



February 2018 | Negative Declaration

JOHN H. FRANCIS POLYTECHNIC SENIOR HIGH SCHOOL COMPREHENSIVE MODERNIZATION

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NEGATIVE DECLARATION

Pursuant to the California Environmental Quality Act (CEQA) (California Public Resources Code (PRC) Sections 2100 et seq.) and the State CEQA Guidelines (California Code of Regulations (CCR) Sections 15000 et seq.), the Los Angeles School District has completed this Negative Declaration (ND) for the project described below based on the assessment presented in the attached Initial Study.

LEAD AGENCY: Los Angeles Unified School District

PROJECT TITLE: John H. Francis Polytechnic Senior High School Comprehensive Modernization

PROJECT LOCATION: The proposed Project site is at the John H. Francis Polytechnic Senior High School (Polytechnic HS) campus, located at 12431 Roscoe Boulevard, in the Sun Valley community, in the San Fernando Valley region of the City of Los Angeles.

PROJECT DESCRIPTION: The Los Angeles Unified School District (LAUSD or District) is proposing a comprehensive modernization of Polytechnic HS. The proposed Project would modernize Polytechnic HS to facilitate a safe and secure campus that better aligns with the current instructional program. The Project consists of the demolition of 11 permanent buildings and approximately 16 classrooms in portable buildings, construction of 41 classrooms in 6 permanent buildings, and additional site upgrades. The new buildings would include a gymnasium, administration & library buildings, auditorium & performing arts building, basketball & tennis courts, maintenance & operations building, food services building & lunch shelter, and two sanitary buildings.

The Polytechnic HS campus also includes relocatable buildings and infrastructure that are currently dedicated to other operations including: Robert H. Lewis Continuation High School and a Child Development Center. No changes to the facilities used by these programs are included as a part of the project.

There are approximately 319,328 square feet of building space on the campus. Following completion of the Project, the campus would have about 308,832 total square feet. The proposed Project would remove or demolish 39 existing classrooms and construct 41 new classrooms for an unchanged total of 103 classrooms. Campus modernizations at the high school would also include site upgrades and internal pedestrian circulation improvements, including:

- Sitewide infrastructure, including domestic water; irrigation; gas; sewer; fire, telephone, and data systems; electrical; storm drainage
- Sitewide upgrades to comply with Americans with Disabilities Act (ADA)
- Landscape, hardscape, and fencing
- Parking lots: new Roscoe parking, reconfigured Arleta parking and Wicks parking.

Interim housing for students during Project construction would be designed, installed, and constructed in accordance with the phasing plan that LAUSD project management team has approved. These temporary portable buildings would provide the necessary facilities to maintain a fully functional campus during all construction phases. A minimum of 200 parking spaces for faculty and staff and 25 spaces for visitors would be maintained onsite during construction.

EXISTING CONDITIONS: The proposed Project would occur on the Polytechnic HS campus which encompasses most of the 37.2-acre site at 12431 Roscoe Boulevard, City of Los Angeles. Student enrollment fluctuates at the high school; the school had approximately 2,806 students in grades 9 through 12 in the 2016–2017 school year. The campus has many buildings including an auditorium, administration, gymnasium, library, cafeteria, permanent and portable classroom buildings, along with maintenance and storage areas, athletic fields, and hardcourts. The school was built between 1956 and 1957.

DOCUMENT AVAILABILITY: The ND and supporting Initial Study for the John H. Francis Polytechnic Senior High School Comprehensive Modernization Project are available for review at the following locations:

- Los Angeles Unified School District, Office of Environmental Health and Safety, 333 South Beaudry Ave., 21st Floor, Los Angeles, CA 90017 (by appointment, call (213) 241-3199)
- John H. Francis Polytechnic High School Library, 12431 Roscoe Blvd., Sun Valley, CA 91352
- Sun Valley Branch Library: 7935 Vineland Avenue, Sun Valley, CA 91352
- LAUSD Local District Northeast Office, 8401 Arleta Avenue, Sun Valley, CA 91352
- LAUSD OEHS website: <http://achieve.lausd.net/ceqa>

SUMMARY OF IMPACTS: The attached Initial Study was prepared to identify the potential effects on the environment from the installation and operation of the modernized campus and to evaluate the significance of those effects. Based on the environmental analysis, the proposed Project would have no impacts or less-than-significant environmental impacts related to the following issues:

- | | | |
|----------------------------|--------------------------------------|---------------------------------|
| • Aesthetics | • Agriculture and Forestry Resources | • Air Quality |
| • Biological Resources | • Cultural Resources | • Geology and Soils |
| • Greenhouse Gas Emissions | • Hazards and Hazardous Materials | • Hydrology and Water Quality |
| • Land Use and Planning | • Mineral Resources | • Noise |
| • Pedestrian Safety | • Population and Housing | • Public Services |
| • Recreation | • Tribal Cultural Resources | • Transportation and Traffic |
| | | • Utilities and Service Systems |

Findings. It is hereby determined that, based on the information contained in the attached Initial Study, the proposed Project would not have a significant adverse effect on the environment.

February 2018 | Initial Study

**JOHN H. FRANCIS POLYTECHNIC
SENIOR HIGH SCHOOL
COMPREHENSIVE MODERNIZATION**

Table of Contents

Section	Page
1. INTRODUCTION.....	1
1.1 OVERVIEW.....	1
1.2 BACKGROUND.....	1
1.3 CALIFORNIA ENVIRONMENTAL QUALITY ACT.....	2
1.4 ENVIRONMENTAL PROCESS.....	2
1.5 IMPACT TERMINOLOGY.....	6
1.6 ORGANIZATION OF THE INITIAL STUDY.....	6
2. ENVIRONMENTAL SETTING.....	9
2.1 PROJECT LOCATION.....	9
2.2 SURROUNDING LAND USE.....	9
2.3 EXISTING CONDITIONS.....	10
2.4 GENERAL PLAN AND EXISTING ZONING.....	13
2.5 NECESSARY APPROVALS.....	15
3. PROJECT DESCRIPTION.....	31
3.1 PROPOSED PROJECT.....	31
3.2 CONSTRUCTION SCHEDULE.....	36
4. ENVIRONMENTAL CHECKLIST AND ANALYSIS.....	49
5. LIST OF PREPARERS.....	147
5.1 LEAD AGENCY.....	147
5.2 CEQA CONSULTANT.....	147

Table of Contents

APPENDICES

- A. Air Quality and Greenhouse Gas Emissions Background and Modeling Data
- B. Tree Health and Impact Assessment
- C-1. LAUSD Historic Resources Survey Report
- C-2. Preliminary Historic Resource Evaluation Report
- D. Report of Geotechnical Investigation
- E-1. Phase I Environmental Site Assessment
- E-2. Preliminary Environmental Assessment Equivalent
- F. Noise and Vibration Background and Modeling Data
- G. Traffic Impact Assessment
- H. Response to Comments

Table of Contents

List of Figures

Figure		Page
Figure 1	Regional Location	17
Figure 2	Local Vicinity	19
Figure 3	Aerial Photograph.....	21
Figure 4	Existing Campus Plan	23
Figure 5a	Site Photographs	25
Figure 5b	Site Photographs	27
Figure 6	Existing Vehicular Circulation	29
Figure 7	Building Removal.....	39
Figure 8	Campus Improvements.....	41
Figure 9	New Campus Circulation.....	43
Figure 10	Interim Housing Optional Locations	45
Figure 11	Approximate Construction Areas	47

List of Tables

Table		Page
Table 1	Existing Facilities	11
Table 2	Proposed Project (Demolition, Remodel, and Construction)	33
Table 3	Changes to Onsite Campus Parking.....	35
Table 4	Anticipated Construction Equipment	36
Table 5	Maximum Daily Regional Construction Emissions	60
Table 6	Maximum Daily Regional Construction Emissions—VOC Adjustment	61
Table 7	Localized Construction Emissions.....	63
Table 8	Construction BMPs	79
Table 9	Project-Related Construction GHG Emissions.....	84
Table 10	Typical Construction Equipment Vibration Levels	111
Table 11	Construction Equipment Vibration Damage Potential	113
Table 12	Maximum Heavy Equipment Noise Levels.....	116

Table of Contents

List of Tables

Table		Page
Table 13	Project-Related Construction Noise Levels.....	117
Table 14	Intersection Level of Service (LOS) Criteria	129
Table 15	Existing Intersection LOS	130
Table 16	Significance Criteria For Traffic Impacts.....	130
Table 17	Option 1 Traffic Conditions	133
Table 18	Option 3 Traffic Conditions	134

Abbreviations and Acronyms

AAQS	ambient air quality standards
AB	Assembly Bill
ACM	asbestos-containing material
ACCM	asbestos-containing construction material
ADT	average daily trips
AQMP	air quality management plan
BMP	best management practices
BOE	Board of Education (LAUSD)
CA FID UST	California Facility Inventory Database for Underground Storage Tanks
CalEEMod	California Emissions Estimator Model
CALGreen	California Green Building Standards Code
CARB	California Air Resources Board
CCR	California Code of Regulations
C&D	construction and demolition
CDE	California Department of Education
CEQA	California Environmental Quality Act
CFR	Code of Federal Regulations
CHMIRS	California Hazardous Material Incident Report System
CHPS	Collaborative for High Performance Schools
CMP	Los Angeles County Congestion Management Program
CO	carbon monoxide
CO ₂	carbon dioxide
CO _{2e}	carbon dioxide equivalent
dBa Leq	equivalent continuous sound level, in decibels
DPM	diesel particulate matter
DSA	Division of the State Architect (under the California Department of General Services)
ECHO	Enforcement and Compliance History Online
EDR	Environmental Data Resources
EIR	environmental impact report
EPA	US Environmental Protection Agency
ESA	Environmental Site Assessment
FETU	Facilities Environmental Technical Unit
FINDS	Facility Index System

Abbreviations and Acronyms

FTA	Federal Transit Administration
GHG	greenhouse gases
HVAC	heating, ventilation and air conditioning
IPCC	Intergovernmental Panel on Climate Change
LADOT	Los Angeles Department of Transportation
LAFD	City of Los Angeles Fire Department
LAMC	Los Angeles Municipal Code
LAUSD	Los Angeles Unified School District
LID	low-impact development
LST	localized significance thresholds
LUST	leaking underground storage tank
MBTA	Migratory Bird Treaty Act
MEP	Maximum Extent Practicable
Metro	Los Angeles County Metropolitan Transportation Authority
MPH	mile per hour
MTCO _{2e}	metric ton of CO _{2e}
MW	Materials and Waste Management
ND	negative declaration
NPDES	National Pollutant Discharge Elimination System
OEC	other environmental conditions
OEHHA	Office of Environmental Health Hazard Assessment
O ₃	ozone
PDF	project design features
PEA	Preliminary Environmental Assessment
PF	Public Facility
PM	particulate matter
PRC	Public Resources Code
PPV	peak particle velocity
RCRA-LQG	Resource Conservation and Recovery Act - Large Quantity Generators
REC	recognized environmental condition
RTP	Regional Transportation Plan
RWQCB	regional water quality control board
SB	Senate Bill

Abbreviations and Acronyms

SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SCS	sustainable communities strategy
SO ₂	sulfur dioxide
SoCAB	South Coast Air Basin
SRA	Source Receptor Area
SUP	School Upgrade Program
SUSMP	standard urban stormwater mitigation plan
SWEEPS UST	Statewide Environmental Evaluation and Planning System
SWPPP	stormwater pollution prevention plan
ULSD	ultra low sulfur diesel
UST	underground storage tank
VdB	vibration level
VOC	volatile organic compounds

Abbreviations and Acronyms

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1. Introduction

1.1 OVERVIEW

The Los Angeles Unified School District (LAUSD or District) is proposing a comprehensive modernization of John H. Francis Polytechnic Senior High School (Polytechnic HS; Project), at 12431 Roscoe Boulevard, Sun Valley, in the San Fernando Valley region of the City of Los Angeles. Comprehensive modernization projects are designed to address the most critical physical needs of the building and grounds at the campus through building replacement, renovations, modernizations, and reconfiguration. The proposed Polytechnic HS 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 Project.

1.2 BACKGROUND

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

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

On March 10, 2015, the BOE approved pre-design and due diligence activities necessary to develop a project definition for the Polytechnic HS project.⁵ On April 12, 2016, the BOE approved the project definition for the Polytechnic HS Comprehensive Modernization. The Project is designed to address the most critical

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

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

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

⁴ LAUSD Regular Meeting Stamped Order Of Business. 333 South Beaudry Avenue, Board Room, 1 p.m., Tuesday, November 10, 2015 (Board of Education Report No. 159 – 15/16).

⁵ LAUSD Board of Education Report. March 10, 2015. Report Number 373 – 14/15. Subject: Identification of 11 School Sites for the Development of Comprehensive Modernization Projects.

1. Introduction

physical concerns of the building and grounds at the campus while upgrading, renovating, modernizing, and reconfiguring the campus to provide facilities that are safe, secure, and better aligned with the current instructional program.⁶

1.3 CALIFORNIA ENVIRONMENTAL QUALITY ACT

The environmental compliance process is governed by CEQA⁷ and the State CEQA Guidelines.⁸ CEQA was enacted in 1970 by the California Legislature to disclose to decision makers and the public the significant environmental effects of projects and to identify ways to avoid or reduce the environmental effects through feasible alternatives or mitigation measures. Compliance with CEQA applies to California government agencies at all levels: local, regional, and state agencies, boards, commissions, and special districts (such as school districts and water districts).

LAUSD is the lead agency for this Project and is therefore required to conduct an environmental review to analyze the potential environmental effects associated with the 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 Project would result in environmental impacts. An initial study is a preliminary environmental analysis to determine whether an EIR, a mitigated negative declaration (MND), or a negative declaration (ND) is required for a project.⁹

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

1.4 ENVIRONMENTAL PROCESS

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

- 1) An activity directly undertaken by any public agency including but not limited to public works construction and related activities clearing or grading of land, improvements to existing public structures,

⁶ LAUSD Board of Education Report. December 8, 2015. April 12, 2016. Report Number 340-15/16. Subject: Approval of Project Definitions for Three Comprehensive Modernization Projects and Authorization to Add Classroom Interior Improvement Scope to Current 11 Projects..

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

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

⁹ 14 CCR Section 15063.

¹⁰ 14 CCR Section 15064.

¹¹ 14 CCR Section 15070.

1. Introduction

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])

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 Negative Declaration and Supporting Initial Study

This Initial Study was prepared to determine if the Project would have a significant impact on the environment. The purpose of the Initial Study is to 1) provide the lead agency with information to use as the basis for deciding the proper type of CEQA document to prepare; 2) enable the lead agency to modify a project, mitigating adverse impacts before an EIR is prepared, thereby enabling the project to qualify for a negative declaration; 3) assist in the preparation of an EIR, if one is required; 4) facilitate environmental assessment early in the design of a project; (5) provide documentation of the factual basis for the findings in an MND or ND; (6) eliminate unnecessary EIRs; and (7) determine if the project is covered under a previously prepared EIR.¹² An ND is the appropriate CEQA document for this Project because environmental impacts were not found to be significant.

1.4.2 Tiering

The Polytechnic HS Comprehensive Modernization project is one of many types of projects that were analyzed in the SUPProgram EIR, certified by the LAUSD BOE on November 10, 2015.¹³ LAUSD’s SUP Program EIR meets the criteria of a Program EIR under CEQA Guidelines Section 15168 (a)(4) as one “prepared on a series of actions that can be characterized as one large project and are related...[a]s individual activities carried out under the same authorizing statutory or regulatory authority and having generally similar environmental effects which can be mitigated in similar ways.”

The Program EIR enables LAUSD to streamline future environmental compliance and reduce the need for repetitive environmental studies. It serves as the framework and baseline for CEQA analyses of later projects through a process known as “tiering.” Under CEQA Guidelines Sections 15152(a) and 15385, “tiering” refers to using the analysis of general matters from a broad EIR (such as one prepared for a program) and applying it to later EIRs and negative declarations on narrower projects, incorporating by reference the general

¹² 14 CCR Section 15063.

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

1. Introduction

discussion from the broad EIR and concentrating the later EIR or negative declaration solely on the issues specific to that project.

The SUP Program EIR grouped potential projects into four categories based on project scope, type of construction, and location of projects. This project falls under the categories of Type 2, “New Construction on Existing Campus,”¹⁴ and Type 3, “Modernization, Repair, Replacement, Upgrade, Remodel, Renovation and Installation.”

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

1.4.3 Project Plans and Building Design

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

Collaborative for High Performance Schools. The Project would include CHPS criteria points under seven categories: Integration, Indoor Environmental Quality, Energy, Water, Site, Materials and Waste Management, and Operations and Metrics. Under the current 2014 CA-CHPS criteria, the project would earn at least 250 points—110 prerequisite criteria points and 140 criteria credit points. The optional credit points would be determined during later site and architectural design phases, but all prerequisites are required.

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

¹⁴ Type 2: Demolition and new building construction on existing campus (replace school building on same location); Installation of temporary structures. Type 3: Outdoor repair, modernization, replacement or upgrade of athletic fields, play equipment, fencing, parking, replace shade shelter, asphalt/concrete paths, driveways, ADA compliance, seismic retrofits; Repair and replacement of building systems such as flooring, windows, and roofing; Interior and exterior installation, repair, replacement and maintenance.

¹⁵ CALGreen. California Green Building Standards Code, Title 24, Part 11, of the California Code of Regulations.

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.

1. Introduction

Standard Conditions of Approval. LAUSD Standard Conditions of Approval (SC) are uniformly applied development standards and were adopted by the LAUSD BOE in November 2015.¹⁷ The SCs were compiled from established LAUSD standards, guidelines, specifications, practices, plans, policies, and programs, as well as typically applied mitigation measures. The SCs are divided into the 19 LAUSD CEQA environmental topics (Appendix G of the CEQA Guidelines plus Pedestrian Safety).¹⁸ For each SC, compliance is triggered by factors such as the project type, existing conditions, and type of environmental impact. Compliance with every condition is not required. The SCs have been updated since the original Board of Education (BOE)-adopted 2015 version in order to incorporate and reflect changes in recent laws; regulations; and LAUSD's standard policies, practices, and specifications.

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 be project specific and must further reduce significant environmental impacts by requiring measures that exceed compliance with federal, state, and local laws and regulations; PDFs; LAUSD SCs, and CHPS.

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 LAUSD SCs are considered part of the Project and are included in the environmental analysis.

¹⁷ LAUSD. 2015. Program EIR for the School Upgrade Program. Available at: <http://achieve.lausd.net/ceqa>. (see Table 4-1 and Appendix F of the Program EIR).

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

¹⁹ Collaborative for High Performance Schools (CHPS) criteria are summarized. The full list of criteria can be found at <http://www.chps.net/dev/Drupal/California>.

1. Introduction

1.5 IMPACT TERMINOLOGY

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

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

1.6 ORGANIZATION OF THE INITIAL STUDY

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

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

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

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

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

Chapter 5, *List of Preparers*, identifies the individuals who prepared this Initial Study and technical studies.

1. Introduction

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

- A. Air Quality and Greenhouse Gas Emissions Background and Modeling Data
- B. Tree Health and Impact Assessment
- C-1. LAUSD Historic Resources Survey Report
- C-2. Preliminary Historic Resource Evaluation Report
- D. Report of Geotechnical Investigation
- E-1. Phase I Environmental Site Assessment
- E-2. Preliminary Environmental Assessment Equivalent
- F. Noise and Vibration Background and Modeling Data
- G. Traffic Modeling Worksheets
- H. Response to Comments

1. Introduction

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2. Environmental Setting

2.1 PROJECT LOCATION

The 37.2-acre John H. Francis Polytechnic Senior High School (Polytechnic HS or Project), is located at 12431 Roscoe Boulevard, City of Los Angeles (Sun Valley Community in the San Fernando Valley) (Assessor's Parcel Numbers [APNs] 2634-019-900). The school is on the northeast corner of the Roscoe Boulevard and Arleta Avenue intersection. Regional access to the school is from the Hollywood Freeway (SR-170) to Roscoe Boulevard east (see Figure 1, Regional Location). The school campus elevation is 828 feet above mean sea level, and the site and surrounding vicinity is relatively flat.²⁰

2.2 SURROUNDING LAND USE

The Polytechnic HS campus is in an urbanized area surrounded by residential, commercial, and school uses (see Figure 2, *Local Vicinity*, and Figure 3, *Aerial Photograph*). The school is bordered by the following land uses:

- Northwest: 41-acre Wicks Street and Sheldon Arleta Park (also referred to by the City of Los Angeles as Cesar Chavez Recreation Complex).²¹ Park construction began in April 2007. The park is partially constructed and when complete will include soccer fields, baseball and softball fields, basketball courts, a community center and paths for walking or jogging.²² The park sits on top of the former Sheldon-Arleta Landfill at 12455 Wicks Street, (Sun Valley) Los Angeles, CA 91352. The 41-acre landfill (property size: 50 acres) was opened in 1962 and closed in 1975 and was covered with dirt and a system for landfill gas monitoring was installed.²³
- Northeast: Sharp Avenue and single-family residential.
- Southeast: Peoria Street and single-family residential.
- South: Roscoe Boulevard and commercial retail (Cars 4U used car lot, Mobil gas station, Perry Mexican food restaurant (former gas station), and single-family residential.

²⁰ Amec Foster Wheeler. November 7, 2016. Report of Geotechnical Investigation Proposed School Modernization. Francis Polytechnic Senior High School. 12431 Roscoe Boulevard, Sun Valley, California. Project 4953-16-1011.

²¹ City of Los Angeles zoning. <http://zimas.lacity.org/>

²² Los Angeles Daily News. <http://www.dailynews.com/article/zz/20070413/NEWS/704139849>

²³ City of Los Angeles. LA Sanitation. Sheldon-Arleta (Cesar Chavez Recreational Complex). FACT SHEET https://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-s/s-lsh-wwd-s-cl/s-lsh-wwd-s-cl-sal;jsessionid=GFJp4uZKA7ehW8KLiP2fE-ODsnZsldmeYWHbhLPvHaeGvZapNH8sl-50547511!-1311454547?_afrLoop=5955283011598874&_afrWindowMode=0&_afrWindowId=null#!%40%40%3F_afrWindowId%3Dnull%26_afrLoop%3D5955283011598874%26_afrWindowMode%3D0%26_adf.ctrl-state%3Dben8hkev_w_4

2. Environmental Setting

- Southwest: Arleta Avenue and schools (Byrd Middle School, Polytechnic Freshman Academy, and North Hollywood Polytechnic Community Adult School).

The Golden State Freeway (Interstate 5 [I-5]) is about 0.4 miles north; the Hollywood Freeway (SR-170) is about 1,100 feet west at the closest point. The concrete-lined Tujunga Wash, a Los Angeles County flood control channel that originates at the Hansen Dam spillway 4.5 miles northeast, is approximately 0.6 miles north of the school, where it runs under the I-5/SR-170 interchange.

2.3 EXISTING CONDITIONS

The Project would occur on and within the spaces that are exclusively the Polytechnic HS campus. Student enrollment fluctuates; currently the school has approximately 2,806 students in grades 9 through 12 (2016–2017). The campus has many buildings including an auditorium, administration, gymnasium, library, cafeteria, permanent and portable classroom buildings, along with maintenance and storage areas, athletic fields, and hardcourts. The school was built between 1956 and 1957.

Academic Buildings: The main axis of the campus is defined by two 1956 buildings; the administration building, and the library / study hall. These buildings are one story and of masonry / concrete construction. The central quad, also called “polygon,” is well used as a gathering place, for central pedestrian circulation, and as the overflow area during lunch. Surrounding the quad are the classroom building wings, mostly built in 1956 and 1957; all are of wood frame construction. Also located at the quad is the 1956 cafeteria building that has masonry / concrete construction. Adjacent to the cafeteria building is the wood frame utility building.

Performing Arts: The performing arts facilities are across from the administration building at the south end of the campus. The auditorium building was built in 1959 of reinforced concrete and contains a sloped seating area with a full stage and support facilities. Adjacent to the auditorium building is a single-story music building built in 1956 of wood frame construction.

Athletics: The athletic facilities include two gymnasiums: the practice gym north of the cafeteria building and the competitive gym on the west side of the campus. Both facilities have weight/fitness rooms, locker rooms, and a medium-size gymnasium.

The outdoor facilities consist of:

- A football field surrounded by a running track at the north end of the campus. Bleachers are on both sides of the field.
- A baseball field at the west end of the campus.
- A softball field at the east end of the campus.
- Tennis courts in the center of the campus.
- Basketball courts at the west and east ends of the campus.

2. Environmental Setting

Portable Classrooms: Some portable classrooms were installed in the 1950's and 1960's, but the majority of the portable classrooms were installed in the late 1990's and in 2000. There are currently 46 classrooms in portable buildings.

The high school campus also shares space with the Robert H. Lewis Continuation High School and a Child Development Center (CDC). The scope of the proposed Project is limited to the Polytechnic High School campus proper and does not include either of these shared school sites.

Robert H. Lewis Continuation High School: This continuation school occupies the northern portion of the Polytechnic HS campus, adjacent to the football field. The continuation school was moved to this location in 2004. The continuation school has four portable buildings, including an administration building, two classroom buildings, and a sanitary building; a basketball half-court and tennis court, and a 91-space parking lot. There are two driveways for the parking lot: one on Wicks Street and one on Sharp Avenue.

Child Development Center: The CDC is on the east side of the Polytechnic HS campus, and operates from a 1,440-square-foot portable building. There is also a tot lot, outdoor lunch area, blacktop play yard, and 15-space parking lot.

2.3.1 Existing Facilities

Table 1 and Figure 4, *Existing Campus Plan*, show existing campus facilities as documented in 2016. Figures 5a and 5b, *Site Photographs*, shows the existing conditions on the campus.

Table 1 Existing Facilities

Building ID	Building Number	Building Name	Building Square Footage	Building Type	Year Built
A16326	1	Auditorium Building	21,573	permanent	1959
A12575	2	Music Building	5,248	permanent	1956
N/A	3	Storage Unit 1	116	permanent	1956
A12575	4	Shop Bldg. 2	13,732	permanent	1956
A14460	5	Shop Bldg. 1	12,072	permanent	1957
A14460	6	Business Education Building	9,753	permanent	1957
A14460	7	Art & Crafts Building	9,110	permanent	1956
A12575	8	Homemaking Building	8,619	permanent	1956
A12575	9	Administrative Building	18,927	permanent	1956
A14460	10	Library & Study Hall Building	11,620	permanent	1957
A14460	11	Transformer Vault	133	permanent	1957
A14460	12	Driver Education Building	4,542	permanent	1957
A14460	13	Classroom Building	3,001	permanent	1957
A21099	14	Two/Three Unit Relocatable	2,688	portable	1961
A22093	15	Two/Three Unit Relocatable	2,304	portable	1962
A14460	16	Sanitary Building	880	permanent	1957
A14460	17	Sanitary Building	880	permanent	1957
A12575	18	Sanitary Building	881	permanent	1956

2. Environmental Setting

Table 1 Existing Facilities

Building ID	Building Number	Building Name	Building Square Footage	Building Type	Year Built
A12575	19	Sanitary Building	880	permanent	1956
A12575	20	Sanitary Building	880	permanent	1956
A14460	21	Sanitary Building	881	permanent	1957
A12575	22	Student Store Building	1,322	permanent	1956
A12575	23	Cafeteria Building	29,347	permanent	1956
A12575	24	Utility Building	6,375	permanent	1956
A12575	25	Classroom Bldg. F	9,408	permanent	1956
A12575	26	Classroom Bldg. H	9,441	permanent	1956
A14460	27	Classroom Bldg. K	9,624	permanent	1957
A12575	28	Classroom Bldg. G	6,708	permanent	1957
A14460	29	Classroom Bldg. J	6,708	permanent	1957
A14460	30	Classroom Bldg. L	6,870	permanent	1957
A12575	31	Math & Science Bldg. M	27,404	permanent	1956
A22093	32	Two/Three Unit Relocatable	2,668	portable	1962
A22093	33	Two/Three Unit Relocatable	2,946	portable	1962
N/A	37	Storage Unit 3	176	permanent	1969
A29134	39	Classroom Bldg. N	9,708	permanent	1968
A12575	40	Agricultural Building	1,873	permanent	1956
A14460	41	Lath House (Former R0031n)	1,344	permanent	1957
A14460	42	Greenhouse 1	174	permanent	1957
N/A	43	Storage Unit Relocatable	160	portable	1910
A13586	45	Girl's Gymnasium Building	18,117	permanent	1972
A13586	46	Boys Gymnasium Building	31,294	permanent	1957
A14460	49	Ticket Booth Relocatable	43	permanent	1957
A14460	50	Sanitary Building	1,125	portable	1957
A14460	55	Sanitary Building	849	permanent	1957
N/A	56	Storage Unit 4	360	permanent	1957
N/A	57	Concessions Bldg.	804	permanent	1957
N/A	64	Single Unit Modular	960	permanent	1957
N/A	65	Single Unit Modular	960	portable	1957
N/A	66	Single Unit Modular	960	permanent	1957
N/A	67	Single Unit Modular	960	permanent	1974
N/A	80	Single Unit Modular (classroom)	960	permanent	1955
N/A	81	Single Unit Modular (classroom)	960	permanent	2005
Total Polytechnic High School building square footage			319,328	—	—

Note: Square footages based on Space Program Exhibit D.1.

