in a worker's environmental awareness program that is prepared by LAUSD for the project (as applicable). Subsequently, the Monitor shall remain on-site for the duration of the ground-disturbing activities to ensure the protection of any other potential resources.

The Native American Monitor will complete monitoring logs on a daily basis. The logs will provide descriptions of the daily activities, including construction activities, locations, soil, and any Tribal cultural resources identified.

NAHC Consultation

Native American coordination for the proposed Project was initiated on February 11, 2019. As part of the process of identifying cultural resources within or near the proposed Project site, the NAHC was contacted to request a review of the SLF. The NAHC emailed a response on February 13, 2019 (Appendix D), and stated that the search did indicate the presence of Native American cultural resources within the proposed Project site or in the immediate vicinity. The NAHC provided a contact list of 19 Native American individuals and/or tribal organizations who may have knowledge of Native American cultural resources in or near the proposed Project site (see Appendix D for details).

Letters containing a brief project description and summarizing the results of the CHRIS records search were sent via certified mail to each of the 19 representatives on February 18, 2019. This coordination was conducted for informational purposes only and does not constitute formal government-to-government consultation as specified by AB 52, which is discussed further below. Three letters, including those addressed to Fred Collins, Mark Vigil, and Raudel Banuelos were unable to be delivered. All other letters were successfully delivered. Four responses were received:

- Beverly Salazar Folkes, contacted Dudek via telephone on February 22, 2019, on behalf of the Fernandeano Tataviam Band of Mission Indians. Ms. Folkes stated that the proposed Project site and vicinity was traditionally affiliated with the Santa Ynez Band of Mission Indians and was sensitive for Native American related resources. Ms. Folkes recommended that an archaeological monitor and a Native American monitor be retained to monitor ground disturbing activities associated with the Project.
- Patrick Tumamait contacted Dudek via telephone on February 22, 2019, on behalf of the Barabareño/Ventureno Band of Mission Indians. Mr. Tumamait left a message stating that he had concerns about the proposed Project and that the proposed Project was located in the vicinity of archaeological resources. A follow-up telephone call was made to Mr. Tumamait on February 22, 2019, which went to voicemail, and again on February 25, 2019. During the February 25, 2019 call, Mr. Tumamait stated that the area was sensitive for Native American resources and was concerned with the fact that intensive archaeological testing and research has never been conducted at the site. To mitigate these concerns, Mr. Tumamait suggested retaining a Native American monitor to be present during all ground disturbing activities.
- Jairo Avila contacted Dudek via email on February 28, 2019, on behalf of the Fernandeano Tataviam Band of Mission Indians. Mr. Avila stated that the Fernandeano Tataviam Band of Mission Indians is in contact with LAUSD regarding the proposed Project and considers the

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proposed Project site highly sensitive, though no cultural resources have been reported within the boundaries of the proposed Project site.

- Brandy Salas contacted Dudek via email on March 1, 2019, on behalf of the Gabrieleno Band of Mission Indians. Ms. Salas requested to have formal consultation with the lead agency should any ground disturbing activities take place in support of the proposed Project.

The results of the SLF Search, the tribal information letters sent out to all tribal representatives, and all documentation received from Native American groups and individuals is provided in Appendix D.

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)?

Less than Significant Impact. As described under Section IV of this MND, in a SLF results letter dated February 13, 2019, the NAHC stated that the SLF search was completed with positive results, though the NAHC did not specify whether or not any TCRs had been identified within the proposed Project site. Additionally, the CHRIS records search identified three resources within 0.5 mile (804 meters) of the proposed Project site, two of which include Native American or prehistoric cultural resources; however, none of these resources intersect or overlap the proposed Project site. Due to the fact that no listed or eligible for listing CRHR, or locally registered resources are present within the proposed Project site, the proposed Project would have a less-than-significant impact on TCRs. No resource-specific mitigation or further study is required.