2. Environmental Setting

2.3.2 Site Access and Circulation

As shown in Figure 3, the main entrance to the campus is along Arleta Avenue just north of the Roscoe Boulevard intersection. Designated student drop-off and pick-up areas are along Arleta Avenue and Wicks Street; however observed drop-off and pick-up takes place along all surrounding streets as shown on Figure 6, *Existing Vehicular Circulation*. There are crosswalks at all surrounding intersections and traffic signals at Roscoe Boulevard/Arleta Avenue, Wicks Street/Arleta Avenue, and Roscoe Boulevard/Peoria Street intersections.

2.3.3 Parking

The high school has 439 parking spaces in seven separate on-campus parking lots ranging from 15 to 142 spaces.²⁴ Curbside parking is not permitted along the surrounding streets. There are two driveways for parking lots along Arleta Avenue, two along Wicks Street, and two along Peoria Street.

2.3.4 Operation

School Operations. Polytechnic HS is a two-semester, single-track school that serves 9th through 12th grades. Students attend classes from August through June. The 9th grade students attend classes in the Polytechnic Freshman Academy, which is located across Arleta Avenue from the Polytechnic HS main campus. The 10th – 12th grade students attend classes in the Polytechnic main campus. The scope of the proposed Project is limited to the Polytechnic main campus. School hours are 8:05 AM to 3:00 PM.

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

Community Use. In compliance with the Civic Center Act, (CA Education Code Sections 38130-38139), the campus is available for community use at selected times when not in use by LAUSD.²⁵

2.4 GENERAL PLAN AND EXISTING ZONING

The City of Los Angeles General Plan Land Use designation for the school property is 'Public Facilities'.²⁶ The land use element of the General Plan is comprised of 35 community plans; they are the official guide to the future development of the City of Los Angeles. The school campus is within the Sun Valley - La Tuna Canyon Community Plan Area.²⁷

²⁴ Parking space total does not include 91 spaces at Lewis Continuation High School or 15 spaces at the Child Development Center.

²⁵ California Education Code Sections 38130–38139.

²⁶ City of Los Angeles zoning. <http://zimas.lacity.org/>

²⁷ City of Los Angeles, Department of City Planning. General Plan. General Community Plans. <http://cityplanning.lacity.org/>

2. Environmental Setting

The zoning for the school property is [Q]PF-1XL. PF (Public Facilities), the designation for the use and development of publicly owned land, including public elementary and secondary schools. [Q] means additional restrictions on building design, landscape buffer, signs, etc.; '1' is Height District No. 1; and 'XL' is Extra Limited Height District where no building or structure shall exceed two stories, nor shall the highest point of the roof of any building or structure exceed 30 feet in height.²⁸

Other land use designations for this property include:²⁹

- EZs are specific geographic areas designated by City Council resolution, and have received approval from the California Department of Commerce under either the Enterprise Zone Act Program or Employment And Economic Incentive Act Program. The Federal, State and City governments provide economic incentives to stimulate local investment and employment through tax and regulation relief and improvement of public services. This designation does not apply to the existing high school campus.
- ZI-2427 Freeway Adjacent Advisory Notice for Sensitive Uses. In the City of Los Angeles, sites within 1,000 feet of freeways are in an area where a "Freeway Adjacent Advisory Notice" is distributed to all applicants for new projects and expansions of existing development involving sensitive uses, particularly schools and residential uses. The distance to the Roscoe Boulevard off ramps is about 1,000 feet; the closest point between the school and the freeway is about 1,100 feet.
- The school campus is also within the Sun Valley Neighborhood Council District.³⁰

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, it is anticipated that LAUSD would comply with Government Code Section 53094 to render the local City of Los Angeles Zoning Ordinance inapplicable to the proposed Project. Following a two-thirds vote of the LAUSD Board, LAUSD can exempt a school site from such local zoning requirements. Within 10 days of the action, the Board must provide the City of Los Angeles with notice of this action.

²⁸ City of Los Angeles Municipal Code, Section 12.21.1. Height of Building or Structures.
[http://library.amlegal.com/nxt/gateway.dll/California/lapz/municipalcodechapterplanningandzoningco/chaptergeneralprovisio nsandzoning/article2specificplanning-zoningcomprehen/sec12176m1limitedindustrialzone?f=templates\\$fn=default.htm\\$3.0\\$vid=amlegal:lapz_ca\\$anc](http://library.amlegal.com/nxt/gateway.dll/California/lapz/municipalcodechapterplanningandzoningco/chaptergeneralprovisio nsandzoning/article2specificplanning-zoningcomprehen/sec12176m1limitedindustrialzone?f=templates$fn=default.htm$3.0$vid=amlegal:lapz_ca$anc).

²⁹ City of Los Angeles zoning <http://zimas.lacity.org/>

³⁰ City of Los Angeles, Department of City Planning. Parcel Profile Report for 18605 Erwin Street in Reseda (APN 2127-012-900). [zimas.lacity.org | planning.lacity.org](http://zimas.lacity.org/planning.lacity.org).

2. Environmental Setting

2.5 NECESSARY APPROVALS

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

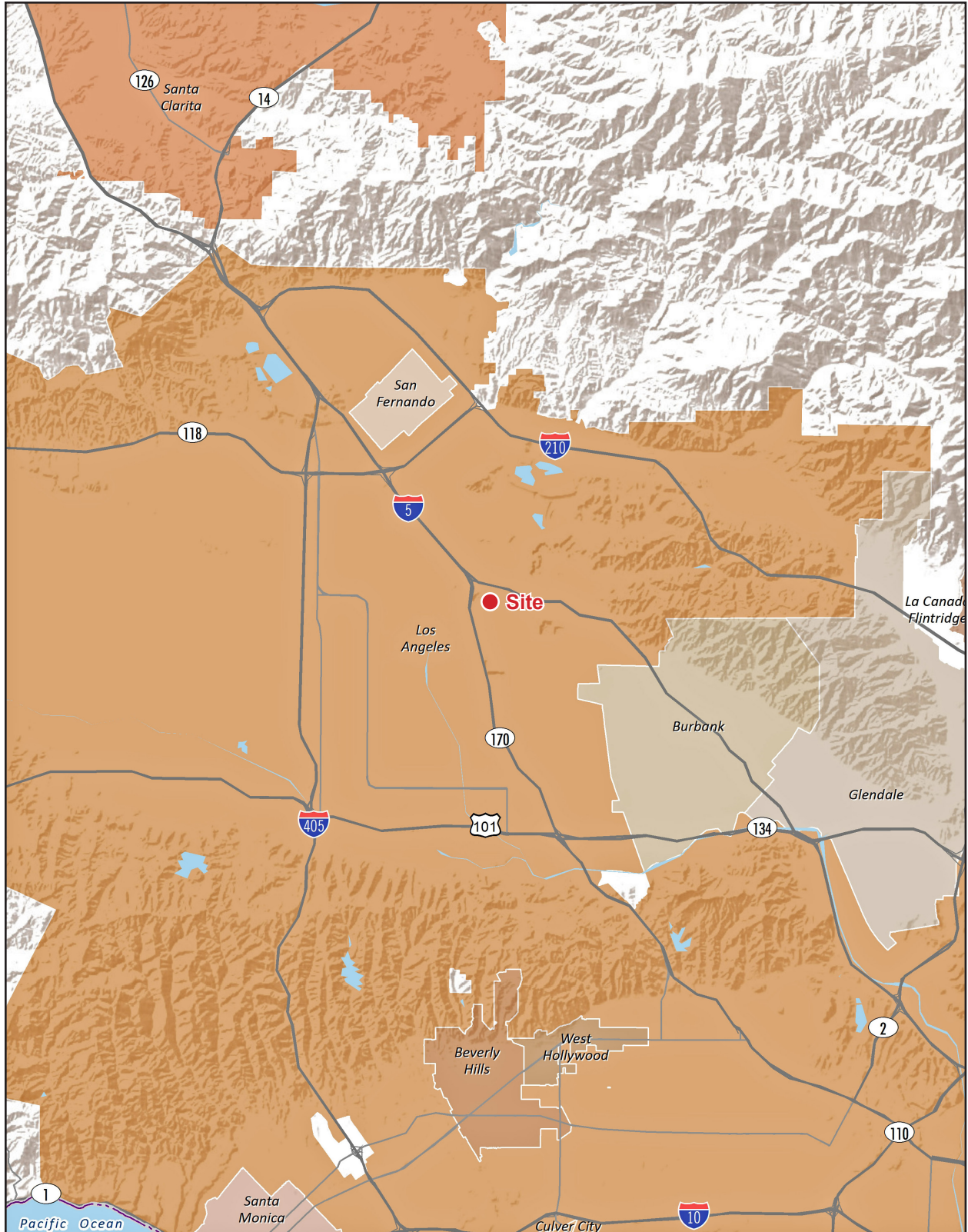
- **City of Los Angeles, Public Works Department.** Permit for curb, gutter, and other offsite improvements
- **City of Los Angeles, Fire Department.** Approval of plans for emergency access and emergency evacuation. DSA approval of the fire/life safety portion of a Project requires local fire authority (LFA) review of: elevator/stair access for emergency rescue and patient transport; access roads, fire lane markings, pavers, and gate entrances; fire hydrant location and distribution; and fire flow (location of post indicator valve, fire department connection, and detector check valve assembly).
- **City of Los Angeles, Department of Transportation.** Approval of haul route.
- **California Department of General Services, Division of State Architect (DSA).** Plan review and construction oversight, including structural safety, fire and life safety, and access compliance.
- **California Department of Education, School Facilities Planning Division (CDE).** If LAUSD is requesting modernization funds from the State Allocation Board (SAB) they must have the plans reviewed and approved by the CDE (Education Code Section 17070.50) prior to submitting a funding request. Approval of design for educational appropriateness.
- **California Department of Transportation (Caltrans).** Transportation permit for oversized vehicles on State highways.
- **State Water Resources Control Board (SWRCB).** Review of Notice of Intent (NOI) to obtain permit coverage; issuance of general permit for discharges of stormwater associated with construction activity; review of Storm Water Pollution Prevention Plan (SWPPP).
- **Los Angeles Regional Water Quality Control Board (LARWQCB).** Issue National Pollution Discharge Elimination System (NPDES) permit; Clean Water Act Section 401 Water Quality Certification.
- **South Coast Air Quality Management District.** Review and file submittals for Rule 403, Fugitive Dust; Rule 1403, Asbestos Emissions from Demolition/Renovation Activities; Rule 201, Permit to Construct; Rule 1166, Volatile Organic Compound Emissions from Decontamination of Soil, and site-specific soil mitigation plan; and site monitoring.

2. Environmental Setting

Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code Section 21080.3.1? No Native American Tribes have requested notification or consultation through the PRC Section 21080.3.1 process.

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

Figure 1 - Regional Location
2. Environmental Setting



Note: Unincorporated county areas are shown in white.



Source: ESRI, 2017

2. Environmental Setting

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Figure 2 - Local Vicinity
2. Environmental Setting



 School Boundary

0 2,000
Scale (Feet)



Source: ESRI, 2017

2. Environmental Setting

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Figure 3 - Aerial Photograph
2. Environmental Setting



— School Boundary

0 400
Scale (Feet)

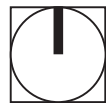
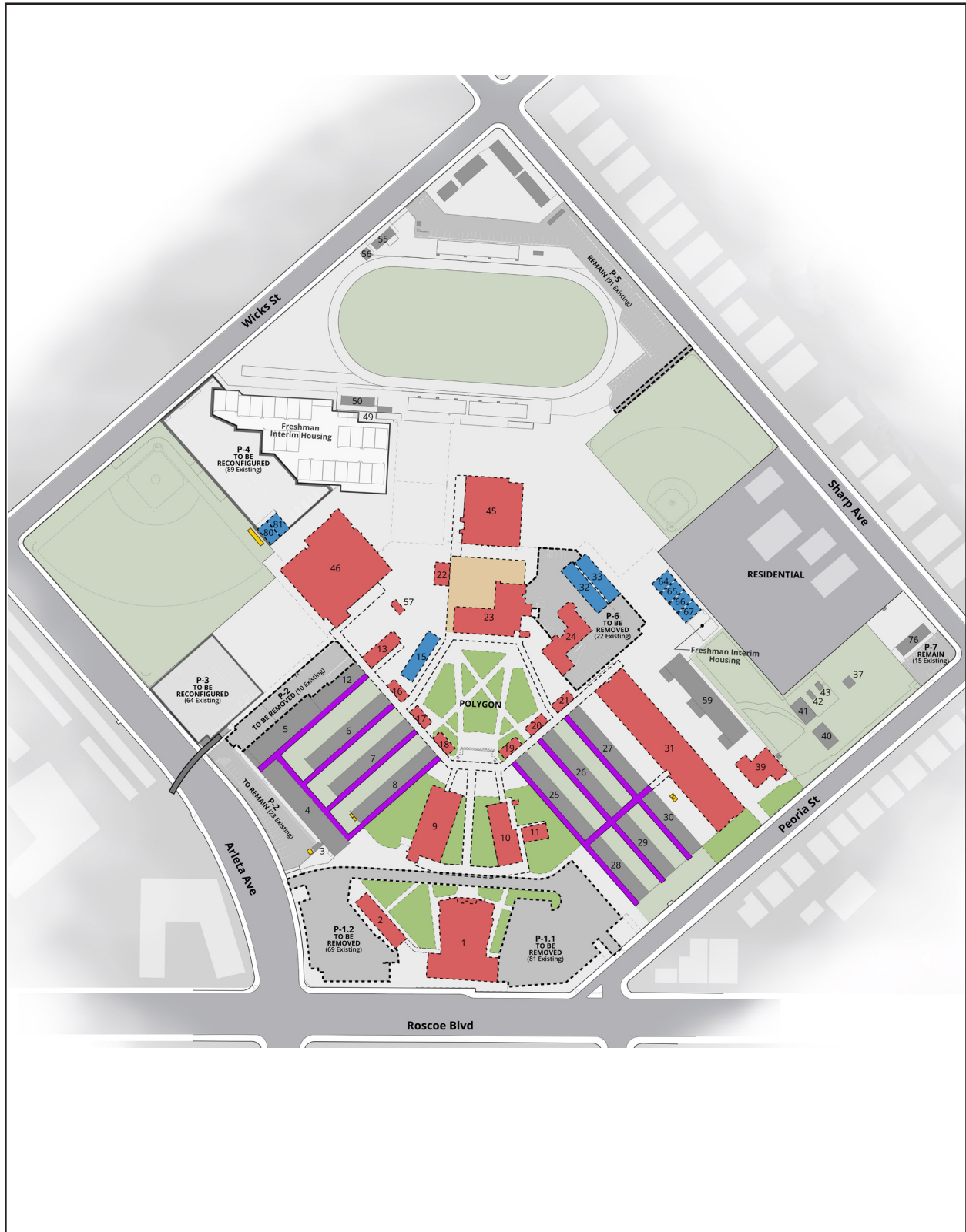


Source: Google Earth Pro, 2017

2. Environmental Setting

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Figure 4 - Existing Campus Plan
2. Environmental Setting



2. Environmental Setting

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Figure 5a - Site Photographs
2. Environmental Setting



Photo 1. View of the central “polygon” looking west toward Building 57 (Concessions Building).



Photo 2. View of Building 46 (Boy's Gymnasium) from Building 23 (Cafeteria).



Photo 3. View of Building 23 (Cafeteria) looking north from the polygon.



Photo 4. View of Building 1 (Auditorium) entrance looking south.



Photo 5. View of covered arcade between buildings.



Photo 6. View of tennis courts looking north from Building 45 (Girl's Gymnasium).

2. Environmental Setting

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Figure 5b - Site Photographs
2. Environmental Setting



Photo 7. View of Building 45 (Girls' Gymnasium) and bleachers looking northwest.



Photo 8. View of the "polygon" looking north from Buildings 9 (Administration) and 10 (Library).



Photo 9. View of outdoor dining area adjacent to Building 23 (Cafeteria).



Photo 10. View of Parking P-1.1 looking west toward Buildings 1 (Auditorium) and 10 (Library).



Photo 11. View of tennis courts looking north from Building 45 (Girl's Gymnasium).






Photo 12. View of Building 32 (portable classrooms) looking north from Building 24 (Utility Building).

2. Environmental Setting

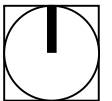
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Figure 6 - Existing Vehicular Circulation
2. Environmental Setting



 Vehicular Access Point  Designated Passenger Loading Zone  Observed Drop-offs/Pick-ups

0 400
Scale (Feet)



Source: Fehr & Peers, 2017

2. Environmental Setting

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3. Project Description

3.1 PROPOSED PROJECT

The proposed comprehensive modernization project would occur on the Polytechnic HS campus, which encompasses most of the 37.2-acre site at 12431 Roscoe Boulevard, City of Los Angeles.

3.1.1 Campus Improvements

The Project would modernize Polytechnic HS to facilitate a safe and secure campus that better aligns with the current instructional program. The Project consists of the demolition of 11 permanent buildings and approximately 16 classrooms in portable buildings, construction of 41 classrooms in 6 permanent buildings, and additional site upgrades. No subterranean construction would occur; the lowest finished floor elevations of new buildings would be about same as the existing buildings. The new buildings would be one- and two-stories tall.

The Polytechnic HS campus includes relocatable buildings that are currently dedicated to other operations including: Robert H. Lewis Continuation High School and a Child Development Center. No changes to the relocatable buildings used by these programs are included as a part of the Project.

Specifically, the Project would include the following changes to the campus, as shown in Table 2, Figure 7, *Building Removal*, and Figure 8, *Campus Improvements*. Additionally, Figure 9, *New Campus Circulation*, shows the proposed locations of pedestrian routes and vehicular service roads.

■ Demolition and Removal

- Approximately 16 classrooms located in eight portable buildings
- Administration Building
- Boys' Gymnasium
- Girls' Gymnasium
- Cafeteria & 2 Lunch Shelters
- Music Building
- Auditorium Building
- Library & Study Hall Building
- Math & Science Building
- Student Store & Concessions Buildings
- Utility Building
- Six Sanitary Buildings
- Transformer Vault
- Classroom building #13

3. Project Description

■ Remodel

- Classroom buildings #4-8, 12, 25-30: new paint and roof
- Classroom buildings #49, 50, 55, 56, and 59: new paint

■ New Construction

- Approximately 41 classrooms and support spaces in Science & General Classroom Building
- Gymnasium
- Auditorium & Performing Arts Building
- Food Services Building & Lunch Shelter
- Maintenance & Operations Building
- Administration & Library Buildings
- Two Sanitary Buildings
- Basketball courts and tennis courts

■ Site Upgrades

- Sitewide infrastructure, including domestic water; irrigation; gas; sewer; fire, telephone, and data systems; electrical; storm drainage
- Sitewide upgrades to comply with Americans with Disabilities Act (ADA)
- Landscape, hardscape, and fencing
- Parking lots: new Roscoe parking, reconfigured Arleta parking and Wicks parking.

■ Potential Circulation Improvements

- Arleta Avenue: Convert Arleta Avenue driveway for main school parking lot from all-way turns to right in /right out only. Alternatively, access to this driveway may remain all-way turns.
- Wickes Street /Arleta Avenue: Reconstruct the curb ramp at the southeast corner of the intersection to meet current ADA standards.
- Prohibit northbound left-turns into the Polytechnic High School entrance on Peoria Street. Install a concrete island inside the driveway that would deter vehicles from turning left into the Polytechnic High School entrance on Peoria Street. The island would be designed as a “pork chop” which would channelize rights out and rights in, but would make it difficult for vehicles to make a northbound left turn into the driveway. This option would require widening the driveway. Alternatively, the driveway on Peoria Street may be removed or access to the driveway may remain all-way turns.
- Relocate pedestrian access point on Peoria Street: Relocate the pedestrian access point on Peoria Street further south, closer to Roscoe Boulevard to make the use of the crosswalk across Peoria Street the most direct pedestrian path of travel.

3. Project Description

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

Bldg. ID*	Bldg. No.	Building Name	Demolition/ Removal (sf)	Remodel (sf)	New Construction (sf)	Existing to Remain (sf)	Total (sf)
A16326	1	Auditorium Building	21,573	—	—	—	—
A12575	2	Music Building	5,248	—	—	—	—
N/A	B	Auditorium / Performing Arts	—	—	26,801	—	26,801
N/A	3	Storage Unit 1	—	—	—	116	116
A12575	4	Shop Bldg. 2	—	—	—	13,732	13,732
A14460	5	Shop Bldg. 1	—	—	—	12,072	12,072
A14460	6	Business Education Building	—	9,753	—	—	9,753
A14460	7	Art & Crafts Building	—	9,110	—	—	9,110
A12575	8	Homemaking Building	—	8,619	—	—	8,619
A12575	9	Administrative Building	18,927	—	—	—	—
N/A	A	Administration / Classrooms	—	—	71,036	—	71,036
A14460	10	Library & Study Hall Building	11,620	—	—	—	—
N/A	E	Library/Satellite Administration Center / College Center	—	—	13,900	—	13,900
A14460	11	Transformer Vault	133	—	—	—	—
A14460	12	Driver Education Building	—	—	—	4,542	4,542
A21099	14	Two/Three Unit Relocatable	2,688	—	—	—	—
A14460	13	Classroom Building	3,001	—	—	—	—
A22093	15	Two/Three Unit Relocatable	2,304	—	—	—	—
A14460	16	Sanitary Building	880	—	—	—	—
A14460	17	Sanitary Building	880	—	—	—	—
A12575	18	Sanitary Building	881	—	—	—	—
A12575	19	Sanitary Building	880	—	—	—	—
A12575	20	Sanitary Building	880	—	—	—	—
A14460	21	Sanitary Building	881	—	—	—	—
A12575	22	Student Store Building	1,322	—	—	—	—
A12575	23	Cafeteria Building	29,347	—	—	—	—
N/A	C	Food Service / Maintenance & Operations	—	—	15,521	—	15,521
N/A	N/A	Lunch Shelter	—	—	5,000	—	5,000
A12575	24	Utility Building	6,375	—	—	—	—
A12575	25	Classroom Bldg. F	—	9,408	—	—	9,408
A12575	26	Classroom Bldg. H	—	9,441	—	—	9,441
A14460	27	Classroom Bldg. K	—	9,624	—	—	9,624
A12575	28	Classroom Bldg. G	—	6,708	—	—	6,708
A14460	29	Classroom Bldg. J	—	6,708	—	—	6,708
A14460	30	Classroom Bldg. L	—	6,870	—	—	6,870
A12575	31	Math & Science Bldg. M	27,404	—	—	—	—
A22093	32	Two/Three Unit Relocatable	2,668	—	—	—	—
A22093	33	Two/Three Unit Relocatable	2,946	—	—	—	—
N/A	37	Storage Unit 3	—	—	—	176	176
A29134	39	Classroom Bldg. N	9,708	—	—	—	—
A12575	40	Agricultural Building	—	—	—	1,873	1,873
A14460	41	Lath House (Former R0031n)	—	—	—	1,344	1,344

3. Project Description

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

Bldg. ID*	Bldg. No.	Building Name	Demolition/ Removal (sf)	Remodel (sf)	New Construction (sf)	Existing to Remain (sf)	Total (sf)
A14460	42	Greenhouse 1	—	—	—	174	174
N/A	43	Storage Unit Relocatable	—	—	—	160	160
A13586	45	Girl's Gymnasium Building	18,117	—	—	—	—
A13586	46	Boys Gymnasium Building	31,294	—	—	—	—
N/A	D	Gymnasium Building	—	—	42,677	—	42,677
A14460	49	Ticket Booth Relocatable	—	—	—	43	43
A14460	50	Sanitary Building	—	—	—	1,125	1,125
A14460	55	Sanitary Building	—	—	—	849	849
N/A	56	Storage Unit 4	—	—	—	360	360
N/A	57	Concessions Bldg.	804	—	—	—	—
N/A	F	New 2-Story Classroom Building	—	—	21,090	—	21,090
N/A	64	Single Unit Modular	960	—	—	—	—
N/A	65	Single Unit Modular	960	—	—	—	—
N/A	66	Single Unit Modular	960	—	—	—	—
N/A	67	Single Unit Modular	960	—	—	—	—
N/A	80	Single Unit Modular (classroom)	960	—	—	—	—
N/A	81	Single Unit Modular (classroom)	960	—	—	—	—
Total			206,521	76,241	196,025	36,566	308,832

Note: sf = square feet. Campus improvements based on Existing Site Plan Exhibit A.1.1. Square footages based on Space Program Exhibit D.1.

There are approximately 319,328 square feet of building space on the campus. Following completion of the Project the campus would have about 308,832 total square feet. The Project would remove or demolish 39 existing classrooms and construct 39 new classrooms for an unchanged total of 103 classrooms.

Because the new buildings are only conceptually designed, their architectural style, form, and mass are unknown at this time. However, as shown in Figure 8, the proposed arrangement of buildings would respect the overall layout of the existing campus by clustering non-classroom buildings (e.g., administration building, gymnasium, library, auditorium, and cafeteria) around the existing landscaped “polygon.” Security lighting would be provided using lighting fixtures that are designed to reduce glare, light trespass, and sky glow.

As shown in Table 3, approximately 28 parking spaces would be added as part of the Project. This would include the reconfiguration of existing Lots P-1, P-3, and P-4 and removal of two smaller parking lots (Lots 1.2 and 6). The most notable change would be Lot P-1’s expansion and reconfiguration from 150 to 216 spaces. At Project completion, a total of 534 parking spaces would be provided onsite.

3. Project Description

Table 3 Changes to Onsite Campus Parking

Parking Lot	Number of Spaces		
	Existing	Proposed	Change
P-1.1	81	216	+66
P-1.2	69		
P-2	32	16	-16
P-3	64	64	—
P-4	132	132	—
P-5	91	91	—
P-6	22	0	-22
P-7	15	15	—
Total	506	534	+28

The modernization Project would not change the current capacity of the school or affect student enrollment. No changes to traditional school operations, school-related events, or community use would occur as the result of this Project.

Excavation and Off-Site Disposal

Soil sampling conducted for the Preliminary Environmental Assessment-Equivalent Report (PEA-E) prepared for the Project identified elevated lead concentrations in two planter locations.³¹ Following the recommendations of the PEA-E, the impacted soil was removed in July 2017. Standard procedures were implemented when removing the impacted soil. Following soil removal, confirmation sampling verified that the extent of the impacted soil had been remediated.³²

Modifications to the Methane Monitoring and Mitigation System

As part of the Project, the automatic gas detection and alarm system at Polytechnic HS would be deactivated and removed. Following implementation of the Project, the school would rely completely on a passively vented buffer zone under new buildings and pavements between existing buildings and the landfill.

3.1.2 Interim Housing

As shown in Figure 10, *Interim Housing Optional Locations*, conceptual locations within the campus have been identified for interim housing of students during Project construction. Per LAUSD requirements, the design-build team will design, install, and construct all temporary facilities in accordance with the phasing plan that LAUSD project management team has approved. These temporary portable buildings would provide all facilities to maintain a fully functional campus during all construction phases. While it is expected that all facilities will be located on the Polytechnic HS campus during all construction phases, there is the possibility that facilities on the Byrd Middle School campus, such as the auditorium or gymnasium, may be used by

³¹ CES Group. May 9, 2017. PEA Equivalent Investigation Report for John H. Francis Polytechnic High School.

³² CES Group. September 7, 2017. Technical Memorandum for Limited Soil Removal at John H. Francis Polytechnic High School.

3. Project Description

Polytechnic HS during construction of the Project. A minimum of 200 parking spaces for faculty and staff and 25 spaces for visitors will be maintained onsite during construction.

3.2 CONSTRUCTION SCHEDULE

Project construction is anticipated to start in Q1-2019, and is expected to take 3 to 5 years to complete. While the phasing of the work has not yet been determined, this analysis assumes that there will be two 18-month phases. The actual duration of construction would likely be longer; however, by assuming the shortest expected construction duration this study is taking a more conservative approach with regard to the air quality analysis. Because of active school operation, less than five acres (contiguous) on campus would be disturbed at any one time. An average of 50 workers would be onsite when students are present and a maximum of 150 workers would be onsite during peak periods (i.e., during summer break).³³

Table 4 shows the types and amounts of construction equipment that are anticipated to be used for implementation of the Project. Figure 11, *Approximate Construction Areas* shows the demolition and construction areas.

Table 4 Anticipated Construction Equipment

Phase 1 & 2	Schedule	Equipment	Maximum Number/Day
Demolition/Interim Housing/Modernization (i.e., Building Interiors)	2 months	Excavators w/breaker	1
		Loader	1
		Bobcat/Skip	1
		Crushing Equipment	1
		Water Truck	1
		Building Debris haul trips; average 10 CY end-dump trucks	10
		Asphalt/Concrete Debris haul trips; average 10 CY end-dump trucks	10
		Jack Hammers/Air Compressor	2
Site Prep/Modernization	2 months	Excavator	1
		Compactor	1
		Loader	1
		Skip Loader	1
		Water Truck	1
		Soil haul trips (soil export); average 14 CY bottom dump trucks	35
		Vibratory Rollers (for 95% soil compaction)	2
		Trencher / Excavator	1

³³ Worker trips based on California Emissions Estimator Model (CalEEMod), version 2016.3.1.

3. Project Description

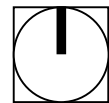
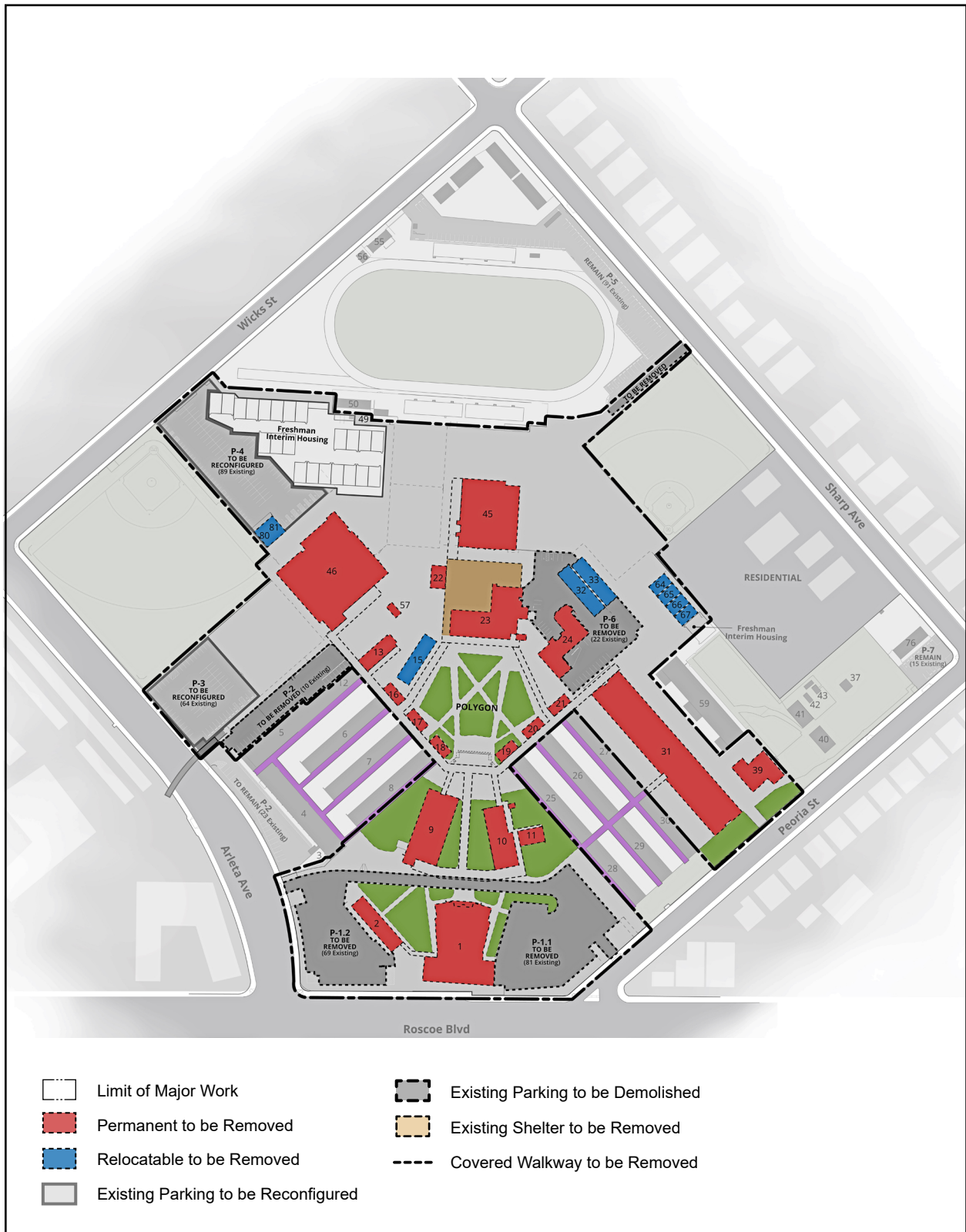
Table 4 Anticipated Construction Equipment

Phase 1 & 2	Schedule	Equipment	Maximum Number/Day
Building Construction /Modernization	12 Months	Concrete Trucks	5
		Impact Pile Driver, Sonic Pile Driver, Crane-Mounted Auger Drill, or Crane-Suspended Downhole Vibrator	1
		Concrete Pump	1
		Crane	1
		Dump Trucks	2
		Fork Lifts/Gradalls	4
		Delivery Trucks	12
		Backhoes	2
		Air Compressor	1
Asphalt Paving and Off-Site Street Work	2 months	Skip Loaders	2
		Roller	1
		Paver	1
		Asphalt Trucks	8
		Water Truck	1

3. Project Description

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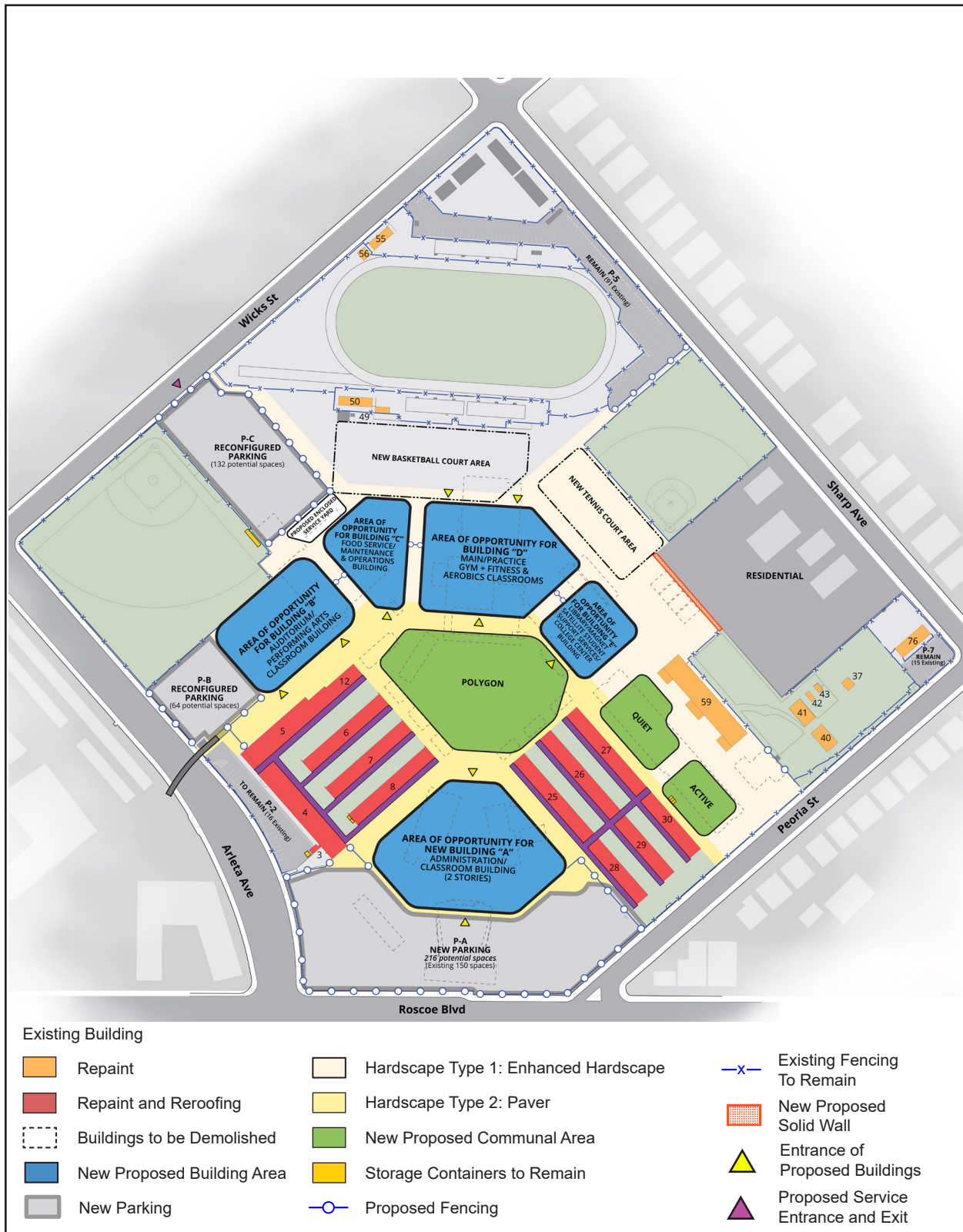
Figure 7 - Building Removal
 3. Project Description



3. Project Description

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Figure 8 - Campus Improvements
3. Project Description



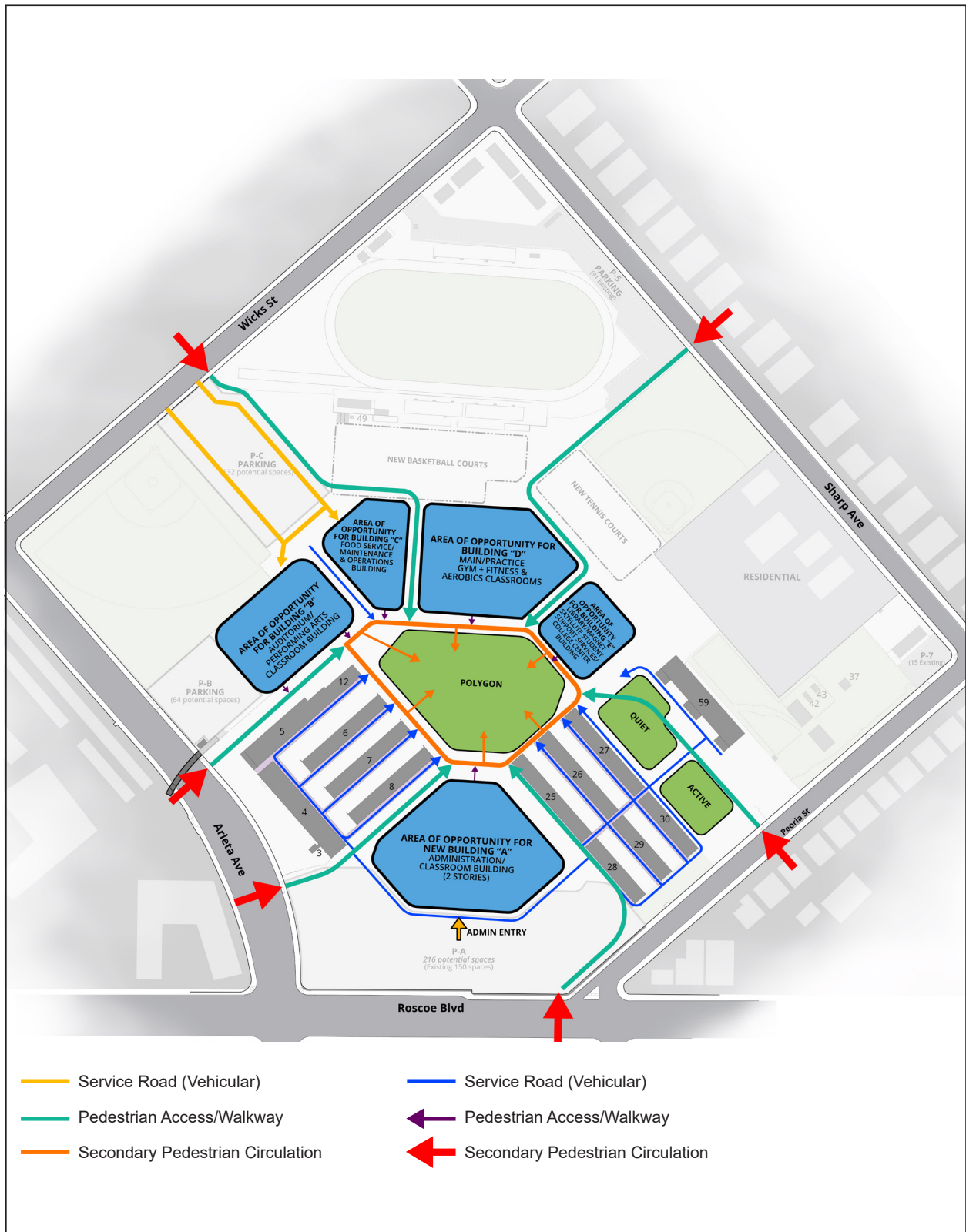
Source: NAC Architect, 2010



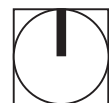
3. Project Description

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Figure 9 - New Campus Circulation
 3. Project Description



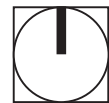
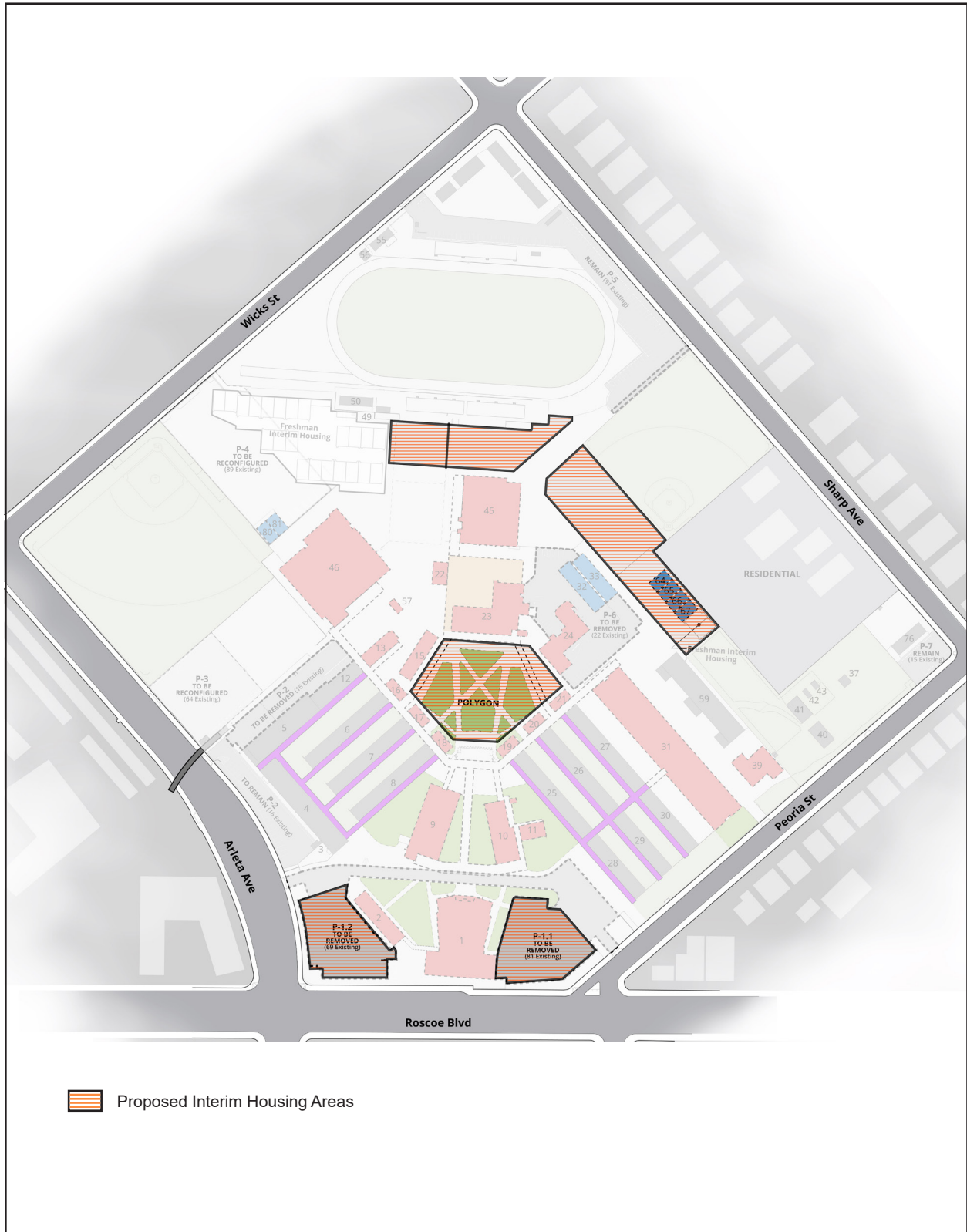
Source: NAC Architect, 2017



3. Project Description

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Figure 10 - Interim Housing Optional Locations
3. Project Description



3. Project Description

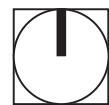
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Figure 11 - Approximate Construction Areas
 3. Project Description



Source: NAC Architect, 2017

0 350
 Scale (Feet)



3. Project Description

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4. Environmental Checklist and Analysis

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

DETERMINATION

On the basis of this initial evaluation:

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

Signature

Robert Laughton

Printed Name

Date

CEQA Officer

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 incorporated, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.
- 4) "Less Than Significant with Mitigation Incorporated" applies where the incorporation of a mitigation measure has reduced an effect from "Potentially Significant Impact" to "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from "Earlier Analysis," as described in (5) below may be cross referenced).
- 5) Earlier analysis must be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration (CEQA Guidelines Section 15063 [c][3][D]). In this case, a brief discussion should identify the following:
 - a) Earlier Analysis Used. Identify and state where they are available for review.
 - b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
 - c) Mitigation Measures. For effects that are "Less Than Significant with Mitigation Measures Incorporated," describe the mitigation measures that were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
- 6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.
- 7) Supporting Information Sources: A sources list should be attached, and other sources used or individuals contacted should be cited in the discussion.
- 8) The explanation of each issue should identify:
- 9) The significance criteria or threshold, if any, used to evaluate each question, and
- 10) The mitigation measure identified, if any, to reduce the impact to less than significance.

4. Environmental Checklist and Analysis

ENVIRONMENTAL IMPACTS

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

Explanation:

LAUSD adopted Standard Conditions of Approval (SCs) that apply uniformly to all projects proposed by the District. Applicable SCs would minimize Project-related aesthetic impacts and are shown in the table below.

LAUSD Standard Conditions of Approval	
SC-AE-1	School Design Guide* This document requires the consideration of architectural appearance and consistency and other aesthetic factors during the preliminary design review for a proposed school upgrade project. Architectural quality must consider compatibility with the surrounding community.
SC-AE-6	School Design Guide. This document outlines requirements for lighting and measures to minimize glare for pedestrians, drivers and sports teams, and to avoid light spilling onto adjacent properties.
SC-AE-7	LAUSD shall reduce the lighting intensity from the new sources on adjacent residences to no more than two foot-candles, measured at the residential property line. LAUSD shall utilize hoods, filtering louvers, glare shields, and/or landscaping as necessary to achieve the standard. The lamp enclosures and poles shall also be painted to reduce reflection. Following installation of lights the lighting contractor shall review and adjust lights to ensure the standard is met.
SC-AE-8	Design site lighting and select lighting styles and technologies to have minimal impact off-site and minimal contribution to sky glow. Minimize outdoor lighting of architectural and landscape features and design interior lighting to minimize trespass outside from the interior. International Dark-Sky Association (IDA) and the Illuminating Engineering Society (IES) Model Lighting Ordinance (MLO) shall be used a guide for environmentally responsible outdoor lighting. The MLO outdoor lighting has outdoor lighting standards that reduce glare, light trespass, and skyglow. The Joint IDA-IESNA Model Outdoor Lighting Ordinance (MLO) uses lighting zones (LZ0-4) which allow the District to vary the stringency of lighting restrictions according to the sensitivity of the area as well as consideration for the community. The MLO also incorporates the Backlight-Uplight-Glare (BUG) rating system for luminaires, which provides more effective control of unwanted light. IDA-IESNA Model establishes standards to: <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

Notes: Text in *italics* shows specific requirements identified in the criteria or condition.

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

4. Environmental Checklist and Analysis

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

No Impact. Vistas provide visual access or panoramic views to a large geographic area. The field of view from a vista location can be wide and extend into the distance. Panoramic views are usually associated with vantage points looking out over a section of urban or natural areas that provide a geographic orientation not commonly available. Examples of panoramic views include an urban skyline, valley, mountain range, the ocean, or other water bodies.³⁴

The school campus and surrounding area are flat and developed with urban land uses, including residential, commercial, education, and recreation uses. The school campus has many one- and two-story buildings, surface parking, play fields, hardcourts, student gathering areas, and ornamental trees and landscaping. Although the Project would include new buildings, there are no protected or designated scenic vistas or views in the project vicinity. New buildings would be located in the interior of the campus away from the public right of way (i.e., view corridors along streets with views toward the San Gabriel Mountains, such as Peoria Street and Roscoe Boulevard), and would have an overall height profile similar to existing buildings. Project development would not obscure any scenic vistas. Therefore, no impact would occur and no further analysis 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 only officially designated state scenic highway in Los Angeles County is State Route 2 (SR-2; Angeles Crest Highway) approximately 9 miles east of the school campus.³⁵ The proposed structures associated with the Project would not be visible from SR-2. The school is also over 2 miles away from the nearest City-designated scenic highways—La Tuna Canyon Road and Sunland Boulevard—which are both approximately two miles to the east.³⁶ Project development would not result in impacts to scenic resources within a designated state scenic highway. Therefore, no impact would occur and no further analysis is required.

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

Less Than Significant Impact. The school campus is in an urbanized area and surrounded by residential, commercial, educational, and recreational uses. The Project includes demolition of one- and two-story buildings, removal of portable buildings, and construction of one- and two-story buildings, along with other improvements. Views of the school from the surrounding neighborhood would not change substantially, because most of the new buildings are near the center of the campus. The building most visually prominent from the surrounding neighborhood under existing conditions—the Auditorium Building adjacent to Roscoe Boulevard—would be demolished and replaced with surface parking. The new building proposed for this

³⁴ City of Los Angeles, LA CEQA Thresholds Guide, Chapter A, 2006.

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

³⁵ California Department of Transportation (Caltrans). Updated September 7, 2011. California Scenic Highway Mapping System. http://www.dot.ca.gov/hq/LandArch/16_livability/scenic_highways/index.htm.

³⁶ City of Los Angeles. 1998. Transportation Element Scenic Highways Map. http://cityplanning.lacity.org/cwd/gnlpln/transelt/TEMaps/E_Scnc.gif

4. Environmental Checklist and Analysis

southernmost part of the campus would be shifted approximately 150 feet northward away from the public right-of-way, reducing the school's overall visual impact on Roscoe Boulevard.

Overall, consolidation of many buildings (including modular relocatable classroom buildings) into six new larger clustered buildings would increase visual unity in the central portion of the campus. Additionally, as required in SC-AE-1, the new buildings would be designed with consideration for architectural appearance and consistency with the other buildings on campus. Therefore, impacts to the visual character and quality of the school campus and surrounding uses would be less than significant and no further analysis 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 school campus is in an urban setting and is fully developed. The existing school generates nighttime light from field lights, security and parking lot lights, and building lights (interior and exterior). Surrounding land uses also generate significant light from street lights, vehicle lights, parking lot lights, and building lights. The two major causes of light pollution in this setting are spill light and glare. Spill light is caused by misdirected light that illuminates areas outside the area intended to be lit. Glare occurs when a bright object is against (or reflects off) a dark background or shiny surface.

The Project would not significantly increase nighttime lighting on the campus since new buildings would be within the campus interior and away from the public right-of-way. Furthermore, the Project does not propose improvements to existing athletic fields (which are located around the campus's periphery adjacent to Arleta Avenue, Wicks Street, and Sharp Avenue) and would therefore not introduce any new sources of high-intensity nighttime lighting. The Project would be consistent with the existing lighting on the campus. Any new security and path lights would be focused and directed to reduce spill light and glare off the campus. Implementation of SC-AE-6, SC-AE-7 and SC-AE-8 would further ensure that site lighting would have minimal undesired offsite impacts.

Consistent with CHPS SS 12.0, lighting for the Project would not introduce lights at substantially greater intensities than existing lights on and near the school, and the Project would have no impact on nighttime views. Light and glare impacts would be less than significant and no further analysis is required.

4. Environmental Checklist and Analysis

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

Explanation:

There are no LAUSD Standard Conditions of Approval (SCs) for minimizing impacts to agriculture and forestry resources.

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

No Impact. The Project would not convert farmland to non-agricultural uses. There is no agricultural or farm use on or in the vicinity of the campus; therefore, no Project-related farmland conversion would occur.

4. Environmental Checklist and Analysis

The campus is fully developed and is not mapped as important farmland on the California Important Farmland Finder.^{37,38} No impact would occur and no further analysis is required.

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

No Impact. The Project would not conflict with agricultural zoning or a Williamson Act contract. The existing zoning for the site is PF (Public Facilities).³⁹ The site is not zoned for agricultural use, and Project development would not conflict with such zoning. Williamson Act contracts restrict the use of privately owned land to agriculture and compatible open-space uses under contract with local governments; in exchange, the land is taxed based on actual use rather than potential market value. There is no Williamson Act contract in effect onsite.⁴⁰ No impact would occur and no further analysis 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. Project development would not conflict with existing zoning for forest land, timberland, or timberland production. Forest land is defined as “land that can support 10-percent native tree cover of any species, including hardwoods, under natural conditions, and that allows for management of one or more forest resources, including timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, and other public benefits.”⁴¹ Timberland is defined as “land...which is available for, and capable of, growing a crop of trees of any commercial species used to produce lumber and other forest products, including Christmas trees.”⁴² The campus is zoned for school use as a public facility and is not zoned for forest land or timberland use.⁴³ No impact would occur and no further analysis is required.