b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public 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. The proposed Project is subject to compliance with AB 52 (PRC 21074), which requires consideration of impacts to “tribal cultural resources” as part of the CEQA process, and that the lead agency notify California Native American Tribal representatives (that have requested notification) who are traditionally or culturally affiliated with the geographic area of the proposed Project. Seven NAHC-listed California Native American Tribal representatives were sent letters by LAUSD on January 8, 2018. The letters contained a Project description, outline of AB 52 timing, request for consultation, and contact information for the appropriate lead agency representative. Contacted individuals included Andrew Salas, Gabrieleno Band of Mission Indians - Kizh Nation, Jairo Avila, Fernandeno Tataviam Band of Mission Indians, Charles Alvarez, Gabrielino-Tongva Tribe, Robert Dorame, Gabrielino/Tongva Indians of California, Sandonne Goad, Gabrielino/Tongva Nation, Anthony Morales, Gabrielino/Tongva San Gabriel Band of Mission Indians, and Linda Candelaria, Gabrielino-Tongva Tribe. The confidential documentation pertaining to AB 52 consultation are on file at the office of LAUSD.

In an effort to proactively reach out to tribes with a cultural affiliation to the proposed Project site, LAUSD initiated AB52 Consultation in January 2019 and mailed notification letters to all contacts who have previously requested Project notification. To date, two responses have been received and are summarized as follows:



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Brandy Salas, representing Chairman Andrew Salas and the Gabrieleño Band of Mission Indians - Kizh Nation, contacted LAUSD on January 9, 2019 via email requesting formal consultation regarding the proposed Project. Consultation with the Gabrieleño Band of Mission Indians-Kizh Nation occurred on May 21, 2019. As a result of this consultation, the Gabrieleño Band of Mission Indians-Kizh Nation, provided mitigation measures that they suggested LAUSD utilize for the various LAUSD projects proposed. However, the current proposed Project is not one of the projects highlighted by the Gabrieleño Band of Mission Indians - Kizh Nation for mitigation to be considered. As such, in the event that TCRs are uncovered, LAUSD has decided to include Tribal Cultural Resources (TCR) Standard Conditions (SC) 1 and 2.

Jairo Avila, of the Fernandeno Tataviam Band of Mission Indians, contacted LAUSD on January 29, 2019 via email requesting formal consultation and stating that the proposed Project is located within traditional Tataviam territory and in the vicinity of Native American related cultural resources. Additionally, Mr. Avila provided a confidential map on file with the Fernandeno Tataviam Band of Mission Indians, to show sensitive tribal cultural resource areas within distance of the proposed Project. Mr. Avila requested excavation plans, geotechnical reports, and any environmental impact report or archaeological investigation reports prepared for the proposed Project. Consultation with the Fernandeno Tataviam Band of Mission Indians occurred on April 2, 2019, and as a result of this consultation, LAUSD has decided to include SC-TCR-1 and SC-TCR-2 and incorporate language from the suggested mitigation measures from the Fernandeno Tataviam Band of Mission Indians following LAUSD's SCs, as follows:

- **MM-TCR-1:** In the event that Native American cultural resources are discovered during Project activities, all work in the immediate vicinity of the find (within a 60-foot buffer) shall cease and a qualified archaeologist meeting Secretary of Interior standards shall assess the find. The affiliated Native American Tribal representative shall be contacted to consult if any such find occurs. The archaeologist shall complete all relevant California State Department of Parks and Recreation (DPR) 523 Series forms to document the find and submit this documentation to LAUSD, the affiliated Native American Tribal representative, and consulting Tribes. If the Native American cultural resource is determined to be significant, as defined by the affiliated Native American Tribal representative, a Native American archaeological monitor retained by the qualified Project Archaeologist and approved by the District, shall be present for all ground disturbing activities that occur within the proposed Project area. The archaeologist and Tribal monitor(s) will have the authority to request ground disturbing activities cease within the immediate area of a discovery to assess potential finds in real time.
 - Any finds shall be subject to the Treatment and Disposition Plan, as described within MM-TCR-2.
- **MM-TCR-2:** LAUSD will consult with the affiliated Native American Tribal representative and consulting Tribes on the disposition and treatment of any artifacts or other cultural materials if encountered during the Project grading.