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

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

³⁷ Division of Land Resource Protection (DLRP). Accessed July 13, 2017. California Important Farmland Finder. <http://maps.conservation.ca.gov/ciff/ciff.html>.

³⁸ Most of urbanized Los Angeles County, including the project site, is not mapped on the California Important Farmland Finder due to a lack of farmland.

³⁹ City of Los Angeles. Accessed July 13, 2017. Zoning Map. <http://zimas.lacity.org/>.

⁴⁰ California Department of Conservation, Division of Land Resources Protection. 2015. Map of Williamson Act Contract Land. ftp://ftp.consrv.ca.gov/pub/dlrp/wa/2014%20Statewide%20Map/WA_2014_11x17.pdf

⁴¹ California PRC Section 12220(g).

⁴² California PRC Section 4526.

⁴³ City of Los Angeles. Accessed July 13, 2017. Zoning Map. <http://zimas.lacity.org/>.

4. Environmental Checklist and Analysis

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

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

4. Environmental Checklist and Analysis

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

Explanation:

LAUSD adopted Standard Conditions of Approval (SCs) that apply uniformly to all projects proposed by the District. Applicable SCs would minimize Project-related air quality impacts and are shown in the table below.

LAUSD Standard Conditions of Approval	
SC-AQ-2	LAUSD's construction contractor shall ensure that construction equipment is properly tuned and maintained in accordance with manufacturer's specifications, to ensure excessive emissions are not generated by unmaintained equipment.
SC-AQ-3	<p>LAUSD's construction contractor shall:</p> <ul style="list-style-type: none"> • Maintain slow speeds with all vehicles. • Load impacted soil directly into transportation trucks to minimize soil handling. • Water/mist soil as it is being excavated and loaded onto the transportation trucks. • Water/mist and/or apply surfactants to soil placed in transportation trucks prior to exiting the site. • Minimize soil drop height into transportation trucks or stockpiles during dumping. • During transport, cover or enclose trucks transporting soils, increase freeboard requirements, and repair trucks exhibiting spillage due to leaks. • Cover the bottom of the excavated area with polyethylene sheeting when work is not being performed. • Place stockpiled soil on polyethylene sheeting and cover with similar material. • Place stockpiled soil in areas shielded from prevailing winds.
SC-AQ-4	<p>LAUSD shall prepare an air quality assessment.</p> <p>If site-specific review of a school construction project identifies potentially significant adverse regional and localized construction air quality impacts, then LAUSD shall implement all feasible measures to reduce air emissions below the South Coast Air Quality Management District's (SCAQMD) regional and localized significance thresholds.</p> <p>LAUSD shall mandate that construction bid contracts include the measures identified in the air quality assessment. Measures shall reduce construction emissions during high-emission construction phases from vehicles and other fuel driven construction engines, activities that generate fugitive dust, and surface coating operations. Specific air emission reduction measures include, but are not limited to, the following:</p> <p><u>Exhaust Emissions</u></p> <ul style="list-style-type: none"> • Schedule construction activities that affect traffic flow to off-peak hours (e.g. between 10:00 AM and 3:00 PM). • Consolidate truck deliveries and/or limit the number of haul trips per day.

4. Environmental Checklist and Analysis

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

Fugitive Dust

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

General Construction

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

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

The primary air pollutants of concern for which ambient air quality standards (AAQS) have been established are ozone (O₃), carbon monoxide (CO), coarse inhalable particulate matter (PM₁₀), fine inhalable particulate matter (PM_{2.5}), sulfur dioxide (SO₂), nitrogen dioxide (NO₂), and lead (Pb). Areas are classified under the National and California Clean Air Act as either in attainment or nonattainment for each criteria pollutant based on whether the AAQS have been achieved. The South Coast Air Basin (SoCAB), which is managed by

4. Environmental Checklist and Analysis

the South Coast Air Quality Management District (SCAQMD), is designated nonattainment for O₃, and PM_{2.5} under the California and National AAQS, nonattainment for PM₁₀ under the California AAQS, and nonattainment for lead (Los Angeles County only) under the National AAQS.⁴⁴

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

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

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

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

Less Than Significant Impact.

Short-Term Air Quality

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

Construction activities would occur on approximately 5 acres of the 37.2-acre school campus and would involve demolition; construction of new buildings; renovation of several existing buildings; installation temporary portable buildings; and paving. Construction activities would start in Q1-2019 and, as discussed in the Project Description, the Project's construction duration is expected to be a minimum of 3 years, but could be up to 5 years. The shorter construction duration would require more equipment to be operating simultaneously, resulting in greater daily emissions. When analyzing the air quality impacts of the Project, a conservative assumption of a 36-month construction duration, the shortest expected construction duration, was used. Construction emissions were estimated using the California Emissions Estimator Model

⁴⁴ California Air Resources Board (CARB). 2016, December. Area Designations Maps/State and National. <http://www.arb.ca.gov/design/adm/adm.htm>.

4. Environmental Checklist and Analysis

(CalEEMod), version 2016.3.1, based on the Project’s preliminary construction schedule, phasing, and equipment list provided by LAUSD and include the LAUSD 2014 CHPS prerequisites and implementation of SC-AQ-2 through SC-AQ-4. The construction schedule and equipment mix were based on preliminary designs and are subject to changes during final design and as dictated by field conditions. Results of the construction emission modeling are shown in Table 5. As shown, air pollutant emissions from construction-related activities would have potential impacts from VOC during Phase 2.

Table 5 Maximum Daily Regional Construction Emissions

Source	Criteria Air Pollutants (lbs/day) ^{1,2,3}					
	VOC	NO _x	CO	SO ₂	PM ₁₀	PM _{2.5}
2019						
Phase 1 – Demolition	2	23	19	<1	3	1
Phase 1 – Demo + Portable Installation	3	29	24	<1	4	2
Phase 1 – Site Prep/Grading + Portable Installation	3	34	23	<1	3	2
Phase 1 – Site Prep/Grading	2	27	18	<1	2	1
Phase 1 Building Construction	4	38	33	<1	3	2
2020						
Phase 1 – Building Construction	4	35	33	<1	2	2
Phase 1 – Building Construction + Architectural Coating	32	37	35	<1	3	2
Phase 1 – Asphalt Paving	2	14	14	<1	1	1
Phase 2 – Demolition	3	28	27	<1	3	2
Phase 2 – Site Prep/Grading	2	25	18	<1	2	1
Phase 2 – Building Construction	4	41	40	<1	4	2
2021						
Phase 2 – Building Construction	4	38	39	<1	4	2
Phase 2 – Building Construction + Architectural Coating	82	60	66	<1	6	3
Phase 2 – Temporary Portables Removal + Asphalt Paving	3	19	23	<1	5	2
2022						
Phase 2 – Temporary Portables Removal + Asphalt Paving	2	12	13	<1	1	1
Maximum Daily Emissions	82	60	66	<1	6	3
SCAQMD Regional Threshold	75	100	550	150	150	55
Exceeds Regional Threshold?	Yes	No	No	No	No	No

Source: CalEEMod, version 2016.3.1.

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

¹ The construction schedule is based on information provided/confirmed by the LAUSD. Where specific information regarding project-related construction activities was not available, construction assumptions were based on CalEEMod defaults, which are based on construction surveys conducted by SCAQMD.

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

³ The proposed school would incorporate LAUSD Standard Conditions of Approval SC-AQ-2, which requires ensuring that construction equipment is properly tuned and maintained. This requirement would further contribute in minimizing generation of criteria air pollutant emissions during construction.

4. Environmental Checklist and Analysis

As shown, air pollutant emissions from construction-related activities would exceed SCAQMD regional thresholds for VOC. The paints and coatings used for the proposed Project would comply with CHPS EQ 5.0 & 7.0. EQ 7.0 which requires paints and coatings meet the applicable VOC content requirements of the California Air Resources Board (CARB) 2007, Suggested Control Measure (SCM) for Architectural Coatings, or the South Coast Air Quality Management District (SCAQMD) Rule 1113, effective June 3, 2011. SCAQMD Rule 1113 requires the use of architectural coatings with VOC content of 50 grams/liter or less for all interior paints. Compliance with CHPS and SCAQMD regulations would ensure the project's regional construction emissions are less than significant as shown in Table 6. Therefore, regional impacts from Project-related construction activities would be less than significant and no further analysis is required.

Table 6 Maximum Daily Regional Construction Emissions—VOC Adjustment

Source	Criteria Air Pollutants (lbs/day) ^{1,2,3,4}					
	VOC	NO _x	CO	SO ₂	PM ₁₀	PM _{2.5}
2021						
Phase 2 – Building Construction	4	38	39	<1	4	2
Phase 2 – Building Construction + Architectural Coating	55	60	66	<1	6	3
Maximum Daily Emissions	55	60	66	<1	6	3
SCAQMD Regional Threshold	75	100	550	150	150	55
Exceeds Regional Threshold?	No	No	No	No	No	No

Source: CalEEMod, version 2016.3.1.

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

¹ The construction schedule is based on information provided/confirmed by the LAUSD. Where specific information regarding project-related construction activities was not available, construction assumptions were based on CalEEMod defaults, which are based on construction surveys conducted by SCAQMD.

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

³ The proposed school would incorporate LAUSD SC-AQ-2, which requires ensuring that construction equipment is properly tuned and maintained. This requirement would further contribute in minimizing generation of criteria air pollutant emissions during construction.

⁴ The paints and coatings VOC includes compliance with SCAQMD Rule 1113.

Long-Term Air Quality

Long-term air pollutant emissions are typically generated by area sources (e.g., landscaping equipment fuel use, aerosols, and architectural coatings), mobile sources from vehicle trips, and energy use (natural gas) associated with new buildings. The Project would demolish several existing school buildings and construct new buildings in their place (see Chapter 3, *Project Description*, for further details). Following implementation of the Project, be a reduction of total building square footage. Also, the new buildings would meet the latest Building Energy Efficiency Standards and the California Green Building Standards Code (CALGreen) and would be more energy efficient. In addition, the primary source of long-term criteria air pollutant emissions is from mobile sources. Because the Project would not increase the number of students or the capacity of the school, it would not introduce new vehicle trips. Thus, the Project would not result in an increase in long-term criteria air pollutant emissions. Therefore, regional operation-phase air quality impacts would be less than significant and no further analysis is required.

4. Environmental Checklist and Analysis

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

Less Than Significant Impact. The SoCAB is designated nonattainment for O₃ and PM_{2.5} under the California and National AAQS, nonattainment for PM₁₀ under the California AAQS, and nonattainment for lead under the National AAQS.⁴⁵ According to SCAQMD methodology, any project that does not exceed or can be mitigated to less than the daily threshold values would not add significantly to a cumulative impact.⁴⁶ As discussed in Section III(b), operational activities would not result in emissions in excess of SCAQMD's significant thresholds. Therefore, the Project would not result in a cumulatively considerable net increase in criteria pollutants and impacts would be less than significant. No further analysis is required.

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

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

Construction Localized Significance Thresholds

Localized significance thresholds (LSTs) are based on the California AAQS, which are the most stringent AAQS that have been established to provide a margin of safety in the protection of public health and welfare. They are designated to protect sensitive receptors most susceptible to further respiratory distress, such as asthmatics, the elderly, young children, people already weakened by other disease or illness, and people engaged in strenuous work or exercise. Construction LSTs are based on the size of the construction site, distance to the nearest sensitive receptor, and Source Receptor Area.⁴⁷ The nearest offsite receptors proximate to the construction site are the single-family residences to the east approximately 80 feet. Per LST methodology, any distance within 82 feet has the same screening-level LST values. Therefore, offsite and onsite receptors within the minimum distance of 82 feet are analyzed under the LST construction impact.

Air pollutant emissions generated by construction activities would cause temporary increases in air pollutant concentrations. Table 7 shows the Project's maximum daily construction emissions (pounds per day) generated during construction activities compared with the SCAQMD's screening-level construction LSTs.⁴⁸ As shown, the maximum daily NO_x, CO, PM₁₀, and PM_{2.5} construction emissions generated from onsite construction-related activities would be less than SCAQMD screening-level construction LSTs. Therefore, Project-related construction activities would not have the potential to expose sensitive receptors to substantial

⁴⁵ California Air Resources Board (CARB). 2016, December. Area Designations Maps/State and National. <http://www.arb.ca.gov/degis/adm/adm.htm>.

⁴⁶ South Coast Air Quality Management District (SCAQMD). 1993. California Environmental Quality Act Air Quality Handbook.

⁴⁷ Source Receptor Area: Using this meteorological data set, LSTs are developed for each of the 37 source receptor areas (SRAs) within the SCAQMD's jurisdiction. The school is in SRA 8 (West San Gabriel Valley).

⁴⁸ For purposes of this analysis, the screening-level construction LSTs are based on a disturbed acreage per day of one acre or less, which represent a conservative analysis as a larger disturbed acreage per day would generate higher screening-level LST values.

4. Environmental Checklist and Analysis

pollutants and localized construction air quality impacts would be less than significant. No further analysis is required.

Table 7 Localized Construction Emissions

Source (based on acres disturbed)	Pollutants(lbs/day) ^{1,2}			
	NO _x	CO	PM ₁₀	PM _{2.5}
2019				
Phase 1 – Demolition	16	17	2.22	1.19
Phase 1 – Demo + Portable Installation	22	19	2.47	1.42
Phase 1 – Portables Installation	6	2	0.25	0.23
Phase 1 – Site Prep/Grading + Portable Installation	22	17	1.31	1.20
Phase 1 – Site Prep/Grading	16	15	1.05	0.96
Phase 1 Building Construction	34	30	1.82	1.71
2020				
Phase 1 – Building Construction	32	29	1.60	1.50
Phase 1 – Building Construction + Architectural Coating	33	31	1.71	1.61
Phase 1 – Asphalt Paving	12	12	0.65	0.61
Phase 2 – Demolition	21	25	2.49	1.47
Phase 2 – Site Prep/Grading	15	15	0.95	0.87
Phase 2 – Building Construction	32	29	1.60	1.50
2021				
Phase 2 – Building Construction	29	29	1.39	1.31
Phase 2 – Building Construction + Architectural Coating	51	55	2.74	2.66
Phase 2 – Temporary Portables Removal + Asphalt Paving	16	14	0.78	0.72
2022				
Phase 2 – Temporary Portables Removal + Asphalt Paving	14	14	0.67	0.62
SCAQMD ≤1.00-acre LST^{3,4}	80	498	4.00	3.00
Exceeds LST?	No	No	No	No

Source: CalEEMod Version 2016.3.1.

Notes: In accordance with SCAQMD methodology, only onsite stationary sources and mobile equipment occurring on the construction site are included in the analysis. LSTs are based on receptors within 82 feet (25 meters) of the school in Source Receptor Area (SRA) 7.

- ¹ The construction schedule is based on information provided/confirmed by the District. Where specific information regarding project-related construction activities was not available, construction assumptions were based on CalEEMod defaults, which are based on construction surveys conducted by SCAQMD.
- ² Includes implementation of fugitive dust control measures required by SCAQMD under Rule 403 and consistent with LAUSD Standard Condition of Approval SC-AQ-3, which involves watering disturbed areas a minimum of two times per day, reducing speed limit to 15 miles per hour on unpaved surfaces, replacing ground cover quickly, and street sweeping with Rule 1186-compliant sweepers. The proposed project would also incorporate LAUSD Standard Conditions of Approval SC-AQ-2, which requires ensuring that construction equipment is properly tuned and maintained. This requirement would further contribute in minimizing generation of criteria air pollutant emissions during construction.
- ³ The LST Methodology uses lookup tables based on site acreage to determine the significance of emissions for CEQA purposes. The acreage disturbed is the maximum daily disturbed acreage determined using the equipment mix for the different construction activities for this project.
- ⁴ South Coast Air Quality Management District (SCAQMD). 2008, June. Final Localized Significance Threshold Methodology. <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/localized-significance-thresholds>; SCAQMD. 2011. Fact Sheet for Applying CalEEMod to Localized Significance Thresholds. <http://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/caleemod-guidance.pdf>.

4. Environmental Checklist and Analysis

Construction Emission Health Risk

Emissions from construction equipment primarily consist of diesel particulate matter (DPM). In March 2015 the Office of Environmental Health Hazards Assessment (OEHHA) adopted new guidance for the preparation of health risk assessments. OEHHA developed a cancer risk factor and non-cancer chronic reference exposure level for DPM, but these factors are based on continuous exposure over a 30-year time frame. No short-term acute exposure levels have been developed for DPM. The Project would be constructed over approximately 3 years, which would limit the exposure to receptors. Additionally, construction activities would not exceed the screening-level LST significance thresholds. Therefore, construction emissions would not pose a threat to receptors at or near the construction site and Project-related construction health impacts would be less than significant. No further analysis is required.

Operational Localized Significance Thresholds

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

Carbon Monoxide Hotspots

The SoCAB has been designated “attainment” for CO under both the national and California AAQS. Under existing and future vehicle emission rates, a project would have to increase traffic volumes at a single intersection by more than 44,000 vehicles per hour—or 24,000 vehicles per hour where vertical and/or horizontal mixing is substantially limited—in order to generate a significant CO “hotspot” impact.⁴⁹ The Project would not increase the number of students and would not result in generation of additional vehicle trips compared to existing conditions. Thus, the Project would not increase CO hotspots at intersections in the vicinity of the school. Localized air quality impacts related to mobile-source emissions would be less than significant and no further analysis is required.

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

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

A person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury

⁴⁹ Bay Area Air Quality Management District (BAAQMD). 2017. California Environmental Quality Act Air Quality Guidelines. BAAQMD has specific screening criteria for determining CO impacts, but SCAQMD does not.

4. Environmental Checklist and Analysis

or damage to business or property. The provisions of this rule shall not apply to odors emanating from agricultural operations necessary for the growing of crops or the raising of fowl or animals.

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

4. Environmental Checklist and Analysis

	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 type="checkbox"/>	<input checked="" type="checkbox"/>
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance (e.g., oak trees or California walnut woodlands)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Explanation:

LAUSD adopted Standard Conditions of Approval (SCs) that apply uniformly to all projects proposed by the District. Applicable SCs would minimize Project-related biological resource impacts and are shown in the table below.

LAUSD Standard Conditions of Approval	
SC-BIO-3	<p>LAUSD shall comply with the following:</p> <ul style="list-style-type: none"> Project activities (including, but not limited to, staging and disturbances to native and nonnative vegetation, structures, and substrates) should occur outside of avian breeding season to avoid take of birds or their eggs. Depending on the avian species present, a qualified biologist may determine that a change in the breeding season dates is warranted. If avoidance of the avian breeding season is not feasible, beginning 30 days prior to the initiation of the project activities, a qualified biologist with experience in conducting breeding bird surveys shall conduct weekly bird surveys to detect protected native birds occurring in suitable nesting habitat that is to be disturbed and (as access to adjacent areas allows) any other such habitat within 300 feet of the disturbance area (within 500 feet for raptors). The surveys shall continue on a weekly basis with the last survey being conducted no more than three days prior to the initiation of project activities. If a protected native bird is found, LAUSD shall delay all project activities within 300 feet of the suitable nesting habitat (within 500 feet for suitable raptor nesting habitat) until August 31. Alternatively, the qualified biologist could continue the surveys in order to locate any nests. If an active nest is located, project activities within 300 feet of the nest (within 500 feet for raptor nests), or

4. Environmental Checklist and Analysis

<p>as determined by a qualified biologist, shall be postponed until the nest is vacated and juveniles have fledged and there is no evidence of a second attempt at nesting. Flagging, stakes, and/or construction fencing shall be used to demarcate the inside boundary of the 300- or 500-foot buffer between the project activities and the nest. Project personnel, including all contractors working on site, shall be instructed on the sensitivity of the area. LAUSD shall provide results of the recommended protective measures to document compliance with applicable State and Federal laws pertaining to the protection of native birds.</p> <ul style="list-style-type: none">• If the qualified biologist determines that a narrower buffer between the project activities and observed active nests is warranted, a written explanation as to why (e.g., species-specific information; ambient conditions and birds' habituation to them; and the terrain, vegetation, and birds' lines of sight between the project activities and the nest and foraging areas) shall be submitted to LAUSD OEHS project manager. Construction contractors can then reduce the demarcated buffer.• No construction shall occur within the fenced next zone until the young have fledged, are no longer being fed by the parents, have left the nest, and will no longer be impacted by the construction.• A biological monitor shall be present on site during all grubbing and clearing of vegetation to ensure that these activities remain outside the demarcated buffer and that the flagging, stakes, and/or construction fencing are maintained, and to minimize the likelihood that active nests are abandoned or fail due to project activities. The biological monitor shall send weekly monitoring reports to LAUSD OEHS project manager during the grubbing and clearing of vegetation, and shall notify LAUSD immediately if project activities damage avian nests.
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The information in this section is based partly on the "Tree Health and Impact Assessment" prepared by Gonzalez Goodale Architects, dated June 23, 2016. A complete copy of this report is included as Appendix B to this Initial Study.

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

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

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

No Impact. No locally designated natural communities or riparian habitats exist on the school campus. The school is not within an adopted habitat conservation plan, natural community conservation plan, or similar plan. The school is neither within nor proximate to any significant ecological area, land trust, or conservation plan.⁵⁰ No impact would occur and no further analysis is required.

⁵⁰ Los Angeles County Department of Regional Planning, Significant Ecological Area Update Study 2000. Figure 1 Significant Ecological Areas Update Study 200 Existing Boundaries. <http://planning.lacounty.gov/sea/faqs>.

4. Environmental Checklist and Analysis

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

No Impact. The school campus is fully developed, and there are no protected wetlands onsite. The Project would be confined to the school campus and would not have the potential to impact any offsite protected wetland areas. No impact would occur and no further analysis 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 campus is developed with buildings, asphalt, and concrete surfaces as well as turf playfields and other landscaped areas. The school campus does not feature any natural native habitat or wildlife corridors and is not available for overland wildlife movement. However, 333 trees of various species, sizes, and maturity are spread throughout the school campus and may provide nesting sites for resident or migratory birds. Approximately 71 trees would be removed as part of the Project; 6 for health or structural reasons and 65 because of conflicts with construction areas. Additionally, Project construction near vegetation and structures may result in disturbances to birds during nesting season (February 1 through August 31 and as early as January 1 for some raptors).

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

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

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

Less Than Significant Impact. The school has 333 trees of various species, sizes, and maturity that are spread throughout the school campus. In total, 71 are recommended for removal based on the Project. These include 65 trees that likely require removal for demolition and construction activities and 6 trees that are recommended for removal due to poor health and/or structure. Approximately 67 trees are considered “neutral”. These trees appear healthy enough to survive low to moderate construction impacts. However, some trees may need root pruning to achieve desired grade. Installation of pavers and grading may require excavation and compaction of subgrade that would significantly impact tree roots. These impacts may increase the number of “neutral” trees to be removed. The remaining 193 trees are not anticipated to be affected.

4. Environmental Checklist and Analysis

According to the City of Los Angeles Protected Tree Ordinance No. 177404, any of the following Southern California native tree species, measuring at least 4 inches in cumulative diameter at 4.5 feet above grade are protected:

- Any tree of the oak genus indigenous to California but excluding the scrub oak (*Quercus dumosa*)
- Southern California black walnut (*Juglans californica* var. *californica*)
- Western sycamore (*Platanus racemosa*)
- California Bay (*Umbellularia californica*)

Two onsite trees are protected under this ordinance, a coast live oak (*Quercus agrifolia*) and an Oregon white oak (*Quercus garryana*). The coast live oak is located on the northern edge of the school campus adjacent to Wicks Street. The Oregon white oak is located directly adjacent to Building 59's eastern wall. As shown in Figure 7, Building 59 is a classroom building that is proposed to remain and be repainted. Therefore, removal of these protected trees is not necessary for implementation of the Project. As the Project would comply with the City's protected tree ordinance, impacts would be less than significant and no further analysis 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 school is not within an adopted habitat conservation plan, natural community conservation plan, or similar plan.⁵¹ No impact would occur and no further analysis is required.

⁵¹ California Department of Fish and Wildlife. Accessed July 13, 2017.
<https://www.wildlife.ca.gov/Conservation/Planning/NCCP/Plans>.

4. Environmental Checklist and Analysis

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

Explanation:

LAUSD adopted Standard Conditions of Approval (SCs) that apply uniformly to all projects proposed by the District. Applicable SCs would minimize Project-related cultural resource impacts and are shown in the table below.

LAUSD Standard Conditions of Approval	
SC-CUL-5	LAUSD, consistent with Education Code Section 17540, shall offer to sell any useful features of the school building (e.g., the school bell, chalkboards, lockers) that do not contain hazardous materials for use or display, if features are not retained by LAUSD for reuse or display.
SC-CUL-6	LAUSD, consistent with Education Code Section 17540 and 17545, shall preserve, reuse, display, and/or offer for sale any remaining functional and defining features and building materials from the buildings. These materials could include items such as the school bell, chalkboards, lockers, plaques, doors, windows, siding, stones, lighting, doorknobs, hinges, cabinets, and appliances, among others as identified and listed in a preservation plan for the campus (these items may include items that are relevant to the campus community but are not character-defining features). They shall be made available to other agencies, other schools, and the public for sale and reuse, if features are not retained by LAUSD for reuse or display.
SC-CUL-7	LAUSD shall retain a qualified archaeologist to be available on-call. The qualified archaeologist shall meet the Secretary of the Interior's Professional Qualifications Standards (48 Federal Register 44738-39).
SC-CUL-8	The contractor shall halt construction activities in the immediate area and notify the LAUSD. LAUSD shall retain a qualified archeologist to make an immediate evaluation of significance and appropriate treatment of the resource. To complete this assessment, the qualified archeologist will be afforded the necessary time to recover, analyze, and curate the find. The qualified archeologist shall recommend the extent of archeological monitoring necessary to ensure the protection of any other resources that may be in the area. Construction activities may continue on other parts of the building site while evaluation and treatment of historical or unique archaeological resources takes place.
SC-CUL-9	LAUSD shall implement an archaeological monitoring program for construction activities at a site prepared by a qualified archaeologist under the following conditions: (1) when a Phase I Site Investigation shows a strong possibility that unique archeological resources are buried on the site; and/or (2) when unique archaeological resources have been identified on a site, but LAUSD does not implement a Phase III Data Recovery/Mitigation Program because the resources can be recovered through the archaeological monitoring program.

4. Environmental Checklist and Analysis

SC-CUL-10	All work shall stop within a 30-foot radius of the discovery. Work shall not continue until the discovery has been evaluated by a qualified archaeologist. The qualified archaeologist shall assess the find(s) and, if it is determined to be of value, shall draft a monitoring program and oversee the remainder of the grading program. Should evidence of prehistoric or historic cultural resources be found the archaeologist shall monitor all ground-disturbing activities related to the proposed project. Any significant archaeological resources found shall be preserved as determined necessary by the archaeologist and offered to a local museum or repository willing to accept the resource. Any resulting reports shall also be forwarded to the South Central Coastal Information Center at the California State University, Fullerton.
SC-CUL-11	Cultural resources sensitivity training shall be conducted by a qualified archaeologist for all construction workers involved in moving soil or working near soil disturbance. This training shall review the types of archaeological resources that might be found, along with laws for the protection of resources.
SC-CUL-12	LAUSD shall determine whether it is feasible to prepare and implement a Phase III Data Recovery/Mitigation Program. A Phase III Data Recovery/Mitigation Program would be designed by a Qualified Archaeologist to recover a statistically valid sample of the archaeological remains and to document the site to a level where the impacts can be determined to be less than significant. All documentation shall be prepared in the standard format of the ARMR Guidelines, as prepared by the OHP. Once a Phase III Data Recovery/Mitigation Program is completed, an archaeological monitor shall be present on site to oversee the grading, demolition activities, and/or initial construction activities to ensure that construction proceeds in accordance with the adopted Phase III Data Recovery/Mitigation Program. The extent of the Phase III Data Recovery/Mitigation Program and the extent and duration of the archaeological monitoring program depend on site-specific factors.
SC-CUL-13	All work shall stop within a 30-foot radius of the discovery. Work shall not continue until the discovery has been evaluated by a qualified archaeologist and the local Native American representative has been contacted and consulted to assist in the accurate recordation and recovery of the resources.
SC-CUL-14	LAUSD shall have a paleontological monitor on-call during construction activities. This monitor shall provide the construction crew(s) with a brief summary of the sensitivity, the rationale behind the need for protection of these resources, and information on the initial identification of paleontological resources. If paleontological resources are uncovered during construction, the on-call paleontologist shall be notified and afforded the necessary time and funds to recover, analyze, and curate the find(s). Subsequently, the monitor shall remain on site for the duration of the ground disturbances to ensure the protection of any other resources that may be in the area.
SC-CUL-15	The paleontological monitor shall be on site for all ground altering activities and shall advise LAUSD as to necessary means of protecting potentially significant paleontological resources, including, but not limited to, possible cessation of construction activities in the immediate area of a find. If resources are identified during the monitoring program, the paleontologist shall be afforded the necessary time and funds to recover, analyze, and curate the find(s). Subsequently, the monitor shall remain on site for the duration of the ground disturbances to insure the protection of any other resources that may be in the area.

The information in this section is based partly on the systemwide Historic Resource Survey Report prepared for LAUSD by Sapphos Environmental, Inc., dated June 2014 and the Preliminary Historic Resource Evaluation Report for John H. Francis Polytechnic High School prepared by PCR Services Corporation, dated June 28, 2016. Complete copies of these reports are included as Appendices C-1 and C-2 to this Initial Study.

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

Less Than Significant. The existing Polytechnic HS campus was largely built between 1956 and 1957.

For the following reasons, the 2014 LAUSD Historic Resources Survey Report (see Appendix C-1 to this Initial Study) found that the Polytechnic HS campus is not eligible for listing in the National Register of Historic Places (NRHP) or the California Register of Historic Resources (CRHR):

4. Environmental Checklist and Analysis

- The campus plan and buildings have many of the typical character-defining features of postwar LAUSD schools. However, taken as a whole, the campus is a common but not outstanding exemplification of postwar LAUSD design ideas.
- Research did not show that this campus was the site of a significant event or representative of a significant pattern of development
- Research did not show that the campus was associated with a person of significance in the community, state, or nation.
- The campus and its buildings are not an outstanding or distinctive example of architectural design or the work of a master architect.⁵²

In August 2015, an evaluation by the City of Los Angeles Office of Historic Resources (aka SurveyLA) found that the campus was potentially eligible for federal, state, and local landmark listing as a historic district. However, this assessment was conducted from the public right-of-way and limited research was conducted.⁵³

The Historic Resource Evaluation Report (HRE) prepared for the school in June 2016 (see Appendix C-2 to this Initial Study) reaffirmed the finding of the 2014 Historic Resource Survey Report. The HRE included an extensive survey of existing resources onsite, including a pedestrian survey, site-specific research, analysis of relevant regulations, and evaluation of the site's structures based on state and federal criteria. Among other attributes, the HRE found that the campus does not appear "to be a distinctive or outstanding example of its type or style and does not appear to be a notable example of Austin, Field, and Fry's work."⁵⁴ While the campus was found to retain much of its original integrity (e.g., location, materials, workmanship, design, layout) and to accurately express the Postwar Modern architectural style, it is not considered unique, innovative, or influential when compared with the numerous other schools built in the region during the same period. For example, there are better examples of the "finger-and-cluster" plan within district boundaries. This is a hybrid school layout combining a central courtyard with classroom wings branching from it.

Although eligibility for NRHP and CRHR registers does not preclude a structure or place from being a historic resource, there is no evidence supporting the existing school campus from being an important historic resource either locally or regionally. LAUSD will implement SC-CUL-5 AND SC-CUL-6 which requires salvage of value before building demolition. Therefore, impacts to historic resources would be less than significant and no further analysis is required.

⁵² Sapphos Environmental, Inc. June 2014. *Historic Resources Survey Report*. Prepared for Los Angeles Unified School District. Office of Environmental Health and Safety

⁵³ PCR Services Corporation. 2016, June 28. Preliminary Historic Resource Evaluation Report (HRE) for John H. Francis Polytechnic High School.

⁵⁴ PCR Services Corporation. 2016, June 28. Preliminary Historic Resource Evaluation Report (HRE) for John H. Francis Polytechnic High School.

4. Environmental Checklist and Analysis

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

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

... ‘unique archaeological resources’ means an archaeological artifact, object, or site about which it can be clearly demonstrated that, without merely adding to the current body of knowledge, there is a high probability that it meets any of the following criteria:

- (1) Contains information needed to answer important scientific research questions and there is a demonstrable public interest in that information.
- (2) Has a special and particular quality such as being the oldest of its type or the best available example of its type.
- (3) Is directly associated with a scientifically recognized important prehistoric or historic event or person.

Soil on campus was previously disturbed by construction of existing and previous buildings. Therefore, Project construction would not encounter archaeological resources that may be buried in site soils so long as excavations for construction of the Project extend no deeper than excavations for previous construction onsite.

Site preparation for the Project would include removal of existing soils; however, no subterranean construction is anticipated. The lowest finished floor elevations of new structures are anticipated to be at about the existing grade. Therefore, excavations for construction are not expected to extend substantially deeper than excavations for previous construction on the sites of the proposed buildings. The new buildings would not conform to the exact existing building foundations; therefore, excavation may encounter native soils. Additionally, because of the age of the campus, earthwork activities may yield previously undiscovered buried archaeological resources left during construction of the school.

As part of the project and in compliance with SC-CUL-7 through SC-CUL-11 if historical or unique archaeological resources are discovered during construction activities, all work shall stop within a 30-foot radius of the discovery. LAUSD will retain a qualified archaeologist to make an evaluation of significance of the resource. If it is determined to be historical or a unique archaeological resource or if the discovery is not historical or unique but the archaeologist determines the possibility of further discoveries, a monitoring program will be prepared and implemented for the remainder of the earthwork activities.

As part of the archaeological monitoring program required under SC-CUL-9, scheduling details for participation by a Native American monitor, if required, would be included. If archaeological or Native American resources are discovered, SC-CUL-13 and SC-TCR-1 would be implemented for handling and recovery. Archaeological impacts would be less than significant and no further analysis is required.

4. Environmental Checklist and Analysis

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

Less Than Significant Impact. A paleontological resource is a natural resource characterized as faunal or floral fossilized remains, but may also include specimens of non-fossil material dating to any period preceding human occupation.

Los Angeles County is rich in paleontological sites. Fossils have been found mostly in sedimentary rock that has been uplifted, eroded, or otherwise exposed. Pleistocene epoch and older alluvium in Los Angeles County has yielded locally abundant and scientifically significant fossils and has moderate to high paleontological sensitivity. However, neither the school campus nor the surrounding area has been identified as having a high paleontological sensitivity.⁵⁵

The school campus is underlain by fill soils of up to 5.5 feet below ground surface. Fill soils encountered onsite consist of combinations of silty sand and sand with some gravel and are not uniformly compacted. Fill and natural silty sand is underlain by a combination of predominantly medium dense to very dense well-graded sand with gravel and cobbles and poorly graded sand.⁵⁶ Because the school campus has been highly disturbed and is largely covered by fill soils, discovery of paleontological resources during shallow excavation activities is unlikely. Additionally, neither the school nor the surrounding area has been identified as having a high paleontological sensitivity. In the unlikely event that unanticipated buried resources are discovered, LAUSD shall implement SC-CUL-14 and SC-CUL-15. As a result, impacts to paleontological resources would be less than significant and no further analysis is required.

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

Less Than Significant Impact. In the unlikely event that human remains are uncovered during Project demolition, grading, or excavation, Government Code Sections 27460 et seq. mandate that there shall be no further excavation or disturbance until the Los Angeles County Coroner has determined that the remains are not subject to the provisions of Section 27491 of the Government Code or any other related provisions of law concerning investigation of the circumstances, manner, and cause of death, and the required recommendations concerning the treatment and disposition of the human remains have been made to the person responsible for the excavation, or to his or her authorized representative, in the manner provided in Section 5097.98 of the PRC.

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

⁵⁵ City of Los Angeles Citywide General Plan Framework Final Environmental Impact Report. Certified August 8, 2001. Appendix C - Vertebrate Paleontological Resources.

http://cityplanning.lacity.org/HousingInitiatives/HousingElement/FrameworkEIR/GPF_DraftEIR/GPF_FEIR_DEIR2.15.pdf

⁵⁶ Amec Foster Wheeler. November 7, 2016. Geotechnical Investigation: Proposed School Modernization, Francis Polytechnic Senior High School, 12431 Roscoe Boulevard, Sun Valley, California

4. Environmental Checklist and Analysis

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

Explanation:

LAUSD adopted Standard Conditions of Approval (SCs) that apply uniformly to all projects proposed by the District. Applicable SCs would minimize Project-related geology and soils impacts and are shown in the table below.

LAUSD Standard Conditions of Approval	
SC-GEO-1*	Compliance with OEHS CEQA Specification Manual, Appendix G, Supplemental Geohazard Assessment Scope of Work. This document outlines the procedures and scope for LAUSD geohazard assessments.
SC-HWQ-1	Stormwater Technical Manual. This manual establishes design requirements and provides guidance for the cost-effective improvement 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) requirements, and the post-construction element of the NPDES program requirements.

4. Environmental Checklist and Analysis

SC-HWQ-2	<p>Compliance Checklist for Storm Water Requirements at Construction Sites.</p> <p>This checklist has requirements for compliance with the General Construction Activity Permit and is used by OEHS to evaluate permit compliance. Requirements listed include a SWPPP; BMPs for minimizing storm water pollution to be specified in a SWPPP; and monitoring storm water discharges to ensure that sedimentation of downstream waters remains within regulatory limits</p>
<p>*The District has already complied with this Project-related standard condition; see Appendix D of this Initial Study.</p>	

The information in this section is based partly on “Report of Geotechnical Investigation. Proposed School Modernization, Francis Polytechnic Senior High School, 12431 Roscoe Boulevard, Sun Valley, California,” prepared by Amec Foster Wheeler, November 7, 2016 (Attached as Appendix D).

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

Less Than Significant Impact. The Project would not expose people or structures to potential substantial hazards from surface rupture of a known fault. The Alquist-Priolo Earthquake Fault Zoning Act was passed in 1972 to mitigate the hazards of surface faulting and fault rupture on habitable buildings. Fault rupture generally occurs within 50 feet of an active fault line and is limited to the immediate area of the fault. Active earthquake faults are faults where surface rupture has occurred within the last 11,000 years. The site is not within or immediately adjacent to (i.e., within a few hundred feet) a currently established Alquist-Priolo Earthquake Fault Zone for surface fault rupture hazards. The closest active fault to the site with the potential for surface fault rupture is the Verdugo Fault Zone, located approximately 1.3 miles northeast of the site. The nearest Alquist-Priolo Earthquake Fault Zone, established for a portion of the San Fernando Fault Zone, is approximately 4.4 miles north-northeast of the site.⁵⁷ Based on a review of readily available geologic literature, there are no known active faults or geologically hazardous areas on or immediately adjacent to the site. Fault rupture impacts would be less than significant and no further analysis is required.

ii) Strong seismic ground shaking?

Less Than Significant Impact. The Project would not increase exposure of people or structures to earthquake impacts. Southern California is a seismically active region. Impacts from ground shaking could occur many miles from an earthquake epicenter. The potential severity of ground shaking depends on many factors, including the distance from the originating fault, the earthquake magnitude, and the nature of the earth materials beneath a given site. There are several known faults in the Los Angeles region. The closest historically active surface fault is the Verdugo Fault Zone, about 1.3 miles to the northeast. Other nearby active faults are the San Fernando Fault Zone, the Santa Susana Fault, the Sierra

⁵⁷ Amec Foster Wheeler. November 7, 2016. Geotechnical Investigation: Proposed School Modernization, Francis Polytechnic Senior High School, 12431 Roscoe Boulevard, Sun Valley, California.

4. Environmental Checklist and Analysis

Madre Fault Zone and the San Gabriel Fault Zone located 4.4 miles north-northeast, 6.9 miles north, 7.3 miles east-northeast, and 8.5 miles north-northeast of the site, respectively. Because of the proximity to known faults, and because the entire southern California region is considered seismically active, there is a potential for people and structures to experience strong ground shaking in the future from local and regional faults.

The proposed new school buildings would be designed in accordance with the California Building Code, the California Geological Survey “Guidelines for Evaluating and Mitigating Seismic Hazards in California,”⁵⁸ and “Checklist for the Review of Geologic/Seismic Reports for California Schools, Hospitals, and Essential Services Buildings.”⁵⁹ The Project also requires review from the DSA for compliance with design and construction and accessibility standards and codes, including seismic requirements. LAUSD, with oversight from DSA, would comply with these requirements in the design and construction of the new school buildings. Seismic ground shaking impacts would be less than significant and no further analysis is required.

iii) Seismic-related ground failure, including liquefaction?

Less Than Significant Impact. Liquefaction refers to loose, saturated sand or gravel deposits that lose their load-supporting capability when subjected to intense shaking. Liquefaction potential varies based upon three main contributing factors: 1) cohesionless, granular soils having relatively low densities (usually of Holocene age);⁶⁰ 2) shallow groundwater (generally less than 50 feet); and 3) moderate to high seismic ground shaking. According to the County of Los Angeles 2014 Draft Seismic Safety Element,⁶¹ the City of Los Angeles (2015),⁶² and the California Geological Survey,⁶³ the site is not within an area identified as having a potential for liquefaction.

Based on groundwater level measurements in nearby wells, groundwater has historically been at a depth greater than 100 feet bgs. Therefore, the potential for liquefaction and the associated ground deformation beneath the site is considered to be low. Project development would not subject people or structures to substantial hazards arising from liquefaction, and impacts would be less than significant. No further analysis is required.

iv) Landslides?

No Impact. Landsliding is a type of erosion in which masses of earth and rock move down slope as a single unit. Susceptibility of slopes to landslides and other forms of slope failure depend on several factors, which are usually present in combination and include steep slopes, condition of rock and soil

⁵⁸ California Geological Survey “Guidelines for Evaluating and Mitigating Seismic Hazards in California,” published in 1997 by the California Department of Mines and Geology as Special Publication 117 (SP117), and revised and readopted September 11, 2008, and published by the California Department of Conservation, California Geological Survey (formerly known as DMG).

⁵⁹ California Geological Survey. October 2013.

http://www.conservation.ca.gov/cgs/information/publications/cgs_notes/note_48/Documents/Note_48.pdf

⁶⁰ The Holocene epoch began 12,000 to 11,500 years ago.

⁶¹ Los Angeles County. <http://planning.lacounty.gov/generalplan/draft2014>

⁶² Los Angeles Department of City Planning. General Plan. Safety Element, adopted November 26, 1996.

⁶³ Geology maps by the California Division of Mines and Geology (CDMG, 1998—now California Geological Survey). Seismic Hazard Evaluation of the South Gate 7.5 minute Quadrangle, Los Angeles County, California, Open File Report 98-25.

4. Environmental Checklist and Analysis

materials, the presence of water, formational contacts, geologic shear zones, and seismic activity. The relatively flat-lying topography at the site precludes both stability problems and the potential for lurching (earth movement at right angles to a cliff or steep slope during ground shaking). According to the County of Los Angeles Seismic Safety Element (1990) and the City of Los Angeles Safety Element (1996), the site is not within an area identified as having a potential for slope instability. There are no known landslides near the site, nor is the site in the path of any known or potential landslides. Additionally, the site is not located within an area identified as having a potential for seismic slope instability. The Project would not expose people or the new school buildings to adverse effects from landslides.⁶⁴ No impact would occur and no further analysis is required.

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

Less Than Significant Impact.

Construction Phase.

The Project would not result in substantial soil erosion or loss of topsoil. The native topsoil was removed and/or compacted during development of the school campus; therefore, redevelopment of the school campus would not result in the loss of topsoil.⁶⁵ Erosion is a normal and inevitable geologic process whereby earthen materials are loosened, worn away, decomposed or dissolved, and moved from one place to another. Precipitation, running water, waves, and wind are all agents of erosion. Ordinarily, erosion proceeds imperceptibly, but when the natural equilibrium of the environment is changed, the rate of erosion can be greatly accelerated. This can create aesthetic as well as engineering problems on undeveloped sites. Accelerated erosion in an urban area can cause damage by undermining structures; blocking storm drains; and depositing silt, sand, or mud in roads and tunnels. Eroded materials can eventually be deposited in local waters, where the carried silt remains suspended in the water for some time, constituting a pollutant and altering the normal balance of plant and animal life. Project-related construction activities would expose soil through excavation, grading, and trenching, and thus could cause erosion during heavy winds or storms. Construction projects of one acre or more are regulated under the National Pollutant Discharge Elimination System (NPDES) General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities (Order No. 2012-0006-DWQ) issued by the State Water Resources Control Board. Project applicants obtain coverage by developing and implementing a Stormwater Pollution Prevention Plan (SWPPP), estimating sediment risk from construction activities to receiving waters, and specifying best management practices (BMPs) that would be incorporated into the construction plan to minimize stormwater pollution. Categories of BMPs used in SWPPPs are described in Table 8. The school campus is 37.2 acres and the project would occur on approximately 15 acres; thus, construction would be subject to the Statewide Construction General Permit and implementation of BMPs specified in the SWPPP. This is also required under LAUSD Standard Condition of Approval SC-HWQ-2. Construction-phase soil erosion impacts would be less than significant and no further analysis is required.

⁶⁴ Amec Foster Wheeler. November 7, 2016. Geotechnical Investigation: Proposed School Modernization, Francis Polytechnic Senior High School, 12431 Roscoe Boulevard, Sun Valley, California.

⁶⁵ Topsoil is the thin, rich layer of soil where most nutrients for plants are found and where most land-based biological activity takes place. The loss of topsoil through erosion is a major agricultural problem.

4. Environmental Checklist and Analysis

Table 8 Construction BMPs

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

Source: California Stormwater Quality Association (CASQA). 2003, January. Stormwater Best Management Practice Handbook: Construction.

Operational Phase

After completion of the Project, ground surfaces at the school campus would be either hardscape or maintained landscaping, and no large areas of exposed soil would be left to erode off the campus. The Project would incorporate SC-HWQ-1, which requires compliance with the Low Impact Development Standards Manual (LID Standards Manual) issued by the County of Los Angeles Department of Public Works (DPW) in February 2014.⁶⁶ The LID Standards Manual in turn is pursuant to the Municipal Stormwater Permit for coastal watersheds of Los Angeles County, Order No. R4-2012-0175, issued by the Los Angeles Regional Water Quality Control Board in 2012.

LID employs principles such as preserving and recreating natural landscape features, minimizing effective imperviousness to create functional and appealing site drainage that treat stormwater as a resource rather than a waste product. There are many practices that have been used to adhere to these principles, such as bioretention facilities, rain gardens, vegetated rooftops, rain barrels, and permeable pavements. By implementing LID principles and practices, water can be managed in a way that reduces the impact of built areas and promotes the natural movement of water within an ecosystem or watershed. Applied on a broad

⁶⁶ LAUSD Standard Condition of Approval SC-HWQ-1 references the Standard Urban Stormwater Mitigation Plan (SUSMP) Manual issued by the County of Los Angeles Department of Public Works (DPW); the SUSMP Manual was superseded by the Low Impact Development Standards Manual (LID Standards Manual) issued by DPW in February 2014 available at http://www.lastormwater.org/wp-content/files_mf/lidmanualfinal.pdf.

4. Environmental Checklist and Analysis

scale, LID can maintain or restore a watershed's hydrologic and ecological functions.⁶⁷ LAUSD would comply with existing regulations and aSC-HWQ-1. Operational phase soil erosion impacts would be less than significant and no further analysis 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. Hazards arising from liquefaction and landslides would be less than significant, as discussed above in Sections VIa.(v) and (vi).

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

Subsidence. The major cause of ground subsidence is withdrawal of groundwater. The Project would not withdraw groundwater. Soils that are particularly subject to subsidence include those with high silt or clay content. The school is not in an area of known ground subsidence. No large-scale extraction of groundwater, gas, oil, or geothermal energy is occurring or planned at the site or in the general site vicinity. There appears to be little or no potential for ground subsidence due to withdrawal of fluids or gases at the site.⁶⁸ Project implementation would not pose substantial hazards to people or structures due to ground subsidence, and impacts would be less than significant. No further analysis is required.

Seismically Induced Settlement. Seismically induced settlement occurs in dry sands, in contrast to liquefaction which occurs in saturated sand or gravel, and is often caused by loose to medium-dense granular soils densified during ground shaking. Seismically-induced settlement is estimated to be on the order of ½ inch or less beneath the site in the event of the maximum considered earthquake. Differential seismically-induced settlement is estimated to be on the order of ¼ inch or less. The geotechnical investigation report includes recommendations for proper engineering design and construction in conformance with current building codes and engineering practices to minimize hazards to people and structures arising from seismically induced settlement.⁶⁹ Project development would not pose substantial hazards to people or structures arising from seismically induced settlement, impacts would be less than significant, and no further analysis is required.

Collapsible Soils. Collapsible soils are typically geologically young, unconsolidated sediments of low density that may compress under the weight of structures. Records documenting the placement and compaction of the existing fill soils encountered within the Project area are not available; therefore, the existing fill soils are not considered suitable for support of new structures on conventional spread/continuous footings. If the existing fill soils are excavated and replaced as properly compacted fill soils, the planned structures may be

⁶⁷ US Environmental Protection Agency. 2016, December 14. Urban Runoff: Low Impact Development. <https://www.epa.gov/nps/urban-runoff-low-impact-development>.

⁶⁸ Amec Foster Wheeler. November 7, 2016. Geotechnical Investigation: Proposed School Modernization, Francis Polytechnic Senior High School, 12431 Roscoe Boulevard, Sun Valley, California.

⁶⁹ Amec Foster Wheeler. November 7, 2016. Geotechnical Investigation: Proposed School Modernization, Francis Polytechnic Senior High School, 12431 Roscoe Boulevard, Sun Valley, California.

4. Environmental Checklist and Analysis

supported on conventional spread/continuous footings established on properly compacted fill soils and/or undisturbed natural soils and the floor slabs may be supported on grade.⁷⁰ As part of the DSA review process, LAUSD is required to show how the Project complies with a final engineering-level geotechnical report. This report includes, but is not limited to: identification of building setbacks, site preparation, specific locations and methods for fill placement, temporary shoring, groundwater seismic design features, excavation stability, foundations, soil stabilization, establishment of any deep foundations, concrete slabs and pavements, surface drainage, cement type and corrosion measures, erosion control, shoring and internal bracing, and plan review.

The Project design and development would incorporate all recommended measures outlined in the final engineering-level geotechnical report to ensure that safety is not compromised as required by existing regulations. Compliance with recommendations of the geotechnical investigation would minimize hazards from collapsible soils, impacts would be less than significant, and no further analysis is required.

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

Less Than Significant Impact. Expansive soils possess clay particles that react to moisture changes by shrinking when dry or swelling when wet. These soils have the potential to crack building foundations and, in some cases, structurally distress the buildings themselves. Minor to severe damage to overlying structures is possible. The site soils are considered non-expansive, and any required import material should consist of relatively non-expansive soils with an expansion index of less than 35.⁷¹ The Project would not expose people or the new school buildings to significant adverse effects associated with expansive soils. Impacts would be less than significant and no further analysis is required.

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

No Impact. The existing school does not use septic tanks or other alternative wastewater disposal systems and the proposed Project would not result in the use of septic tanks or other alternative waste water disposal systems. No impact would occur and no further analysis is required.

⁷⁰ Amec Foster Wheeler. November 7, 2016. Geotechnical Investigation: Proposed School Modernization, Francis Polytechnic Senior High School, 12431 Roscoe Boulevard, Sun Valley, California.

⁷¹ Amec Foster Wheeler. November 7, 2016. Geotechnical Investigation: Proposed School Modernization, Francis Polytechnic Senior High School, 12431 Roscoe Boulevard, Sun Valley, California.

4. Environmental Checklist and Analysis

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
VII. GREENHOUSE GAS EMISSIONS. Would the project:				
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<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:

LAUSD adopted Standard Conditions of Approval (SCs) that apply uniformly to all projects proposed by the District. Applicable SCs would minimize Project-related GHG impacts and are shown in the table below.

LAUSD Standard Conditions of Approval	
SC-USS-1	<p>School Design Guide.</p> <p>Construction and demolition waste shall be recycled to the maximum extent feasible. LAUSD has established a minimum non-hazardous construction and demolition debris recycling requirement of 75% by weight as defined in Specification 01340, Construction & Demolition Waste Management.</p> <p>Guide Specifications 2004 - Section 01340, Construction & Demolition Waste Management.</p> <p>This section of the LAUSD Specifications includes procedures for preparation and implementation, including reporting and documentation, of a Waste Management Plan for reusing, recycling, salvage or disposal of non-hazardous waste materials generated during demolition and/or new construction (Construction & Demolition (C&D) Waste), to foster material recovery and re-use and to minimize disposal in landfills. Requires the collection and separation of all C&D waste materials generated on-site, reuse or recycling on-site, transportation to approved recyclers or reuse organizations, or transportation to legally designated landfills, for the purpose of recycling salvaging and/or reusing a minimum of 75% of the C&D waste generated.</p>
SC-GHG-1	During school operation, LAUSD shall perform regular preventative maintenance on pumps, valves, piping, and tanks to minimize water loss.
SC-GHG-2	LAUSD shall utilize automatic sprinklers set to irrigate landscaping during the early morning hours to reduce water loss from evaporation.
SC-GHG-3	LAUSD shall reset automatic sprinkler timers to water less during cooler months and rainy season.
SC-GHG-4	LAUSD shall develop a water budget for landscape (both non-recreational and recreational) and ornamental water use to conform to the local water efficient landscape ordinance. If no local ordinance is applicable, then use the landscape and ornamental budget outlined by the California Department of Water Resources.
SC-GHG-5	LAUSD shall ensure that the time dependent valued energy of the proposed project design is at least 10 percent, with a goal of 20 percent less than a standard design that is in minimum compliance with the California Title 24, Part 6 energy efficiency standards that are in force at the time the project is submitted to the Division of the State Architect.

Note: Text in *italics* shows specific requirement identified in the criteria or condition.