To date, no other responses have been received from the AB 52 NAHC-listed tribal contacts that have requested notification, regarding TCRs or other concerns about the proposed Project. AB 52 government-to-government consultation, initiated by LAUSD, acting in good faith and after a reasonable effort, has not resulted in the identification of a specific TCR within or near the proposed Project site determined by LAUSD to be significant

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pursuant to the criteria set forth in Public Resources Code Section 5024.1. However, the AB 52 consultation between LAUSD and Mr. Avila of the Fernandeno Tataviam Band of Mission Indians, suggests that there is still some potential for unknown subsurface TCRs to be impacted by the proposed Project. In the event that unknown subsurface TCRs are uncovered during construction ground disturbance, and such resources are not identified and avoided or properly treated, a potentially significant impact could result. As such, LAUSD has adopted two SCs for District Construction, Upgrade, and Improvement Projects that apply to the potential discovery and protection of TCRs (SC-TCR-1 and SC-TCR-2), including mitigation measures provided by the Fernandeno Tataviam Band of Mission Indians (MM-TCR-1 and MM-TCR-2). The implementation of the above mentioned preemptive measures would reduce the potentially significant impact to a less than significant impact.



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

Explanation:

The analyses in this section are supported by information obtained from the City's Urban Water Management Plan (UWMP), the Los Angeles Citywide General Plan Framework EIR, and the General Plan Conservation Element. Additionally, projects implemented under the SUP were determined in the Program EIR to result in less than significant impacts to utilities and service systems.

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

LAUSD Standard Conditions of Approval

SC-USS-1	<p>Consistent with current LAUSD requirements for recycling construction and demolition waste, the Construction Contractor shall implement the following solid waste reduction efforts during construction and demolition activities:</p> <p>School Design Guide. Establishes a minimum non-hazardous construction and demolition (C&D) debris recycling requirements of 75% by weight. Construction and demolition waste shall be recycled to the maximum extent feasible.</p> <p>Construction & Demolition Waste Management. This document outlines procedures for preparation and implementation, including reporting and documentation, of a Waste Management Plan for reusing, recycling, salvaging or disposal of non-hazardous waste materials generated during demolition and/or new construction to foster material recovery and re-use and to minimize disposal in landfills. Requires the collection and separation of all C&D waste materials generated on-site, reuse or recycling on-site, transportation to approved recyclers</p>
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	or reuse organizations, or transportation to legally designated landfills, for the purpose of recycling, salvaging and/or reusing a minimum of 75% of the C&D waste generated by weight.
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 relocating or upgrading any water facilities to reduce the potential for disruptions in service.
SC-USS-3	LAUSD shall provide an easily accessible area that services the entire school and is dedicated to the collection and storage of materials for recycling, including (at a minimum) paper, cardboard, glass, plastics, metals, and landscaping waste. There shall be at least one centralized collection point (loading dock), and the capacity for separation of recyclables where waste is disposed of for classrooms and common areas such as cafeterias, gyms, or multi-purpose rooms.
SC-GHG-1	During operation, LAUSD shall perform regular preventative maintenance on pumps, valves, piping, and tanks to minimize water loss.
SC-GHG-2	LAUSD shall utilize automatic sprinklers set to irrigate landscaping during the early morning hours to reduce water loss from evaporation.
SC-GHG-3	LAUSD shall reset automatic sprinkler timers to water less during cooler months and rainy season.

The Project site is currently served by the Tillman Water Reclamation Plant (TWRP). According to the Los Angeles Citywide General Plan Framework EIR, the TWRP was designed to provide secondary treatment for approximately 80 million gallons of wastewater per day (mgd).¹²¹ According to the City's 2015 UWMP, water for the City of Los Angeles is sourced from the Metropolitan Water District (MWD) (via Los Angeles Aqueduct, the State Water Project, and the Colorado River Aqueduct) and from local groundwater supplies.¹²² The Project site lies within the San Fernando Valley Groundwater Basin (SFB) system, which has historically provided as much as 92% of the City's groundwater supply, making the SFB the primary source of groundwater for the City of Los Angeles.