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

The Intergovernmental Panel on Climate Change (IPCC) has identified four major greenhouse gases (GHGs)—water vapor, carbon dioxide (CO₂), methane (CH₄), and ozone (O₃)—that are the likely cause of an increase in global average temperatures observed within the 20th and 21st centuries. The primary source

4. Environmental Checklist and Analysis

of these GHGs is fossil fuel use. Other GHGs identified by the IPCC that contribute to global warming to a lesser extent are nitrous oxide (N₂O), sulfur hexafluoride (SF₆), hydro fluorocarbons, perfluorocarbons, and chlorofluorocarbons.⁷² This section analyzes the Project's contribution to global climate change impacts in California through an analysis of Project-related GHG emissions. Information on manufacture of cement, steel, and other "life cycle" emissions that would occur as a result of the Project are not applicable and are not included in the analysis.⁷³ Black carbon emissions are not included in the GHG analysis because CARB does not include this pollutant in the state's AB 32 inventory and treats this short-lived climate pollutant separately.^{74,75}

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

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

A typical school project could generate GHG emissions from construction activities, energy use (directly through fuel consumed for building heating), area sources (e.g., consumer products, coatings), mobile sources (e.g., vehicle trips associated with the new students), water usage, and solid waste generation. However, similar to the operation-phase criteria air pollutants as discussed in Section III(b) of this Initial Study, it is anticipated that the net change in operation-phase GHG emissions associated with the Project would be nominal due to the same number of students occupying existing buildings, and the new buildings being more energy efficient. The new buildings would be designed and constructed to comply with or exceed Title 24 Building Energy Efficiency Standards as outlined in CHPS EE 1.0, EE 2.0, EE 3.0, EE 5.0, and SC-GHG-5. Consistent with CHPS OM 3.0, the school will track its energy use over time to analyze energy performance of the facility. Also, as outlined in CHPS WE 1.0, WE 2.0, WE 3.0, and SC-GHG-1, SC-GHG-2, SC-GHG-3, SC-GHG-4, the Project would be designed to reduce potable water use, wastewater generation, and outdoor water use. Thus, for the purpose of this analysis, only quantified construction-related GHG emissions are provided. Table 9 provides both the total and amortized Project-related construction emissions. The amortized emission rate is based on total construction emissions amortized over 30 years per SCAQMD methodology.⁷⁶ As shown in the table, amortized construction emissions would be substantially below the

⁷² Water vapor (H₂O) is the strongest GHG and the most variable in its phases (vapor, cloud droplets, ice crystals). However, water vapor is not considered a pollutant, but part of the feedback loop rather than a primary cause of change.

⁷³ Life cycle emissions include indirect emissions associated with materials manufacture. However, these indirect emissions involve numerous parties, each of which is responsible for GHG emissions of their particular activity. See Appendix A for further details regarding "life cycle" emissions.

⁷⁴ Particulate matter emissions, which include black carbon, are analyzed in Section 3.2, *Air Quality*. Black carbon emissions have sharply declined due to efforts to reduce on-road and off-road vehicle emissions, especially diesel particulate matter. The State's existing air quality policies will virtually eliminate black carbon emissions from on-road diesel engines within 10 years.

⁷⁵ California Air Resources Board (CARB). 2017b, March 14. Final Proposed Short-Lived Climate Pollutant Reduction Strategy. <https://www.arb.ca.gov/cc/shortlived/shortlived.htm>.

⁷⁶ South Coast Air Quality Management District, 2008. Draft Guidance Document – Interim CEQA Greenhouse Gas (GHG) Significance Threshold, [http://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-\(ghg\)-ceqa-significance-thresholds/year-2008-2009/ghg-meeting-6/ghg-meeting-6-guidance-document-discussion.pdf](http://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-(ghg)-ceqa-significance-thresholds/year-2008-2009/ghg-meeting-6/ghg-meeting-6-guidance-document-discussion.pdf).

4. Environmental Checklist and Analysis

proposed SCAQMD bright-line threshold of 3,000 MTCO_{2e}/year. Furthermore, implementation of SC-USS-1, which requires construction waste recycling, would contribute to further minimizing construction-related GHG emissions. The operation-phase GHG emissions would be nominal and would not cause an exceedance of the SCAQMD bright-line threshold. Therefore, the Project's cumulative contribution to GHG emissions is less than significant and no further analysis is required.

Table 9 Project-Related Construction GHG Emissions

Source	GHG MTons
Total Construction Emissions ¹	2,559 MTCO _{2e}
Amortized Construction Emissions ²	85 MTCO _{2e} /Yr
Proposed SCAQMD Bright-Line Threshold	3,000 MTCO _{2e} /Yr
Exceeds Bright-Line Threshold	No

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

Notes: MTons: metric tons; MTCO_{2e}: metric ton of carbon dioxide equivalent

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

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

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

Less Than Significant Impact. The California Air Resources Board's (CARB's) Scoping Plan is California's GHG reduction strategy to achieve the state's GHG emissions reduction target. In accordance with AB 32, CARB developed the 2008 Scoping Plan to outline the state's strategy to achieve 1990 level emissions by year 2020. The CARB Scoping Plan is applicable to state agencies and is not directly applicable to cities/counties and individual projects. Nonetheless, the Scoping Plan has been the primary tool that is used to develop performance-based and efficiency-based CEQA criteria and GHG reduction targets for climate action planning efforts. On January 20, 2017, CARB released the 2017 Climate Change Scoping Plan to address the new interim GHG emissions target under Senate Bill 32, which requires the state to reduce its greenhouse gas emissions 40 percent below 1990 levels by 2030.⁷⁷

Statewide strategies to reduce GHG emissions in the 2017 Climate Change Scoping Plan include implementing Senate Bill 350, which expands the Renewables Portfolio Standard to 50 percent by 2030 and doubles energy efficiency savings; expanding the Low Carbon Fuel Standard to 18 percent by 2030; implementing the Mobile Source Strategy to deploy zero-electric vehicle buses and trucks; implementation of the Sustainable Freight Action Plan; implementation of the Short-Lived Climate Pollutant Reduction Strategy, which reduces methane and hydrofluorocarbons 40 percent below 2013 levels by 2030 and black carbon emissions 50 percent below 2013 levels by 2030; continuing to implement Senate Bill 375; creation of a post-2020 Cap-and-Trade Program; establishing a new regulation to reduce GHG emissions from the refinery

⁷⁷ California Air Resources Board. 2017, January 20. The 2017 Climate Change Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target. https://www.arb.ca.gov/cc/scopingplan/2030sp_pp_final.pdf.

4. Environmental Checklist and Analysis

sector by 20 percent; and development of an Integrated Natural and Working Lands Action Plan to secure California's land base as a net carbon sink.⁷⁸

New buildings are required to comply with the 2016 Building Energy Efficiency Standards and 2016 California Green Building Standards Code (CALGreen). Additionally, the new school building would be designed and constructed to meet the CHPS criteria and LAUSD Standard Conditions of Approval. With implementation of these regulations and standards, the Project's GHG emissions would exceed the reductions that would be achieved through statewide measures.

In addition to AB 32, the California legislature passed Senate Bill (SB) 375 to connect regional transportation planning to land use decisions made at a local level. SB 375 requires the metropolitan planning organizations to prepare a Sustainable Communities Strategy (SCS) in their regional transportation plans to achieve the per capita GHG reduction targets. For the SCAG region, the Regional Transportation Plan (RTP)/SCS was adopted in April 2016.⁷⁹ The Project would result in improvements to an existing school only and would not result in an increase to the number of students and would not result in generating additional vehicle trips. Therefore, the Project would not interfere with SCAG's ability to implement the regional strategies outlined in the RTP/SCS and the impacts would be less than significant. No further analysis is required.

⁷⁸ California Air Resources Board. 2017, January 20.

⁷⁹ Southern California Association of Governments (SCAG). 2016, April. The 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS): A Plan for Mobility, Accessibility, Sustainability, and a High Quality of Life. <http://scagrtpscs.net/Documents/2016/final/f2016RTPSCS.pdf>.

4. Environmental Checklist and Analysis

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
VIII. HAZARDS AND HAZARDOUS MATERIALS. Would the project:				
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	<input 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 checked="" type="checkbox"/>	<input type="checkbox"/>
e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f. For a project within the vicinity of a private airstrip, would the project result in a safety hazard for the people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
h. Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Explanation:

LAUSD adopted Standard Conditions of Approval (SCs) that apply uniformly to all projects proposed by the District. There are no hazards and hazardous materials SCs that would apply to this Project.

This section is based, in part, on the following technical studies:

- Phase I Environmental Site Assessment (ESA) for John H. Francis Polytechnic High School prepared by CES Group, dated September 22, 2016 (see Appendix E-1)
- Preliminary Environmental Assessment (PEA) Equivalent Investigation Report for John H. Francis Polytechnic High School prepared by CES Group dated May 9, 2017 (see Appendix E-2).

4. Environmental Checklist and Analysis

- 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.

Existing Hazardous Materials Present or Potentially Present on the Campus

The school has small quantities of potentially hazardous materials, including gasoline drums, diesel drums, compressed gas cylinders, and chemistry products. The following onsite items were reported in the 2012 Consolidated Contingency Plan prepared for the Project:⁸⁰

- Fuel Bunker/ Hazardous Storage Room:
 - Gasoline (55-gallon steel drums)
 - Contaminated gasoline (55-gallon steel drum)
 - Diesel (55-gallon drums)
- Round House/ Plant Managers Storage Area:
 - Water based waste paint (55 gallon drum)
 - Gym finish (5 gal plastic/non-metallic drum)
 - Fluorescent lamps, bulbs, metal halide lamps waste (0.5 cu yd box) – maintenance
 - Lead paint debris (solid waste) (55 gallon drum) – maintenance
 - Paint thinner, petroleum distillates (55 gallon drum) – maintenance
 - Waste aerosols (solid waste) (5 gallon drum) - maintenance
- Science Storage Area:
 - Waste oxidizing liquid (ammonium nitrate, lead nitrate) (5 gallon drum)
 - Waste nitric acid (5 gallon drum)
 - Waste corrosive liquid basic inorganic (sodium hydroxide) (16 gallon drum)
 - Waste corrosive liquid acid (HCl, sulfuric acid) (16 gallon drum)
 - Waste oil/used oil (30-gallon drum)

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

⁸⁰ CES Group. 2016, September 22. Phase I Environmental Site Assessment (ESA) for John H. Francis Polytechnic High School.

4. Environmental Checklist and Analysis

The amounts of hazardous materials that are handled at any one time are likewise small, reducing the potential consequences of an accident during transport, storage, or handling.

Hazardous materials are regulated by several agencies, including the California EPA Department of Toxic Substances Control, California Division of Occupational Safety and Health, and the City of Los Angeles Fire Department (LAFD). The requirements of these agencies would be incorporated into the design and operation of the Project. These requirements include providing for and maintaining appropriate storage areas for hazardous materials and installing or affixing appropriate warning signs and labels. Remediation and verification testing/monitoring would be required before CDE approval of the Project for state funding under California Education Code Sections 17210.1, 17213.1, and 17213.2.

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

Recognized Environmental Conditions

A recognized environmental condition (REC) is defined as the presence or likely presence of hazardous substances or petroleum products in, on, or at a property due to any release to the environment, under any conditions indicative of a release to the environment, or under conditions that pose a material threat of a future release to the environment.⁸¹

Onsite

Soil samples were collected from a total of 109 locations on the campus to test for chemicals of potential concern (COPC). These include lead, arsenic, organochlorine pesticides (OCPs), polychlorinated biphenyls (PCBs), total petroleum hydrocarbons (TPHs), and volatile organic compounds. Three samples were identified as having elevated concentrations above the screening level of 50 milligram per kilogram (mg/kg) for lead. Only one of these borings exceeded the LAUSD guideline for additional sampling of 80 mg/kg with a value of 176 mg/kg. The deeper sample in each of these boring locations was below screening levels. The following REC was identified on the school campus:⁸²

- **Arsenic.** Arsenic was not detected above the DTSC-adopted background arsenic concentration for Southern California of 12 mg/kg. None of the arsenic concentrations exceeded screening levels in soil samples tested. The proposed Project would not subject people to substantial hazards from arsenic, and impacts would be less than significant. No further analysis is required.

The following environmental issues do not qualify as RECs:⁸³

- **Polychlorinated Biphenyls.** PCBs were once used as coolants, insulating materials, and lubricants in electrical materials such as transformers. PCBs were used widely in caulking and elastic sealant materials,

⁸¹ ASTM International (ASTM). 2013. Standard E1527-13: Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process.

⁸² CES Group. May 9, 2017. PEA Equivalent Investigation Report for John H. Francis Polytechnic High School.

⁸³ CES Group. May 9, 2017. PEA Equivalent Investigation Report for John H. Francis Polytechnic High School.

4. Environmental Checklist and Analysis

particularly from 1950 through the 1970s, until PCBs were banned in 1979. PCBs can leach into the soil near exterior caulking in buildings and adjacent unpaved areas. PCBs were not detected in any of the samples that were analyzed.⁸⁴ . The proposed Project would not subject people to substantial hazards from PCBs, and impacts would be less than significant. No further analysis is required.

- **Asbestos.** Asbestos is the name of a group of silicate minerals that are heat resistant and thus were commonly used as insulation and fire retardant. Inhaling asbestos fibers has been shown to cause lung disease (asbestosis) and lung cancer (mesothelioma).⁸⁵ Beginning in the early 1970s, a series of bans on the use of certain asbestos-containing materials (ACMs) in construction were established by the EPA and the Consumer Product Safety Commission. Most US manufacturers voluntarily discontinued the use of asbestos in certain building products during the 1980s.⁸⁶

Considering the date of building construction (1956), it is possible that ACM may have been used at the school. Environmental records indicate that ACM has been removed from the school and is known to be present in buildings. During the site visit, all building materials appeared new and in good condition. Additional testing of the material may be necessary during renovation.

Prior to implementation of the proposed Project, buildings must be tested by LAUSD's Facilities Environmental Technical Unit (FETU) for asbestos.⁸⁷ Prior to demolition and renovation of permanent buildings and removal of portable buildings, asbestos would be removed, contained, and disposed of. Requirements for limiting asbestos emissions from building demolition and renovation activities are specified in SCAQMD Rule 1403 (Asbestos Emissions from Demolition/Renovation Activities). California Government Code Sections 1529 and 1532.1 provide for exposure limits, exposure monitoring, respiratory protection and good working practice by workers exposed to lead and ACMs. In addition, LAUSD Section 13614 (Abatement of Hazardous Materials) will be implemented for the removal of ACM and asbestos containing construction materials (ACCM), in compliance with applicable health and safety and hazardous materials regulations. The proposed modernization would not subject people to substantial hazards from ACM or ACCM, and impacts would be less than significant. No further analysis is required.

- **Lead-Based Paint.** Lead was formerly used as an ingredient in paint (before 1978) and as a gasoline additive; both of these uses have been banned. Lead is listed as a reproductive toxin and a cancer-causing substance; it also impairs the development of the nervous system and blood cells in children.⁸⁸ Lead-based paint is defined in Code of Federal Regulations Title 40 Part 745 as paint or other surface coatings that contain lead equal to or in excess of 1.0 milligram per square centimeter or 0.5 percent by weight. Those demolishing pre-1978 structures may presume the buildings contain lead-based paint without having an inspection.

⁸⁴ CES Group. May 9, 2017. PEA Equivalent Investigation Report for John H. Francis Polytechnic High School.

⁸⁵ Department of Toxic Substances Control (DTSC). 2017, March 16. Glossary of Environmental Terms. http://www.dtsc.ca.gov/InformationResources/Glossary_of_Environmental_Terms.cfm.

⁸⁶ US Environmental Protection Agency (USEPA). December 19, 2016. U.S. Federal Bans on Asbestos. <https://www.epa.gov/asbestos/us-federal-bans-asbestos>.

⁸⁷ FETU is responsible for hazardous material abatement and management and for State and Federal regulatory compliance.

⁸⁸ Department of Toxic Substances Control (DTSC). 2017, March 16. Glossary of Environmental Terms. http://www.dtsc.ca.gov/InformationResources/Glossary_of_Environmental_Terms.cfm.

4. Environmental Checklist and Analysis

It is likely that the paint on the buildings contains or formerly contained elevated lead concentrations. Due to its slow deterioration with time, the paint typically flakes off and accumulates in the adjoining soils. This can result in elevated lead concentrations in the soil adjoining older buildings. Note that the on-site buildings have been mostly surrounded by pavement since 1956. As such, the potential that the soils underlying this pavement have been impacted with lead is low. Soil samples were collected from 109 boring locations throughout the school campus. Lead was detected above 80 mg/kg in only one soil sample at a concentration of 176 mg/kg in a tree planter adjacent to a building.⁸⁹ The lead impacted soil at this location and one other planter location were removed in July 2017 as recommended by the PEA-E. Following soil removal, confirmation sampling verified that the extent of the impacted soil had been removed.⁹⁰ Additionally, due to the ages of the buildings to be demolished, all coated surfaces (paint, varnish, or glazed) are assumed to contain lead; therefore, they must be reviewed by LAUSD's FETU for lead-based paint prior to Project commencement.⁹¹

All lead-containing material abatement/removal work must comply with the EPA, US Occupational Safety and Health Administration, and SCAQMD regulations. Lead must be contained during demolition activities (California Health & Safety Code sections 17920.10 and 105255). Title 29 Code of Federal Regulations (CFR) Part 1926 establishes standards for occupational health and environmental controls for lead exposure. The standard also includes requirements addressing exposure assessment, methods of compliance, respiratory protection, protective clothing and equipment, hygiene facilities and practices, medical surveillance, medical removal protection, employee information and training, signs, recordkeeping, and observation or monitoring. In addition, LAUSD Specification Section 13282 (Lead Abatement and Lead Related Construction Work) and LAUSD Specification Section 13614 (Abatement of Hazardous Materials) will be implemented for the removal of lead-based paint and building materials, in compliance with applicable health and safety and hazardous materials regulations. The proposed Project would not subject people to substantial hazards from lead-based paint, and impacts would be less than significant. No further analysis is required.

- **Pesticides.** It is possible that persistent pesticides were formerly used within the campus, and may still be present in the soil surface. Due to the lack of orchards and row crops, which are relatively heavy users of pesticides, elevated pesticide concentrations (greater than regulatory levels) are not anticipated at the site.⁹²

Due to the ages of the buildings, organochlorine pesticides (OCP) may have been used in the buildings for termite control, and could also be present in the southeast corner of the site that was in residential use until the 1920s.⁹³ Arsenic is used as a pesticide, primarily in wood; but was also used in rat poisons, ant poisons, and weed killers.⁹⁴ Arsenic may have been historically used at the campus.

⁸⁹ CES Group. May 9, 2017. PEA Equivalent Investigation Report for John H. Francis Polytechnic High School.

⁹⁰ CES Group. September 7, 2017. Technical Memorandum for Limited Soil Removal at John H. Francis Polytechnic High School.

⁹¹ FETU is responsible for hazardous material abatement and management and for State and Federal regulatory compliance.

⁹² CES Group. May 9, 2017. PEA Equivalent Investigation Report for John H. Francis Polytechnic High School.

⁹³ Organochlorine termiticides previously used in the United States include lindane, aldrin, dieldrin, DDT (dichlorodiphenyltrichloroethane), chlordane, and heptachlor; none of those pesticides are still used as termiticides in the United States. Grace, et al. 1993. Persistence of Organochlorine Pesticides for Formosan Subterranean Termite (*Isoptera: Rhinotermitidae*)

4. Environmental Checklist and Analysis

The PEA-E included soil sampling and testing soils for OCPs. The concentrations of OCPs detected were below the EPA Region 9 regional screening levels.⁹⁵ LAUSD Section 13614 (Abatement of Hazardous Materials) will be implemented for the OCPs in compliance with applicable health and safety and hazardous materials regulations. The proposed Project would not subject people to substantial hazards from OCPs, and impacts would be less than significant. No further analysis is required.

- **Fuel Bunker.** Drums of gasoline, diesel, and contaminated gasoline were observed in a flammable materials storage room at the school. Indications of releases from these fuel containers were not evident at the time of the assessment. The proposed Project would not subject people to substantial hazards from the Fuel Bunker, and impacts would be less than significant. No further analysis is required.
- **Clarifiers.** A clarifier was observed adjacent to the chemistry room and another clarifier was observed in the ceramics classroom. The proposed Project would not subject people to substantial hazards from the clarifier, and impacts would be less than significant. No further analysis is required.
- The soil vapor analysis indicated that all sample results were below the California Human Health Screening Levels (CHHSL) value for shallow soil gas in residential scenarios except for the result from S70-10ft which was just slightly above the CHHSL value. A resample from this probe showed non-detectable results. Methane concentrations were below the DTSC recommended action level in that same resample and was not detected in the initial sample. The results of the model used by DTSC indicate that the cumulative risk for the school is considered acceptable for a residential use scenario.⁹⁶ Petroleum hydrocarbons and VOCs were detected in low concentrations. Soil vapor concentrations indicated low level VOCs but no methane. The proposed Project would not subject people to substantial hazards from the VOCs, and impacts would be less than significant. No further analysis is required.

Soil Import and Export

Any soil that is imported or exported must be chemically tested in accordance with specific written procedures as outlined in LAUSD Specifications, Section 01 4524, Environmental Import/Export Materials Testing.⁹⁷ This specification has the requirements for the sampling, testing, transporting, and certifying of imported fill materials or exported fill materials from school sites. The proposed Project would not subject people to substantial hazards, and impacts would be less than significant. No further analysis is required.

Demolition and Construction Activities

Demolition activities would be managed and conducted by the District's Facilities Environmental Technical Unit (FETU) in accordance with the District's standard practices. FETU would be responsible for ensuring the safe removal of potential asbestos containing materials and lead that may be encountered during

ntrol in Hawaii. In *Journal of Economic Entomology*, Vol. 86, No. 3.

<http://manoa.hawaii.edu/ctahr/termite/aboutcontact/grace/pdfs/068.pdf>.

⁹⁴ National Pesticide Information Center, Oregon State University. 2015, December 18. Arsenic. <http://npic.orst.edu/ingred/ptype/treatwood/arsenic.html>.

⁹⁵ CES Group. May 9, 2017. PEA Equivalent Investigation Report for John H. Francis Polytechnic High School.

⁹⁶ CES Group. May 9, 2017. PEA Equivalent Investigation Report for John H. Francis Polytechnic High School.

⁹⁷ LAUSD. 2011, October 1. LAUSD Asset Management, Guide Specifications: Division 01 General Requirements, Section 01 4524, Environmental Import/Export Materials Testing.

4. Environmental Checklist and Analysis

construction. LAUSD would ensure that all construction related activities are completed in accordance with all applicable federal, state, and local regulations, including but not limited to the EPA Guidance on Conducting Non-Time-Critical Removal Actions Under Comprehensive Environmental Response, Compensation, and Liability Act, National Oil and Hazardous Substances Pollution Contingency Plan, and all applicable LAUSD specifications, and standards. Construction would also comply with the applicable SCs, which include, but are not limited to, SC-USS-1, which requires that any construction waste will be recycled to the maximum extent feasible.¹⁷

Construction contractors are required to comply with LAUSD standard specifications for proper packaging, transportation, and disposal of any discovered hazardous materials before building construction starts. Specifically, construction contractors are required to comply with worker training, health and safety, hazardous material containment, and off-site transport, and disposal of contaminated soil. The proposed Project would not subject people or the environment to substantial hazards related to hazardous materials onsite or potentially onsite, and impacts would be less than significant. No further analysis is required.

Offsite

The former Sheldon-Arleta Landfill is located to the north of the school campus. This landfill operated from 1962 until 1974 in a former gravel pit used to mine construction materials prior to its conversion to a landfill. The former landfill had an active methane collection system in operation that was connected to a cogeneration plant which generated electrical power using the landfill methane gas. The former landfill had an extensive monitoring system in place that included vapor monitoring points along Wicks Street and an active positive pressure methane suppression system connected to wells near the school gymnasiums. As of 2012, the landfill gas collection system was placed underground to allow reclamation of the landfill for use as a recreational park. There is currently an extensive monitoring and mitigation system in place at the landfill and at Polytechnic HS. As part of the Project, the automatic gas detection and alarm system at Polytechnic HS would be deactivated and removed. Following implementation of the Project, the school would rely completely on a passively vented buffer zone under new buildings and pavements between existing buildings and the landfill. The landfill gas collection system is permitted by SCAQMD and overseen by the Los Angeles Bureau of Sanitation. City staff continues to monitor and tune the well field on a regular basis.⁹⁸ The site has a clay barrier on two sides to block gas migration, 36 gas evacuation wells in its middle and on the other two sides, and six flares to burn off the gas.⁹⁹ The former landfill is now being converted to the Sheldon-Arleta Park/Cesar Chavez Recreational Complex. Although public use of the facility has begun, grading and construction activities at the site are ongoing.

The decision for the proposed removal of the automatic detection and alarm system at Polytechnic HS is based on the following:

- Methane protection for the new buildings would be consistent with that provided at the nearby Byrd Middle School and Polytechnic Freshman Academy campuses;

⁹⁸ CES Group. 2016, September 22. Phase I Environmental Site Assessment (ESA) for John H. Francis Polytechnic High School.

⁹⁹ Los Angeles Times. 1985, April 5. Wells Drilled to Evacuate Methane Gas From School (article). http://articles.latimes.com/1985-04-05/local/me-27306_1_gas-evacuation

4. Environmental Checklist and Analysis

- The amount of methane gas generated at the landfill has dropped significantly since the landfill was closed, and continue to drop as biomass remaining in the landfill decomposes;
- No significant concentrations of methane have been measured at the Polytechnic campus during recent assessment work, or assessment work done for PEA circa 2000;
- The gas extraction system at the landfill was upgraded in circa 2006 to provide better control over landfill gas migration and post-closure extraction and, as mentioned above, monitoring operations continue to be actively managed by the Los Angeles Bureau of Sanitation;
- A contingency plan is in place that includes monitoring at points on school campuses should concentrations of methane gas measured wells at the landfill perimeter exceed specified thresholds;
- Historically, there have been no gas alarms at Polytechnic HS due to confirmed measurements of methane by the existing gas detection and alarm system; and
- An alarm system unnecessarily burdens school and District staff with responding to false alarms.

Due to the reasons identified above, the removal of the automatic gas detection and alarm system at Polytechnic HS and the reliance on a passively vented buffer zone under new buildings and pavements between existing buildings and the landfill would not pose a risk hazard to students or staff at the school.

Sites in the nearby vicinity of the school are listed on the following environmental databases:¹⁰⁰

- Lewis Continuation High School on the north boundary of the school campus is listed on the RCRA-LQG database as a LQG of over 1,000 kg of hazardous waste per month.
- A commercial parcel approximately 70 feet to the southwest at 12440 Roscoe Boulevard is a historical automobile shop located in a presumed downgradient location and at a lower elevation. No impacts are anticipated to the school campus.
- The gas station approximately 71 feet to the southwest at 12450 Roscoe Boulevard is listed as a closed site on the California Facility Inventory Database for Underground Storage Tanks (CA FID UST), EDR Historical Auto, Historical Cortese, Historical UST, LUST, Statewide Environmental Evaluation and Planning System (SWEEPS), and underground storage tank (UST) databases.¹⁰¹ Due to its location and elevation, no impacts to the school campus are anticipated.
- A DWP facility approximately 81 feet to the northwest at 8501 North Arleta Avenue is listed on multiple databases, including SWEEPS UST, CA FID UST, UST, LUST, California Hazardous Material Incident Report System (CHMIRS), Historical Cortese, and NPDES. The site is listed as a closed LUST site.

¹⁰⁰ CES Group. 2016, September 22. Phase I Environmental Site Assessment (ESA) for John H. Francis Polytechnic High School.

¹⁰¹ The database search disclosed in the Phase I ESA contains multiple database entries for the this same address.

4. Environmental Checklist and Analysis

- Byrd Middle School across Arleta Avenue is listed on the ECHO, FINDS, and RCRA-LQG databases. It is also listed as having DTSC oversight.
- The parcels at 12500–12522 West Roscoe Boulevard, approximately 181 feet to the southwest, are listed as a brownfields site listing with SWRQCB and is listed with EPA on their database for enforcement and compliance history information.
- A historical auto shop approximately 509 feet to the southeast at 12334 Burton Street is listed on the EDR database. No negative environmental impacts are anticipated based on the site's proximity to the school campus.
- Pam Trucking, approximately 752 feet to the northwest, is listed on the HWT database. No negative environmental impacts are anticipated based on the site's proximity to the school campus.
- Los Angeles Sheldon Arleta Library, approximately 752 feet to the northwest is listed on several databases, including ECHO, FINDS, RCRA-SQG. No negative environmental impacts are anticipated based on the site's proximity to the school campus.
- The aforementioned former Sheldon-Arleta landfill is listed on several databases, including NPDES, Solid Waste Information System (SWIS), Historical UST, SWEEPS UST, and CA FID UST. The site has a methane mitigation program and is currently under oversight.
- Hiro Photo Lab, approximately 826 feet to the northeast at 8365 Laurel Avenue is listed on several databases including ECHO, FINDS, and RCRA-SQG. No negative environmental impacts are anticipated based on the site's proximity to the school.

Based on the Phase I Environmental Site Assessment none of the off campus sites identified above pose a risk hazard to students or staff at the school. Impacts would be less than significant and no further analysis is required.

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

Less Than Significant Impact. The use, handling, storage, and disposal of hazardous materials in the course of Project construction and operation would not pose a substantial hazard to the public or the environment from reasonably foreseeable accidental release. Compliance with the previously discussed regulations is already standard practice at the school, including training school staff to safely contain and clean up hazardous materials spills; maintenance of hazardous materials spill containment and cleanup supplies onsite; implementing school evacuation procedures as needed; and contacting the appropriate hazardous materials emergency response agency immediately pursuant to requirements of regulatory agencies. Impacts from reasonably foreseeable upset and accident conditions would be less than significant and no further analysis is required.

4. Environmental Checklist and Analysis

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

Less Than Significant Impact. In addition to existing school, the school complex directly across Arleta Boulevard to the southwest is within 0.25 mile of the proposed construction site. This complex includes facilities used by Byrd Middle School, Polytechnic Freshman Academy, and North Hollywood Polytechnic Community Adult School.

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

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

- hazardous waste facilities subject to corrective action.
- hazardous waste discharges for which the State Water Resources Control Board (SWRCB) has issued certain types of orders.
- public drinking water wells containing detectable levels of organic contaminants.
- underground storage tanks with reported unauthorized releases.
- solid waste disposal facilities from which hazardous waste has migrated.

The Phase I ESA for the Project included a regulatory agency environmental database search. The school campus is not included on any list compiled pursuant to California Government Code Section 65962.5. The findings are discussed in further detail in Section VIII(a). Impacts would be less than significant and no further analysis is required.

4. Environmental Checklist and Analysis

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

No Impact. The nearest airport to the school is Whiteman Airport in Pacoima, a general aviation airport approximately two miles north of the campus. Bob Hope Airport, a commercial airport in the City of Burbank, is approximately 3 miles to the southeast.¹⁰² The high school is not within the airport influence area or the airport land use planning area of either airport.¹⁰³ The school comprehensive modernization would not result in a new use that would interfere with air traffic patterns, or increase traffic levels or change traffic locations such that it would result in a safety risk. No impact would occur and no further analysis is required.

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

No Impact. Barton Heliport is located adjacent to Whiteman Airport and is operated by the Air Operations Section of the Los Angeles County Fire Department.¹⁰⁴ This facility is approximately two miles from the school. New buildings on campus would be of similar height as the existing buildings and would not create a safety hazard. No impact would occur and no further analysis is required.

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

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

The City of Los Angeles also implements the City of Los Angeles Local Hazard Mitigation Plan, which was last updated in 2011. A comprehensive 2017 update to the plan is currently in draft form and has been submitted to the State of California Governor's Office of Emergency Services for review.¹⁰⁵

Emergency preparedness and response planning and coordination would be coordinated through LAUSD's Office of Emergency Services. The existing school currently has an emergency school evacuation plan in compliance with District's "safe school plans." The proposed renovation and new construction would not interfere with any other existing emergency response plans or emergency evacuation plans. No emergency response impact would occur and no further analysis is required.

¹⁰² Caltrans. 2016, March. 2016 California Public Use Airports and Federal Airfields. http://dot.ca.gov/hq/planning/aeronaut/documents/maps/PublicUseAirports_MilitaryAirfieldsMap.pdf.

¹⁰³ Los Angeles County Department of Public Works. 2017, August. Los Angeles County Airports. <http://dpw.lacounty.gov/avi/airports/map.aspx?extent=-13182592.650342794,4063015.015811797,-13180758.161663902,4064543.7563775414>.

¹⁰⁴ Airnav.com. Airport Information. <http://www.airnav.com/airports/>.

¹⁰⁵ City of Los Angeles. 2017, August. About the Hazard Mitigation Plan. <http://emergency.lacity.org/about-hmp>

4. Environmental Checklist and Analysis

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

No Impact. The school campus is in an urban area, and there is no wildland susceptible to wildfire on or near the site. Although there is undeveloped land in the Branford Spreading Basins¹⁰⁶ approximately 600 feet to the west of the school campus, low grasses in these areas would not be expected to provide enough fuel to support a potential wildfire. Furthermore, the California Department of Forestry and Fire Prevention (CAL FIRE) does not classify the spreading basins as a Very High Fire Hazard Severity Zone. The nearest such zone is approximately 2.5 miles to the east in the foothills to the Verdugo Mountains.¹⁰⁷ Project development would not place people or structures at risk from wildfire. No impact would occur and no further analysis is required.

¹⁰⁶ Los Angeles County Department of Water Resources (DPW). Spreading Grounds Facilities (map). <http://www.ladpw.org/wrd/SpreadingGround/SpreadingGroundMap.pdf>

¹⁰⁷ California Department of Forestry and Fire Prevention (CAL FIRE). 2011, September. Very High Fire Hazard Severity Zones in LRA: Los Angeles. http://frap.fire.ca.gov/webdata/maps/los_angeles/LosAngelesCounty.pdf

4. Environmental Checklist and Analysis

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

Explanation:

LAUSD adopted Standard Conditions of Approval (SCs) that apply uniformly to all projects proposed by the District. Applicable SCs would minimize Project-related hydrology and water quality impacts and are shown in the table below.

4. Environmental Checklist and Analysis

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

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

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

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

The Project would be constructed in an area that is already developed and already producing nonpoint-source pollutants. Currently, stormwater is collected by engineered storm drains and directed toward Roscoe Boulevard, which empties into the Tujunga Wash and ultimately to the Los Angeles River, which flows south and discharges into the Pacific Ocean at Long Beach.¹⁰⁸

Construction Phase

Construction projects of one acre or more are regulated under the NPDES General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities (Order No. 2012-0006-DWQ) issued by the SWRCB. Project applicants obtain coverage by developing and implementing a SWPPP, estimating pollutants from construction activities to receiving waters, and specifying BMPs that would be incorporated into the construction plan to minimize stormwater pollution. The school campus is 37.2 acres; however, because of active school operation, less than 5 acres (contiguous) on campus would be disturbed at any one time. Project construction would be subject to the Statewide Construction General Permit and

¹⁰⁸ Los Angeles County Department of Public Works (DPW). Los Angeles County Storm Drain System (interactive map). <http://dpw.lacounty.gov/fcd/stormdrain/index.cfm>

4. Environmental Checklist and Analysis

implementation of BMPs specified in the SWPPP. This is also required under LAUSD Standard Condition of Approval SC-HWQ-2. Construction phase soil erosion impacts would be less than significant and no further analysis is required.

Operation Phase

After completion of the Project, ground surfaces at the school campus would be either hardscape or maintained landscaping, and no large areas of exposed soil would be left to erode off the campus. The Project would incorporate SC-HWQ-1, which requires compliance with the Low Impact Development Standards Manual (LID Standards Manual) issued by the County of Los Angeles Department of Public Works (DPW) in February 2014.¹⁰⁹ The LID Standards Manual in turn is pursuant to the Municipal Stormwater Permit for coastal watersheds of Los Angeles County, Order No. R4-2012-0175, issued by the Los Angeles Regional Water Quality Control Board in 2012.

The LID Standards Manual was developed as part of the municipal stormwater program to address stormwater pollution from new developments and redevelopment projects.¹¹⁰ LID stormwater management would be incorporated into the Project design. LID principles are described further in Section VI, *Geology and Soils*, of this Initial Study. LAUSD would comply with existing regulations and SC-HWQ-1. Operational phase soil erosion impacts would be less than significant and no further analysis is required.

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

Less Than Significant Impact. The school campus is over the San Fernando Groundwater Basin of the South Coast Hydrologic Region.¹¹¹ The City of Los Angeles Department of Water and Power (DWP) supplies water to the school campus and the surrounding community. Approximately 79.2 of DWP's local groundwater entitlements are for the San Fernando Groundwater Basin.¹¹² Based on groundwater level measurements in nearby wells, groundwater has historically been at a depth greater than 100 feet bgs. The Project does not include new groundwater wells that would extract groundwater from the aquifer. Construction and operation of the school improvements would not lower the groundwater table or deplete groundwater supplies. Furthermore, the 37.2-acre school does not provide intentional groundwater recharge and would continue to feature turf sports fields. Therefore, the Project would not interfere with groundwater recharge. Impacts would be less than significant and no further analysis is required.

¹⁰⁹ LAUSD Standard Condition of Approval SC-HWQ-1 references the Standard Urban Stormwater Mitigation Plan (SUSMP) Manual issued by the County of Los Angeles Department of Public Works (DPW); the SUSMP Manual was superseded by the Low Impact Development Standards Manual (LID Standards Manual) issued by DPW in February 2014 available at http://www.lastormwater.org/wp-content/files_mf/lidmanualfinal.pdf.

¹¹⁰ City of Los Angeles. LA Stormwater. Standard Urban Stormwater Mitigation Plan. <http://www.lastormwater.org/green-la/standard-urban-stormwater-mitigation-plan/>.

¹¹¹ Amec Foster Wheeler. November 7, 2016. Report of Geotechnical Investigation Proposed School Modernization. Francis Polytechnic Senior High School. 12431 Roscoe Boulevard, Sun Valley, California. Project 4953-16-1011.

¹¹² City of Los Angeles Department of Water and Power (DWP). 2016, June. 2015 Urban Water Management Plan. <file:///C:/Users/RPotter/Downloads/2015%20Urban%20Water%20Management%20Plan-LADWP.pdf>

4. Environmental Checklist and Analysis

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

Less Than Significant Impact. There are no streams or rivers on the school campus. The site drains into reinforced concrete pipes (RCPs) within the right-of-way of adjacent surface streets (i.e., Arleta Avenue, Peoria Street, Roscoe Boulevard, and Wicks Street) that are between 39 and 63 inches wide.¹¹³ These storm drains are part of a network of drains discharging into the Tujunga Wash—an earthen channel—about 0.4 miles west of the school campus—and later into the Los Angeles River. The Los Angeles River continues south before discharging into the Pacific Ocean at Long Beach. The Project would not change the drainage pattern of the school campus or its surroundings.

Construction Phase

During construction, erosion and siltation from the disturbed areas may occur. Construction-related activities that expose soils to rainfall/runoff and wind are primarily responsible for erosion. Construction activities would expose soil through excavation, grading, and trenching. Unless adequate erosion controls are installed and maintained during construction sediment may enter storm drains. The Project construction would be subject to the Statewide Construction General Permit and implementation of BMPs specified in the SWPPP and SC-HWQ-2 (Compliance Checklist for Storm Water Requirements at Construction Sites) that also requires control measures. These requirements include provisions for erosion and pollution control measures to ensure water quality in stormwater runoff. Impacts would be less than significant and no further analysis is required.

Operation Phase

Upon Project completion, drainage from the school would continue to be captured on campus or conveyed to the Tujunga Wash via the same storm drains as with existing conditions. The entire school campus would discharge less stormwater because of LID requirements. The County of Los Angeles has prepared the 2014 Low Impact Development Standards Manual to comply with the requirements of the NPDES Municipal Separate Storm Sewer System (MS4) Permit for stormwater and non-stormwater discharges from the MS4 within the coastal watersheds of Los Angeles County (CAS004001, Order No. R4- 2012-0175). LID employs principles such as preserving and recreating natural landscape features, minimizing effective imperviousness to create functional and appealing site drainage that treats stormwater as a resource rather than a waste product. There are many practices that have been used to adhere to these principles, such as bioretention facilities, rain gardens, vegetated rooftops, rain barrels, and permeable pavements. By implementing LID principles and practices, water can be managed in a way that reduces the impact of built areas and promotes the natural movement of water within an ecosystem or watershed by retaining stormwater onsite. Thus, Project development would not cause substantial erosion. Impacts would be less than significant and no further analysis is required.

¹¹³ Los Angeles County Department of Public Works (LACDPW). 2017, March 24. Los Angeles County Storm Drain System. <http://dpw.lacounty.gov/fcd/stormdrain/index.cfm>.

4. Environmental Checklist and Analysis

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

No Impact. The drainage pattern of the Project would be similar to existing conditions, as described above in item (c). Pursuant to LID standards, the proposed on-site drainage system would be expected to discharge a net decrease in runoff to municipal storm drains. Thus, Project development would not result in substantial flooding on- or off-site, and no impacts would occur. No further analysis is required.

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

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

- f) Otherwise substantially degrade water quality?**

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

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

No Impact. The Project would not develop housing. No impact would occur and no further analysis is required.

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

No Impact. The school campus is outside of 100-year flood zones mapped by the Federal Emergency Management Agency,¹¹⁴ and therefore the Project buildings would not impede or redirect flood flows. No impact would occur and no further analysis is required.

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

Less Than Significant Impact. The school campus is in the dam inundation zone for Hansen Dam and Sepulveda Dam, which is on Big Tujunga Creek approximately two miles northeast of the school campus.¹¹⁵

¹¹⁴ Federal Emergency Management Agency (FEMA). 2008, November 26. Countywide Flood Insurance Rate Map #06037C1310. Fhttps://msc.fema.gov/portal/search?AddressQuery=12431%20Roscoe%20Blvd%2C%20Sun%20Valley%2C%20CA%2091352#searchresultsanchor

¹¹⁵ Amec Foster Wheeler. November 7, 2016. Report of Geotechnical Investigation Proposed School Modernization. Francis Polytechnic Senior High School. 12431 Roscoe Boulevard, Sun Valley, California. Project 4953-16-1011.

4. Environmental Checklist and Analysis

However, this reservoir is continually monitored by various governmental agencies (such as the State of California Division of Safety of Dams and the U.S. Army Corps of Engineers) to guard against the threat of dam failure. Current design; construction practices; and ongoing programs of review, modification, or total reconstruction of existing dams are intended to ensure that all dams are capable of withstanding the maximum considered earthquake. Impacts would be less than significant and no further analysis is required.

j) Inundation by seiche, tsunami, or mudflow?

No Impact.

Seiche. A seiche is an oscillating surface wave in a restricted or enclosed body of water, generated by ground motion, usually during an earthquake. Seiches are of concern for water storage facilities, because inundation from a seiche can occur if the wave overflows a containment wall, such as the wall of a reservoir, water storage tank, dam, or other artificial body of water. The Branford Spreading Basins are located approximately 1,000 feet to the northwest of the school campus. They feature earthen basins that can hold approximately 137 acre-feet of water over 12 acres and an above-ground storage tank.¹¹⁶ However, the spreading grounds are constructed to allow for groundwater recharge and generally feature very little water under existing conditions. Project development would not directly or indirectly exacerbate flood hazards due to potential failure of nearby reservoirs.¹¹⁷ No impact would occur and no further analysis is required.

Tsunami. Tsunamis are a type of earthquake-induced flooding produced by large-scale sudden disturbances of the sea floor. Tsunami waves interact with the shallow sea floor when approaching a landmass, resulting in an increase in wave height and a destructive wave surge into low-lying coastal areas. The school campus is at an elevation of approximately 828 feet above sea level¹¹⁸ and is approximately 15 miles inland from the Pacific Ocean. Therefore, the campus is outside the tsunami hazard zone and would not be directly affected by a tsunami. No impact would occur and no further analysis is required.

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

¹¹⁶ Los Angeles County Department of Water Resources (DWR). Spreading Facility Information (website). Accessed August 2, 2017. <http://www.ladpw.org/wrd/SpreadingGround/information/facdept.cfm?facinit=12>

¹¹⁷ The scope of CEQA regarding analysis of existing hazards potentially affecting a project site was clarified by the California Supreme Court in 2015 (62 Cal.4th 369). Many effects of the environment on a project site are now excluded from CEQA. Whether a project would *exacerbate* an existing hazard – directly, indirectly, or cumulatively – remains within the purview of CEQA. Office of Planning and Research. 2016, October 21. Consideration of Significant Effects and Hazards in the CEQA Guidelines. https://www.opr.ca.gov/docs/Proposed_Amendments_to_Section_15126.2a_Regarding_Hazards_10212016.pdf.

¹¹⁸ Amec Foster Wheeler. November 7, 2016. Report of Geotechnical Investigation Proposed School Modernization. Francis Polytechnic Senior High School. 12431 Roscoe Boulevard, Sun Valley, California. Project 4953-16-1011.

4. Environmental Checklist and Analysis

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

Explanation:

LAUSD adopted Standard Conditions of Approval (SCs) that apply uniformly to all projects proposed by the District. There are no land use and planning SCs that would apply to this Project.

a) Physically divide an established community?

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

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

Less Than Significant Impact. The zoning for the school property is [Q]PF-1XL. PF (Public Facilities) is the designation for the use and development of publicly owned land, including public elementary and secondary schools. [Q] means additional restrictions on building design, landscape buffer, signs, etc.; '1' is Height District No. 1; and 'XL' is Extra Limited Height District where no building or structure shall exceed two stories, nor shall the highest point of the roof of any building or structure exceed 30 feet in height.¹¹⁹ While new buildings on the campus may exceed 30 feet in height, the California legislature granted school districts the power to exempt school property from local zoning requirements, provided the school district complies with the terms of Government Code Section 53094. As lead agency for the proposed Project, LAUSD will comply with Government Code Section 53094 to render the local City of Los Angeles Zoning

¹¹⁹ City of Los Angeles Municipal Code, Section 12.21.1. Height of Building or Structures.
[http://library.amlegal.com/nxt/gateway.dll/California/lapz/municipalcodechapteriplanningandzoningco/chapterigeneralprovisio nsandzoning/article2specificplanning-zoningcomprehen/sec12176m1limitedindustrialzone?f=templates\\$fn=default.htm\\$3.0\\$vid=amlegal:lapz_ca\\$anc](http://library.amlegal.com/nxt/gateway.dll/California/lapz/municipalcodechapteriplanningandzoningco/chapterigeneralprovisio nsandzoning/article2specificplanning-zoningcomprehen/sec12176m1limitedindustrialzone?f=templates$fn=default.htm$3.0$vid=amlegal:lapz_ca$anc).

4. Environmental Checklist and Analysis

Ordinance inapplicable to the proposed Project. Following a two-thirds vote of the Board of Education, LAUSD can exempt a school site from such local zoning requirements. Within 10 days of the action, the Board must provide the City of Los Angeles with notice of this action.

The City of Los Angeles General Plan Land Use designation for the school property is 'Public Facilities,' which allows public schools.¹²⁰ New construction on the school campus would not represent a change in land use and would not conflict with existing plans, policies, or regulations adopted for the purpose of avoiding or mitigating environmental effects. Impacts would be less than significant and no further analysis is required.

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

No Impact. The school campus is completely developed and located in an urbanized area. Habitat conservation plans and natural community conservation plans designate undeveloped lands with natural resources, including habitat for specific threatened and endangered species. For instance, Los Angeles County only has one area designated under a natural community conservation plan: 8,616 acres in Rancho Palos Verdes.¹²¹ By its nature as a fully developed school site in an urban environment, it is not in a habitat conservation plan or natural community conservation plan. No impact would occur and no further analysis is required.

¹²⁰ City of Los Angeles zoning. <http://zimas.lacity.org/>

¹²¹ Summary of Natural Community Conservation Plans (NCCPs). September 2016.
<https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=15329&inline>

4. Environmental Checklist and Analysis

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

Explanation:

LAUSD adopted Standard Conditions of Approval (SCs) that apply uniformly to all projects proposed by the District. There are no mineral resource SCs that would apply to this Project.

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

No Impact. The school campus is mapped Mineral Resource Zone 2 (MRZ-2) by the California Geological Survey (CGS), indicating that it is in an area where “adequate information indicates that significant mineral deposits are present, or where it judged that a high likelihood exists for their presence.” CGS maps also show that a permitted aggregate pit, Boulevard Pit, is located approximately 0.5 miles to the north of the school campus between Laurel Canyon Boulevard and San Fernando Road and that a former gravel pit was located approximately 700 feet to the northwest.¹²² The gravel pit has since been filled in with the construction of Sheldon Arleta Park. Other active mines in the general vicinity include the Sheldon and Calmat-Sun Valley pits, both approximately 1.75 miles to the northeast of the school campus.¹²³ There are no oil fields near the school campus. All gas and oil wells within five miles are either buried or plugged. The closest active gas and oil production wells are approximately seven miles to the northwest in the Aliso Canyon oil field.¹²⁴

Despite the presence of mineral resources in the vicinity of the school campus, the school campus is fully developed and is not available for mining. Therefore, development of the Project would not cause a loss of availability of a known mineral resource valuable to the region and the state, and no impact would occur. No further analysis is required.

¹²² California Geological Survey (CGS). 1994a. Generalized Mineral Land Classification Map of Los Angeles County: South Half. Open File Report 94-14, Plate 1B. ftp://ftp.consrv.ca.gov/pub/dmg/pubs/ofr/OFR_94-14/OFR_94-14_Plate1B.pdf.

¹²³ Office of Mine Reclamation (OMR). 2017, March 27. Mines Online. <http://maps.conservation.ca.gov/mol/index.html>.

¹²⁴ Division of Oil, Gas, and Geothermal Resources (DOGGR). 2017, March 27. DOGGR Well Finder. <http://www.conservation.ca.gov/dog/Pages/WellFinder.aspx>.

4. Environmental Checklist and Analysis

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 City of Los Angeles General Plan Conservation Element designates the site directly to the northwest of the school across Wicks Street as a surface mining district.¹²⁵ However, as described in Section 2.2 of this Initial Study, that site was used as the Sheldon-Arleta Landfill from 1962 to 1975 and was converted to Sheldon Arleta Park in 2007. Therefore, the site is not available for mineral resource recovery or extraction under existing conditions or in the future. Furthermore, the Project is limited to the existing school campus. Therefore, development of the Project would not cause a loss of availability of a mining site, and no impact would occur. No further analysis is required.

¹²⁵ City of Los Angeles. 2001. City of Los Angeles Conservation Element. <https://planning.lacity.org/cwd/gnlpln/consvelt.pdf>.

4. Environmental Checklist and Analysis

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

Explanation:

LAUSD adopted Standard Conditions of Approval (SCs) that apply uniformly to all projects proposed by the District. Applicable SCs would minimize Project-related noise impacts and are shown in the table below.

LAUSD Standard Conditions of Approval	
SC-N-1	LAUSD shall include features such as sound walls, building configuration, and other design features in order to attenuate exterior noise levels on a school campus to less than 70 dBA L ₁₀ or 67 dBA L _{eq} .
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 design to achieve interior classroom noise levels of less than 55 dBA L₁₀ or 45 dBA L_{eq} with maximum (unoccupied) reverberation times of 0.6 seconds. Noise reduction methods shall include, but are not limited to, sound walls, building and/or classroom insulation, HVAC modifications, double-paned windows, and other design features in order to achieve the noise standards.</p> <ul style="list-style-type: none"> • The District should acknowledge the ANSI (American National Standards Institute) S12 standard as a District goal that may presently not be achievable in all cases. • Where economically feasible, new school design should achieve classroom acoustical quality consistent with the ANSI standard and in no event exceed the current CHPS (California High Performance Schools) standard of 45 dBA. • Where economically feasible, new HVAC (Heating, Ventilating, and Air Conditioning) installations should be designed to achieve the lowest possible noise level consistent with the ANSI standard. In no event should these installations exceed the current CHPS standard of 45 dBA. • To promote the development of lower noise emitting HVAC units, the District's purchase of new units should give preference to manufacturers producing the lowest noise level at the lowest cost. <p>Existing HVAC units operating in excess of 50 dBA should be modified.</p>

4. Environmental Checklist and Analysis

LAUSD Standard Conditions of Approval	
SC-N-5	LAUSD Facilities Division or its construction contractor shall consult and coordinate with the school principal or site administrator, and other nearby noise sensitive land uses prior to construction to schedule high noise or vibration producing activities to minimize disruption. Coordination between the school, nearby land uses and the construction contractor shall continue on an as-needed basis throughout the construction phase of the project to reduce school and other noise sensitive land use disruptions.
SC-N-6	LAUSD shall require the construction contractor to minimize blasting for all construction and demolition activities, where feasible. If demolition is necessary adjacent to residential uses or fragile structures, LAUSD shall require the construction contractor to avoid using impact tools. Alternatives that shall be considered include mechanical methods using hydraulic crushers or deconstruction techniques.
SC-N-7	For projects where pile driving activities are required within 150 feet of a structure, a detailed vibration assessment shall be provided by an acoustical engineer to analyze potential impacts related to vibration to nearby structures and to determine feasible mitigation measures to eliminate potential risk of architectural damage.
SC-N-8	<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 for work done within 25 feet of the historic building. • The construction contractor shall avoid use of vibratory rollers and packers adjacent to a historic building. • During demolition the construction contractor shall not phase any ground-impacting operations near a historic building to occur at the same time as any ground impacting operation associated with demolition and construction of a new building. • During demolition and construction, if any vibration levels cause cosmetic or structural damage to a historic building the District shall issue "stop-work" orders to the construction contractor immediately to prevent further damage. Work shall not restart until the building is stabilized and/or preventive measures to relieve further damage to the building are implemented.
SC-N-9	<p>LAUSD shall prepare a noise assessment.</p> <p>If site-specific review of a school construction project identifies potentially significant adverse construction noise impacts, then LAUSD shall implement all feasible measures to reduce below applicable noise ordinances. If exterior construction noise levels exceed local noise standards, policies, or ordinances at noise-sensitive receptors, LAUSD shall mandate that construction bid contracts include the measures identified in the noise assessment. Specific noise reduction measures include, but are not limited to, the following:</p> <p><u>Source Controls</u></p> <ul style="list-style-type: none"> • Time Constraints – prohibiting work during sensitive nighttime hours • Scheduling – performing noisy work during less sensitive time periods (on operating campus: delay the loudest noise generation until class instruction at the nearest classrooms has ended; residential: only between 7:00 AM and 7:00 PM) • Equipment Restrictions – restricting the type of equipment used • Noise Restrictions – specifying stringent noise limits • Substitute Methods – using quieter methods and/or equipment • Exhaust Mufflers – ensuring equipment have quality mufflers installed • Lubrication & Maintenance – well maintained equipment is quieter • Reduced Power Operation – use only necessary size and power • Limit Equipment On-Site – only have necessary equipment on-site • Noise Compliance Monitoring – technician on site to ensure compliance • Quieter Backup Alarms – manually-adjustable or ambient sensitive types <p><u>Path Controls</u></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

4. Environmental Checklist and Analysis

LAUSD Standard Conditions of Approval	
	<p><u>Receptor Controls</u></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 contractor and the District. In the event of noise complaints LAUSD shall monitor noise from the construction activity to ensure that construction noise does not exceed limits specified in the noise ordinance. • Temporary Relocation – in extreme, otherwise immitigable cases. Temporarily move residents or students to facilities away from the construction activity.

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

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

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

Less Than Significant Impact.

Mobile-Source Noise

The Project would not increase student capacity and therefore would not increase traffic-generated noise levels on local roadways. Traffic noise levels would remain the same as current conditions, and no mobile-source noise impact would occur. No further analysis is required.

Stationary-Source Noise

Stationary noise sources would include school buzzers or bells, landscaping equipment, outdoor activities, and heating, ventilation and air conditioning (HVAC) systems. Since the Project would not increase student capacity and the campus would retain approximately the same footprint, these stationary sources would be the same as the current conditions. For school buzzers/bells, and landscaping activities, there would be no changes after completion of the comprehensive modernization Project. These stationary sources would be the same as the current conditions in and around the school campus.