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

Less than Significant Impact. The proposed Project includes the improvement and modernization of the existing Kennedy HS Campus. Project implementation would include approximately 23,530 square feet of demolition, 149,630 square feet of remodeling, and the construction of a single 20,581 square-foot building. The proposed new classroom building would be connected to the existing utility infrastructure, all of which currently accommodates the school's utility demand under existing conditions. The proposed Project would not result in an increase in student enrollment or staff or in an associated increase in utility demand at the Project site. As such, the existing utility providers are anticipated to continue to supply utilities to the Project site and are not anticipated to require the construction or expansion of existing utility infrastructure in order to do so. Any improvements pertaining to the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunication facilities would be minor and would be done in accordance with SC-USS-1 and SC-USS-2. Additionally, these improvements are assumed under the Kennedy High School Modernization Project and, as such, are analyzed throughout this IS/MND.

¹²¹ City of Los Angeles. 1995. Los Angeles Citywide General Plan Framework Environmental Impact Report. Accessed, May 21, 2019. https://planning.lacity.org/HousingInitiatives/HousingElement/FrameworkEIR/GPF_DraftEIR/GPF_FEIR_DEIR_Title.pdf.

¹²² City of Los Angeles. 2015. Urban Water Management Plan. Accessed, May 20, 2019. <https://planning.lacity.org/eir/CrossroadsHwd/deir/files/references/M217.pdf>.



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As such, impacts to the environment pertaining to the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunication facilities would be less than significant. No mitigation or further study is required.

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

Less than Significant Impact. According to the City's 2015 UWMP, water for the City of Los Angeles is supplied by the City of Los Angeles Department of Water and Power (LADWP), which sources water from MWD (via Los Angeles Aqueduct, the State Water Project, and the Colorado River Aqueduct) and from local groundwater supplies.¹²³ The Project site lies within the SFB system, which has historically provided as much as 92% of the City of Los Angeles's groundwater supply, making the SFB the primary source of groundwater for the City of Los Angeles. According to the Geotechnical Report prepared for the Project, groundwater was not encountered up to 50.5 feet bgs at the Project site; however, it has been historically observed at 170 to 200 feet bgs at the Project site. The proposed Project would not include the construction of any wells and, thus, would not directly utilize groundwater. Rather, water to the Project site would be provided by the existing water utility infrastructure, which sources water for the Project site from the MWD and the SFB. According to the UWMP, the City Projects adequate groundwater production through the forecast year of 2040, in which approximately 92,000-acre-feet per year (AFY) would be available from the SFB under all weather conditions. With projected increases in local water supply development and conservation savings over the next 25 years, the UWMP estimates that LADWP's reliance on MWD water supplies will be reduced significantly from the current five-year average of 57 percent of total demand to 11 percent under average weather conditions and to 44 percent under single-dry year conditions by 2040.¹²⁴ Additionally, according to the MWD's UWMP, the MWD estimates sufficient supply through the planning year of 2040 in normal conditions as well as in single and multiple dry years.¹²⁵ Given the available water supply from local groundwater sources and given the adequate supply projected from MWD, the LADWP would be able to source sufficient water supplies to serve the project and foreseeable future development during normal, dry, and multiple dry years.

Construction

During construction-related activities, a slight increase in water demand may occur at the Project site; however, these impacts would be temporary in nature and would not impact LADWP's ability to serve the Project and other development. Thus, the proposed Project would have a less than significant impact relative to water supply during construction. No mitigation or further study is required.

¹²³ City of Los Angeles. 2015. Urban Water Management Plan. Accessed, May 20, 2019.
<https://planning.lacity.org/eir/CrossroadsHwd/deir/files/references/M217.pdf>.

¹²⁴ City of Los Angeles. 2015. Urban Water Management Plan. Pg. 8-1. Accessed, May 20, 2019.
<https://planning.lacity.org/eir/CrossroadsHwd/deir/files/references/M217.pdf>.

¹²⁵ The Metropolitan Water District of Southern California. 2016. Urban Water Management Plan. Accessed, June 27, 2019.
http://www.mwdh2o.com/PDF_About_Your_Water/2.4.2_Regional_Urban_Water_Management_Plan.pdf.

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Operation

The proposed Project would entail the modernization of an existing high school campus. The proposed Project would not result in an associated increase in student enrollment, and, as such, would not require increased water supply upon buildout relative to existing conditions. The existing school is included in the 2015 UWMP's estimations of existing water supply and projected water demand and supply. Given that the proposed Project would not result in an increase in student population and resultant water demand, LADWP would have sufficient water supplies available to serve the Project and reasonably foreseeable future development in the area during normal, dry, and multiple dry years. Thus, the proposed Project would have a less than significant impact relative to water supply during operation. No mitigation or further study is required.

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

No Impact. The Project site is currently served by the TWRP and accounted for in the TWRP's existing wastewater treatment capacity. According to the Los Angeles Citywide General Plan Framework EIR, the TWRP was designed to provide secondary treatment for approximately 80 mgd of wastewater.¹²⁶ Considering that the proposed Project would not result in increased enrollment and would not require increased wastewater treatment services, the TWRP would have adequate capacity to continue to serve the Project's demand. Therefore, the proposed Project would have no impact on the ability of the TWRP to provide wastewater treatment services to the Project site in addition to their existing commitments. No mitigation or further study is required.

d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

No Impact. The proposed Project would not negatively impact the provision of solid waste services or impair the attainment of solid waste reduction goals. The proposed Project would comply with SC-USS-1, which states that Kennedy High School must be consistent with current LAUSD requirements for recycling construction and demolition waste. Furthermore, the School Design Guide (as part of SC-USS-1) establishes a minimum non-hazardous construction and demolition debris recycling requirement of 75% by weight. In accordance with these requirements, construction and demolition waste would be recycled to the maximum extent feasible. Per SC-USS-1, the Construction & Demolition Waste Management program outlines procedures for preparation and implementation, including reporting and documentation, of a Waste Management Plan for reusing, recycling, salvaging, or disposal of non-hazardous waste materials generated during demolition and/or new construction to foster material recovery and reuse and to minimize disposal in landfills. Implementation of the proposed Project would comply with all City, County, and State solid waste diversion, reduction, and recycling mandates, including compliance with the City of Los Angeles Annual Report, Countywide Integrated Waste Management Plan (CIWMP), the LAMC, and LAUSD BMPs. Additionally, the student and staff population

¹²⁶ City of Los Angeles. 1995. Los Angeles Citywide General Plan Framework Environmental Impact Report. Accessed, May 21, 2019. https://planning.lacity.org/HousingInitiatives/HousingElement/FrameworkEIR/GPF_DraftEIR/GPF_FEIR_DEIR_Tide.pdf.



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would remain comparable to the most recent five years of enrollment. Therefore, there would be no impact relative to solid waste. No mitigation or further study is required.

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

No Impact. Implementation of the proposed Project would comply with all federal, state, and local management and reduction statutes and regulations related to solid waste. The proposed Project would comply with the California Green Building Code, the LAMC, and the LAUSD SCs pertaining to the management of solid waste. During the Project construction phase, SC-USS-1 requires that the Construction Contractor implement a solid waste reduction plan. For the operation and maintenance phase, SC-USS-3 requires that LAUSD provide an easily accessible area that services the entire school and is dedicated to the collection and storage of materials for recycling. Additionally, student enrollment would not increase as a result of the proposed Project, and the solid waste facilities that service the Project site would not be subject to increased demand for solid waste removal. Therefore, LAUSD would comply with all federal, state, and local statutes and regulations related to solid waste during construction and operation of the proposed Project. No mitigation or further study is required.

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

Explanation:

The analyses in this section are supported by information taken from the General Plan Safety Element and from a desktop review of the LAFD Fire Zone Map. Projects implemented under the SUP were determined in the Program EIR to result in less than significant impacts to wildland fire impacts.

The Program EIR does not list any SCs specific to wildland fires; however, there are two SCs pertaining to public services and transportation that are applicable to wildland fires, and included below.

LAUSD Standard Conditions of Approval

SC-PS-1	If necessary, LAUSD shall: Have local fire and police jurisdictions review all construction and site plans prior to the State Fire Marshall's final approval; Provide a full site plan for the local review, including all buildings, both existing and proposed; fences; drive gates; retaining walls; and other construction affecting emergency vehicle access, with unobstructed fire lanes for access indicated.
SC-T-4	LAUSD shall require its Construction Contractors to submit a Construction Worksite Traffic Control Plan to OEHS for review prior to construction. The plan will show the location of any haul routes, hours of operation, protective devices, warning signs, access to abutting properties and applicable transportation related safety measures as required by local and State agencies. LAUSD shall encourage its Construction Contractor to limit construction-related trucks to off-peak commute periods.



4. Environmental Checklist and Analysis

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

Less than Significant Impact. The Project site is within the boundaries of the Granada Hills North Neighborhood Council area within the City of Los Angeles in the County of Los Angeles. According to the General Plan's Safety Element, the Project site is not located within a designated wildfire hazard area and lies one mile southeast of the closest Very High Fire Hazard Severity Zone.¹²⁷ The City's General Plan Safety Element functions as the City's emergency response planning document and designates the Emergency Operations Organization (EOO) as the agency responsible for implementing emergency operations, including disaster response and recovery.¹²⁸ Additionally, the County's Emergency Management Agency (EMA) is responsible for implementing the Operational Area Emergency Response Plan for the County (OAERP).¹²⁹ The OAERP addresses the coordinated response to emergency situations associated with natural, man-made, and technological incidents.¹³⁰

The proposed Project would include approximately 23,530 square feet of demolition, 149,630 square feet of remodeling, and the construction of a single 20,581 square-foot building. All Project construction and demolition would take place on site and would not interfere with the EOO's or the EMA's ability to implement emergency operations in the event of a disaster. Additionally, the proposed Project would not include the construction of any roadways, structures, or associated infrastructure, the construction of which would impede the implementation of emergency procedures.

The County's Disaster Routes Map for the Valley Area labels SR-118 a primary disaster route, and Balboa Boulevard as a secondary disaster route.¹³¹ SR-118 runs in a west–east direction and is located approximately 850 feet southwest of the Project site. Balboa Boulevard is a north–south running arterial that is located approximately 0.5 mile west of the Project site. Neither of the County-designated emergency evacuation routes would be altered under the proposed Project. During Project implementation, the increased presence of construction equipment and constructed-related vehicles in the Project area may result in incremental traffic delays on these disaster routes. However, these delays would be temporary in nature and, with implementation of the Construction Worksite Control Plan required by SC-T-4, would not significantly impact the ability of residents to evacuate in the unlikely event of a major disaster event. Additionally, SC-PS-2 would ensure that emergency operations and procedures would be maintained during Project operation.

¹²⁷ City of Los Angeles Fire Department (Website). 2019. Fire Zone Map. Accessed, May 21, 2019. <https://www.lafd.org/fire-prevention/brush/fire-zone/fire-zone-map>.

¹²⁸ City of Los Angeles. 1996. Safety Element of the Los Angeles City General Plan. Accessed, May 17, 2019. <https://planning.lacity.org/cwd/gnlpln/saftyelt.pdf>.

¹²⁹ County of Los Angeles Chief Executive Office. 2012. County of Los Angeles Operational Area Emergency Response Plan. Accessed, May 17, 2019. <https://ceo.lacounty.gov/emergencydisaster-plans-and-annexes/>.

¹³⁰ County of Los Angeles Chief Executive Office. 2012. County of Los Angeles Operational Area Emergency Response Plan, Introduction. Accessed, May 17, 2019. <https://ceo.lacounty.gov/wp-content/uploads/OEM/OAERP/SECTION%201.%20%20INTRODUCTION.pdf>.

¹³¹ County of Los Angeles Department of Public Works. 2012. Disaster Routes Map for the City of Los Angeles- Valley Area. Accessed, May 17, 2019. <https://dpw.lacounty.gov/dsg/DisasterRoutes/map/Los%20Angeles%20Valley%20Area.pdf>.

4. Environmental Checklist and Analysis

Given the above, the proposed Project would have a less than significant impact on the County and City's adopted emergency response plans and emergency evacuation plans. No mitigation or further study is required.

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

No Impact. The proposed Project would not expose Project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. According to the General Plan's Safety Element, the Project site is not located within a designated wildfire hazard area and lies one mile southeast of the closest Very High Fire Hazard Severity Zone.¹³² The existing land uses that lie between the Project site and the VHFHSZ predominantly comprise urban development, the existence of which precludes the spread of wildland fire. Furthermore, the Project site is located in an area away from dense vegetation, and would be inspected by the State Fire Marshal, per SC-PS-1. Additionally, the proposed Project would adhere to the regulations outlined in the local fire code and Title 5 of the California Code of Regulations, which ensures that schools are designed to meet federal, state, and local statutory requirements for structure, fire, and public safety. Therefore, the proposed Project would not, due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and would not expose Project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. No impact would occur and no mitigation or further study is required.

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

No Impact. The proposed Project entails the improvement and modernization of the existing Kennedy High School Campus, including 23,530 square feet of demolition, 149,630 square feet of remodeling, and the construction of a single 20,581 square-foot building. The proposed Project would not require the installation of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment. Additionally, all improvements would be done in accordance with Title 5 of the California Code of Regulations, which ensures that schools are designed to meet federal, state, and local statutory requirements for structure, fire, and public safety. The proposed Project would not require the installation of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment. No impact would occur. No mitigation or further study is required.

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

No Impact. The proposed Project would not expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes. The Project site is generally flat and is located in a heavily urbanized area away from dense vegetation. As stated in Section X, Hydrology and Water Quality, the Project site is not at significant risk of inundation

¹³² City of Los Angeles Fire Department (Website). 2019. Fire Zone Map. Accessed, May 21, 2019. <https://www.lafd.org/fire-prevention/brush/fire-zone/fire-zone-map>.



4. Environmental Checklist and Analysis

due to flooding, and there would be no significant changes to on-site drainage as a result of Project implementation. As stated in Section VII, Geology and Soils, the Project site is not prone to landslides as a result of slope failure. Additionally, the Project would adhere to the regulations outlined in CCR Title 5, which ensures that schools are designed to meet federal, state, and local statutory requirements for structure, fire, and public safety. As such, the proposed Project would not expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes. No impact would occur. No mitigation or further study is required.

4. Environmental Checklist and Analysis

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

Explanation:

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

Less than Significant Impact. The proposed Project would result in less than significant impacts because the Project site is an existing high school campus located in an urbanized environment with minimal habitat and has been determined to not be eligible for historic significance (see Appendix A). Therefore, impacts would be less than significant, and no mitigation or further study is required.

- 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. The proposed Project is one of 22 school modernization projects evaluated in the SUP Program EIR. The SUP Program EIR identified potentially significant and unavoidable impacts regarding air quality, cultural resources, noise, and transportation. As stated throughout Section 4, the proposed Project would result in less than significant impacts in relation to environmental issue areas including air quality, cultural resources (with mitigation), noise, and transportation. As such, the proposed Project would not



4. Environmental Checklist and Analysis

contribute to a cumulatively considerable impact. Therefore, impacts would be less than significant. No mitigation or further analysis is required.

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

Less than Significant Impact. As described and analyzed throughout this document, the proposed Project would have a less than significant impact regarding factors that could directly or indirectly cause substantial adverse effects on human beings. Impacts would be less than significant. No mitigation or further study is required.

4. Environmental Checklist and Analysis

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5. List of Preparers

5.1 LEAD AGENCY

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5. List of Preparers

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