The Project would add new sources of stationary HVAC noise at the buildings, but these would be comparable or quieter than other, similar sources at the existing campus and would not result in notable changes on- or off-campus. Additionally, HVAC noise would be considerably lower than ambient noise levels, which are dominated by traffic. SC-N 2 also has restrictions on HVAC noise to limit potential noise impacts. Permanent stationary source noise increases would be less than significant and no further analysis is required.

4. Environmental Checklist and Analysis

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

Less Than Significant Impact.

Operations Vibration

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

Construction Vibration

Construction activities can generate varying degrees of ground vibration, depending on the construction procedures, the equipment used, and the proximity to vibration-sensitive uses. Operation of construction equipment generates vibrations that spread through the ground and diminish in amplitude with distance from the source. The effect on buildings near a construction site varies depending on soil type, ground strata, and receptor building construction. The generation of vibration can range from no perceptible effects at the lowest vibration levels, to low rumbling sounds and perceptible vibrations at moderate levels, to slight damage at the highest levels. Ground vibrations from construction activities rarely reach levels that can damage structures, but can achieve levels in buildings close to a construction site that are perceptible.¹²⁶ Table 10 lists vibration levels for different types of commonly used construction equipment.

Table 10 Typical Construction Equipment Vibration Levels

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

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

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

^b PPV – peak particle velocity measured in inches/second

¹²⁶ Federal Transit Administration (FTA). 2006, May. Transit Noise and Vibration Impact Assessment. U.S. Department of Transportation (DoT). FTA-VA-90-1003-06.

4. Environmental Checklist and Analysis

Construction vibration effects are typically assessed in terms of either architectural damage or annoyance to people nearby. Construction equipment such as pile drivers, jackhammers, high-power or vibratory tools, and heavy rolling stock equipment (tracked vehicles, compactors, etc.) could generate vibration in the immediate vicinity of their use. Typical construction equipment rarely exceeds vibration levels that are perceptible at more than 25 feet away from the source of the vibration.¹²⁷ Groundborne vibration is rarely annoying to people who are outdoors, so it is usually evaluated in terms of indoor receivers. For annoyance, vibration is typically noticed nearby when objects in a building generate noise from rattling windows or picture frames; impacts are based on the distance to the nearest building.¹²⁸

Construction Vibration-Induced Annoyance

Human annoyance occurs when vibration rises significantly above the threshold of human perception for extended periods of time. A threshold commonly used to assess when construction vibration becomes annoying is 78 VdB for residential uses.¹²⁹

Human annoyance occurs when construction vibration rises significantly above the threshold of human perception for extended periods of time. As such, vibration annoyance is typically assessed via a spatial-averaging methodology (i.e., as heavy construction equipment moves around the construction site, average vibration levels at the nearest structures would diminish with increasing distance between structures and the equipment). This methodology is implemented by using the distance from the center of the construction zone to the nearest sensitive receptors.

Off-Campus Receptors

The nearest off-site sensitive receptors are homes to the southeast across Peoria Street and Roscoe Boulevard, which are located approximately 575 feet from the center of the construction site. At this distance, average vibration levels generated by operation of a vibratory roller would be 53 VdB and levels due to use of a large bulldozer would be 46 VdB. These levels are below the 78 VdB threshold for vibration annoyance. Receptors at greater distances from the site would experience vibration levels lower than those at the residences to the southeast. Construction-generated average vibration levels would not exceed the annoyance threshold at any offsite receptors, annoyance impacts would be less than significant, and no further analysis is required.

On-Campus Receptors

Since construction activities may take place while school is in session and since temporary classroom facilities may be located near the construction site, it is possible that the students' learning activities could be affected due to annoyance and distraction from adjacent construction activities.

There would be several construction zones and active classrooms throughout the campus; therefore, it is not possible to provide a specific vibration level for each possible scenario over the course of the entire

¹²⁷ As measured at a distance of 25 feet from an individual piece of equipment perceptible vibration would be 0.1 peak particle velocity (PPV) in inches per second. Architectural damage at typical building structures may occur at 0.2 to 0.5 PPV in inches per second.

¹²⁸ Federal Transit Administration (FTA). 2006, May. Transit Noise and Vibration Impact Assessment. United States Department of Transportation. FTA-VA-90-1003-06.

¹²⁹ Federal Transit Administration (FTA). 2006, May. Transit Noise and Vibration Impact Assessment. United States Department of Transportation. FTA-VA-90-1003-06.

4. Environmental Checklist and Analysis

construction period. Generally, students in classrooms may experience vibration levels in excess of 78 VdB when large equipment operates within 50 feet of the classrooms, and 84 VdB within 35 feet. At 78 VdB vibrations are barely felt, but groundborne noise may be audible. Vibration levels would diminish rapidly with increased distance between the receptors and the equipment, and construction activities farther than 50 feet from classrooms would not be felt or heard. Implementation of SC-N-5 provides requirements for discussions between construction contractor and school administrators prior and throughout construction to schedule high vibration producing activities at times that minimize disruption to classes.

Compliance with SC-N-5 would reduce construction vibration and annoyance to staff and students in adjacent buildings. Additionally, school administration and the construction contractor will work together to coordinate and stay informed about construction activities, location, schedule, and possible vibration intensive activities during each construction phase. Administrators can arrange for alternative classroom occupancy in the event that construction vibration causes any disturbance to classroom instruction. Other typical methods for dealing with classroom disruption are for the construction contractor to conduct vibration intensive activities before or after class instruction at the nearest classrooms. Therefore, construction-generated vibration annoyance for on-campus receptors would be less than significant and no further analysis is required.

Construction Vibration-Induced Architectural Damage

Since damage from vibrational energy is typically a one-time event and is most likely to occur when the source and receptor are at their closest relative placement, the nearest reasonable position of individual construction equipment to a receptor building are used for architectural damage evaluations. A threshold commonly used to assess when there could be a risk of architectural damage is 0.200 peak particle velocity (PPV) in inches per second for typical residential and school buildings.¹³⁰ Vibration levels exceed 0.200 PPV in/sec if a vibratory roller is operated within approximately 30 feet of the receiving feature, or when large bulldozers or loaded trucks are operated at distances nearer than 15 feet (see Table 11).

Table 11 Construction Equipment Vibration Damage Potential

	PPV at < 20 Feet	PPV at 60 Feet	PPV at 100 Feet
Vibratory Roller	>0.293	0.056	0.026
Caisson Drill	>0.124	0.024	0.011
Large bulldozer	>0.124	0.024	0.011
Small bulldozer	>0.004	0.001	0.000
Jackhammer	>0.049	0.009	0.004
Loaded trucks	>0.106	0.020	0.010

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

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

¹³⁰ FTA category “non-engineered timber and masonry buildings”

4. Environmental Checklist and Analysis

Off-Campus Receptors

The nearest off-campus structures are homes to the east at approximately 60 feet from the nearest potential construction activity. At that distance, maximum vibration levels would be approximately 0.056 PPV. All other off-site structures are located at distances of greater than 60 feet. Therefore, construction-related, structural damage impacts to off-site buildings would be less than significant and no further analysis is required.

On-Campus Receptors

Many onsite buildings are located adjacent to areas where demolition of existing buildings and/or construction of new buildings will occur. As shown in Table 11, operation of large heavy construction equipment (most notably, vibratory rollers, but potentially also large bulldozers or loaded trucks) close to campus buildings may exceed the FTA's 0.200 PPV in/sec criteria threshold and may result in vibration-induced damage to the building façade.

As part of the Project, implementation of SC-N-6 requires that "if demolition is necessary adjacent to residential uses or fragile structures, LAUSD shall require the construction contractor to avoid using impact tools. Alternatives that shall be considered include mechanical methods using hydraulic crushers or deconstruction techniques." Although campus buildings are not considered historic, because of the age of the buildings the District would comply with LAUSD Standard Conditions of Approval SC-N-8 which requires the use of alternative methods of demolition and construction for activities within 25 feet of a historic building to reduce vibration impacts. Because Francis Polytechnic High School campus has not been identified as being an important historic resource either locally or regionally, this standard condition would apply to buildings that are more than 45 year old. Compliance with SC-N-6 and SC-N-8 would reduce vibration-induced architectural damage to adjacent, on-campus buildings to below the threshold of damage. Construction impacts would be less than significant and no further analysis is required.

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

Less Than Significant Impact. As described in section (a) above, increases in operational noise levels related to the Project would not increase the existing noise environment. Therefore, there would be no permanent noise increases due to the Project and impacts would be less than significant. No further analysis is required.

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

Less Than Significant Impact. Noise generated during construction is based on the type of equipment used, the location of the equipment relative to sensitive receptors, amount of equipment operating at the same time, and the timing and duration of the noise-generating activities. Sensitivity to noise is based on the location of the equipment relative to sensitive receptors, time of day, and the duration of the noise-generating activities. Two types of short-term noise could occur during construction: (1) mobile-source noise from the transport of workers, material deliveries, and debris/soil hauling and (2) on-site noise from use of construction equipment. Demolition and construction activities are anticipated to begin in Q1-2019 and

4. Environmental Checklist and Analysis

would consist of two 18-month phases. The noisiest portions of activities (i.e., the site preparation and grading phases) are expected to take a total of two months at the beginning of each phase.

The Los Angeles Municipal Code includes time restrictions for construction activities. According to Section 41.40, project-related construction activities must conform to the following hours:

- Monday – Friday: 7 AM to 10 PM
- Saturdays or National Holidays: 8 AM to 6 PM
- Not allowed on Sundays

Further, Section 112.05 specifies the maximum noise level for construction within 500 feet of residential uses as 75 dBA at a distance of 50 feet from the nearest residential property. However, this noise limitation does not apply where compliance is technically infeasible.¹³¹ Therefore, a significant impact would occur if 1) construction were to occur outside of the allowable hours or 2) project-related construction activities generated noise levels in excess of 75 dBA, as measured at 50 feet from the nearest residences.

Construction Vehicles

The transport of workers and equipment to the construction site would incrementally increase noise levels along site access roadways. The primary regional access route for construction vehicles to the school campus would be Roscoe Road and Arleta Avenue. It is anticipated that construction-related activities would generate, as a worst-case during the most active phase of construction, a maximum of 190 construction trips per day.¹³² This would be a negligible increase in comparison with the existing roadway volumes (which are expected to be in the range of 2,000 to 4,000 ADT). Additionally, truck trips would be spread out throughout the workday and would occur during non-peak traffic periods in accordance with SC-T-4.

Thus, the number of construction-related trips would not significantly increase traffic noise when compared to the level of noise currently generated on the roadways. While individual construction vehicle pass-bys may create momentary noise levels of up to approximately 85 dBA (L_{max}) at 50 feet from the vehicle, these occurrences would be infrequent and primarily during nonpeak traffic periods. Therefore, noise impacts from construction-related traffic would be less than significant and no further analysis is required.

Construction Equipment

Each stage of construction involves the use of different kinds of construction equipment and therefore has its own distinct noise characteristics. Table 12 shows the maximum operational noise levels of heavy construction equipment.

¹³¹ Technically infeasible means that the noise limitation cannot be met despite the use of mufflers, shields, sound barriers, and/or any other noise reduction device or techniques during the operation of equipment.

¹³² Based on CalEEMod analysis in Air Quality .

4. Environmental Checklist and Analysis

Table 12 Maximum Heavy Equipment Noise Levels

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

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

Construction Noise

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

The loudest construction phases have an aggregate of 89 dBA L_{eq} equivalent continuous sound level at a distance of 50 feet from the construction.¹³³ This value takes into account both the number of pieces and the spacing of the heavy equipment in use. Noise levels are typically reduced from this value due to usage factors as well as the barrier effects provided by the physical structures themselves (once erected). The 89 dBA L_{eq} is the value used for representing most construction activities.

¹³³ US Environmental Protection Agency, Noise from Construction Equipment and Operations, Building Equipment, and Home Appliances, prepared by Bolt, Beranek & Newman, December 1971.

4. Environmental Checklist and Analysis

Off-Campus

The nearest off-campus sensitive receptors are homes to the southeast and south across Peoria Street and Roscoe Boulevard, which are approximately 575 feet from the center of the construction site. Table 13 shows the average construction noise levels at several distances to sensitive receptors from use of typical construction equipment.

Table 13 Project-Related Construction Noise Levels

Equipment	dBA at 200 Feet	dBA at 275 Feet	dBA at 380 Feet	dBA at 725 Feet
Standard Construction Activities	75	74	71	65

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

As shown in Table 13, the construction noise levels would not exceed the construction noise limit of 75 dBA at 50 feet from the nearest residences (Section 112.05 of the City of Los Angeles Municipal Code). There may be short periods when a noisy piece of equipment could be near the campus boundary, and therefore may temporarily exceed 75 dBA; likewise, there may be short periods when construction equipment is located on the opposite side off the construction site, in which case noise levels would be much lower than the values presented in Table 13. These instances will be sporadic and intermittent; the average construction noise levels presented in Table 13 are used for impact significance. Additionally, construction activity noise in some areas would be attenuated by school buildings between the construction zone and residents.

According to Section 41.40, construction or repair work is allowed between 7:00 AM and 9:00 PM, Monday through Friday, or between 8:00 AM and 6:00 PM on Saturdays or national holidays (not allowed on Sundays). The District contractor would comply with permitted construction hours. Further, average construction noise levels would not exceed 75 dBA at 50 feet from the nearest residences. Based on estimated noise levels, impacts to surrounding residents would be less than significant and no further analysis is required.

On-Campus

Temporary classroom facilities located at approximately 50 feet of construction activities and also have a direct sightline, may experience exterior noise levels as high as 89 dBA L_{eq} . With a typical 25 dB exterior-to-interior noise reduction, interior noise levels may be as high as 64 dBA L_{eq} . Classrooms at approximately 100 feet of construction and also have a direct sightline, may experience exterior noise levels as high as 83 dBA L_{eq} . With a typical 25 dB exterior-to-interior noise reduction, interior noise levels may be as high as 58 dBA L_{eq} .

LAUSD's interior noise threshold is 45 dBA L_{eq} and depending on the classroom activity, interior levels above this threshold may be disruptive to the learning environment. However, low-intensity construction phases would generate lower noise levels and would be less likely to result in disruptions due to excessive interior noise environments. Additionally, for some construction activities, noise would be further reduced by shielding effects from buildings between the construction zone and classrooms.

Implementation of SC-N-5, SC-N-8 and SC-N-9 provide requirements for: construction equipment that is properly tuned and maintained to ensure excessive noise is not generated, discussions between construction

4. Environmental Checklist and Analysis

contractor and school administrators prior to and throughout construction to schedule high noise producing activities at times that minimize disruption to classes (SC-N-5); and alternative methods of demolition and construction for activities within 25 feet of a historic building (or non-historic buildings more than 45 year old) to reduce vibration impacts (SC-N-8) (this measure would also reduce noise in classrooms). Additionally, compliance with SC-N-9 requires source controls (time constraints, equipment location and type restrictions, etc.), path controls (noise barriers capable of attenuating construction noise by 15 dBA), and/or receptor controls (notification and noise complaint process) to reduce noise impacts. The specific method under SC-N-9 would depend on the type of construction noise, duration, and classroom disruption. As with other construction projects occurring at schools throughout the District, if construction occurs while classes are in session, school administrators will ensure that classroom instruction is not significantly affected by construction noise. School administrators would first use SC-N-5 and SC-N-8 to avoid noise disruptions. Then the administrators and construction contractor would implement SC-N-9 to control the timing for the operation of noise-generating equipment and would make every effort to move students away from noisy construction phases. Finally, if the construction noise disruption cannot be avoided the contractor would install a noise barrier.

Compliance with SC-N-5, SC-N-8 and SC-N-9 would reduce noise levels to active classrooms. Construction noise impacts would be less than significant and no further analysis is required.

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

No Impact. The nearest public airports to the school are Whiteman Airport, located approximately 2.5 miles to the north, and Bob Hope Airport, located 3 miles to the southeast. Additionally, Van Nuys Airport is located 5 miles to the west.¹³⁴ The school is outside any airport's influence area and the associated 65 dBA CNEL noise contours.¹³⁵ Therefore, the Project would not expose students and staff to excessive noise from aircraft at public airports above existing levels. No impact related to noise from public airports would occur and no further analysis is required.

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

No Impact. The school is not located within the immediate vicinity of a private airstrip or heliport. There are no private airports within 10 miles of the school. The nearest heliports are Barton Heliport at Whiteman Airport (2.5 miles to the north) and Van Nuys County Court Heliport (3.7 miles to the southwest). There are no other heliports within 5 miles of the school.¹³⁶ The Project would not expose students to excessive noise levels from private airstrip or heliports above existing levels. No impact related to noise from heliports or private airstrips would occur and no further analysis is required.

¹³⁴ Airnav.com. Airport Information. <http://www.airnav.com/airports/>.

¹³⁵ See the Noise Exposure Contour maps in Exhibits C, D, and F within the City of Los Angeles Noise Element (included in Appendix F).

¹³⁶ Airnav.com. Airport Information. <http://www.airnav.com/airports/>.

4. Environmental Checklist and Analysis

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XIII. PEDESTRIAN SAFETY. Would the project:				
a. Substantially increase vehicular and/or pedestrian safety hazards due to a design feature or incompatible uses?	<input 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:

LAUSD adopted Standard Conditions of Approval (SCs) that apply uniformly to all projects proposed by the District. Applicable SCs would minimize Project-related pedestrian safety impacts and are shown in the table below.

LAUSD Standard Conditions of Approval	
SC-T-2	School Design Guide. Vehicular access and parking shall comply with Section 2.3, Vehicular Access and Parking of the School Design Guide, January 2014. The Design Guide contains the following regulations related to traffic: <ul style="list-style-type: none"> • Parking Space Requirements • General Parking Guidelines • Vehicular Access and Pedestrian Safety
SC-T-4	LAUSD shall require its contractors to submit a construction worksite traffic control plan to the LADOT for review prior to construction. The plan will show the location of any haul routes, hours of operation, protective devices, warning signs, and access to abutting properties LAUSD shall encourage its contractor to limit construction-related trucks to off-peak commute periods. As required by Caltrans, applicable transportation related safety measures shall be implemented during construction.

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

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

Circulation design that would result in vehicular and/or pedestrian safety hazards would be sharp curves or dangerous intersections. These typically consist of new roads or driveways on busy roadways with left or right turns that force cross-traffic and create conflicts between cars and people. The Project would not create new roads or dangerous driveway turning movements. Minor improvements are planned for some street crossings and driveways to improve pedestrian safety. Student access and drop-off and pick-up locations would remain the same as existing conditions.

4. Environmental Checklist and Analysis

Construction activities may be considered an incompatible use because it would require the use of haul trucks, equipment, worker vehicles, and construction activities on the school campus while students are on the campus. The construction and demolition activities would result in a temporary increase in truck activity on the roadway network, but the trucks would not exceed the size and weight limits for public roadways and would not travel during peak traffic hours. Construction activity would not require roadway or sidewalk closures and/or traffic detours on school days.

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

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

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

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

Less Than Significant Impact. The Project would not alter the existing street, sidewalks, or pedestrian routes to school; would not create unsafe routes to schools for students walking from local neighborhoods; and would not bring more students to the school campus. The campus would continue to house the existing school programs and continue to serve approximately the same number of current and future students after Project implementation. During construction, pedestrian routes on campus may be temporarily altered by construction activities or the reorientation of campus components; however, alternative pedestrian routes would be provided (consistent with SC-T-4) for temporary pedestrian routes. Routes to school impacts would be less than significant and no further analysis 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 high school is approximately 1,000 feet east of the Hollywood Freeway (I-170) and approximately 1,600 feet south of the Golden State Freeway (I-5). The school is also adjacent to Roscoe Boulevard, a major arterial street that forms the campus's southern boundary. Arleta Avenue is a four-lane surface street that runs between the high school campus on the east and Byrd Middle School and other school programs on the west. A pedestrian bridge connects the two school campuses across Arleta

4. Environmental Checklist and Analysis

Avenue, providing a route of travel for students and LAUSD staff that does not require walking across the street. As discussed in the Interim Housing section in the Project Description, it is expected that all facilities would remain on the Polytechnic main campus during all phases of construction; however, there is the possibility that during implementation of the Project the Polytechnic HS students may use facilities such as the auditorium or gymnasium on the Byrd Middle School campus. If that were to occur, the Polytechnic HS students would use the pedestrian bridge to travel back and forth between the campuses. Therefore, no safety hazard would result from the use of Byrd Middle School facilities as needed.

While the Project is adjacent to a major arterial roadway and near to a freeway, the Project would not change existing operations of the school. The campus would continue to house existing school programs and would serve approximately the same number of current and future students after Project completion. Student routes to school would not be changed. The Project would not introduce any new hazards related to major arterial roadways or freeways, and impacts would be less than significant. No further analysis is required.

4. Environmental Checklist and Analysis

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

Explanation:

LAUSD adopted Standard Conditions of Approval (SCs) that apply uniformly to all projects proposed by the District. There are no population and housing SCs that would apply to this Project.

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

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

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

No Impact. The Project would modernize an existing high school campus and would not displace housing. No replacement housing would be required; therefore, no housing impacts would occur. No further analysis is required.

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

No Impact. There are no residents on the school campus. No impact would occur and no further analysis is required.

4. Environmental Checklist and Analysis

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

Explanation:

LAUSD adopted Standard Conditions of Approval (SCs) that apply uniformly to all projects proposed by the District. Applicable SCs would minimize Project-related public service impacts and are shown in the table below.

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

a) Fire protection?

Less Than Significant Impact. The City of Los Angeles Fire Department (LAFD) currently provides fire protection and emergency medical services to the school. The LAFD fire station assigned to the school area is Station 89 at 7063 Laurel Canyon Boulevard, 2.0 miles south.¹³⁷ Three other stations are within approximately 2.0 miles of the school: Station 77 to the east at 9224 Sunland Boulevard, Station 81 to the west at 14355 Arminta Street, and Station 7 to the northwest at 14630 Plummer Street. The Project would not make any programmatic changes at the campus and would not increase students at the school; therefore, it would not increase the need for fire protection services. LAUSD is required to coordinate with LAFD regarding fire equipment access during construction and specifications for the new emergency access driveways in compliance with SC-PS-1. Additionally, modernization of the school would not require construction of new or expanded fire stations. Impacts would be less than significant and no further analysis is required.

¹³⁷ City of Los Angeles Fire Department (LAFD). Accessed July 12, 2017. <http://www.lafd.org/fire-stations/station-results?st=716&address=12431%20Roscoe%20Blvd%2C%20Sun%20Valley%2C%20CA%2091352>.

4. Environmental Checklist and Analysis

b) Police protection?

Less Than Significant Impact. LAUSD's Los Angeles School Police Department (LASPD) is responsible for improving campus safety and creating safe school passages for students, staff, and the school community.¹³⁸ The school is in Beat 204 of the LASPD's Northeast Division. The Northeast Division is operated from the Maclay Middle School campus at 4500 Multnomah Street in the City of Los Angeles, approximately 3.1 miles to the north of the campus.¹³⁹ If required, LASPD would request assistance from the City of Los Angeles Police Department (LAPD). The school campus is in LAPD's Foothill Area, which is served by the Foothill Community Police Station at 12760 Osborne Street approximately 2.0 miles to the north.¹⁴⁰ The Project may cause a very slight increase in demands for police services during construction from possible trespass, theft, and/or vandalism. Active construction areas would be fenced, and the entire school campus is currently fenced and would remain secured during non-work hours. Any increase in police demands would be temporary and would not require construction of new or expanded police facilities. General campus activities are under the supervision of the school administrators and staff. The Project would not increase student population or demand and would not result in new adverse impacts on existing police service. Impacts would be less than significant and no further analysis is required.

c) Schools?

No Impact. The Project would make physical changes to the existing campus to enhance existing school programs. The modernized campus would not induce growth in the community, increase enrollment or capacity at the school, or otherwise increase demand for school services. The Project would not have an adverse physical impact on any existing schools and would have a beneficial impact on the Polytechnic HS campus. No impacts to schools would occur and no further analysis is required.

d) Parks?

Less Than Significant Impact. The Project would not have an adverse physical impact on any parks or necessitate the construction of new parks. The Project includes construction of a new gymnasium building. The current gymnasium buildings would generally remain accessible during construction of the new gymnasium building to the extent feasible. There may be several months during which an interim gymnasium or alternate location (such as the Byrd Middle School campus) is used; however, this would not result in the need for construction of new recreational facilities. The Project would not induce growth in the community, increase enrollment or capacity at the school, or otherwise increase the use of or demand for parks. Impacts to parks would be less than significant and no further analysis is required.

e) Other public facilities?

No Impact. The Project would not result in impacts associated with the provision of other new or physically altered public facilities (e.g., libraries, hospitals, childcare, teen or senior centers). Physical impacts to public

¹³⁸ Los Angeles School Police Department (LASPD). 2017, March 27. About LASPD. <http://achieve.lausd.net/Page/8851>.

¹³⁹ Los Angeles School Police Department (LASPD). 2015. Department Beats. https://achieve.lausd.net/cms/lib/CA01000043/Centricity/Domain/596/All_Beats.pdf.

¹⁴⁰ City of Los Angeles Police Department (LAPD). Foothill Community Police Station. http://www.lapdonline.org/foothill_community_police_station.

4. Environmental Checklist and Analysis

services are usually associated with population in-migration and growth, which increase the demand for public services and facilities. The Project would not result in an increase in school enrollment or capacity or induce population growth. Therefore, no impacts to other public facilities would occur and no further analysis is required.

4. Environmental Checklist and Analysis

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

Explanation:

LAUSD adopted Standard Conditions of Approval (SCs) that apply uniformly to all projects proposed by the District. There are no recreation SCs that would apply to this Project.

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

Less Than Significant Impacts. The Project would not significantly increase the use of existing neighborhood and regional parks or other recreational facilities. The Project would not result in an increase enrollment or capacity of the school and would not increase population in the surrounding community. The current gymnasium building would generally remain accessible during construction of the new gymnasium building to the extent feasible. There may be several months during which an interim gymnasium or alternate location (such as the Byrd Middle School campus) is used, however, this would not result in the need for construction of new recreational facilities. Therefore, it would not cause physical deterioration of neighborhood and regional parks or other recreational facilities. Less than significant impacts to existing parks would occur and no further analysis is required.

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

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

4. Environmental Checklist and Analysis

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

Explanation:

LAUSD adopted Standard Conditions of Approval (SCs) that apply uniformly to all projects proposed by the District. Applicable SCs would minimize Project-related traffic and circulation impacts and are shown in the table below.

LAUSD Standard Conditions of Approval	
SC-T-2	School Design Guide. Vehicular access and parking shall comply with Section 2.3, Vehicular Access and Parking of the School Design Guide, January 2014 (and/or Current Version). The Design Guide contains the following regulations related to traffic: <ul style="list-style-type: none"> • Parking Space Requirements • General Parking Guidelines • Vehicular Access and Pedestrian Safety
SC-T-4	LAUSD shall require its contractors to submit a construction worksite traffic control plan to the local City or County jurisdiction for review prior to construction. The plan shall show the location of any haul routes, hours of operation, protective devices, warning signs, and access to abutting properties. LAUSD shall encourage its contractor to limit construction-related trucks to off-peak commute periods. As required by Caltrans, applicable transportation related safety measures shall be implemented during construction.

Traffic calculation worksheets are included as Appendix G to this Initial Study.

4. Environmental Checklist and Analysis

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

Less Than Significant Impact.

Existing Conditions

Roadways

Existing roadways in the Project study area are described below:

Roscoe Boulevard is four-lane roadway that runs along the southern school boundary and classified as a Major Boulevard II in the City of Los Angeles General Plan. There are two lanes in each direction with a striped median. The intersection of Roscoe Boulevard at Arleta Avenue, and at Roscoe Boulevard at Peoria Street are signalized.

Arleta Avenue is a four-lane roadway that runs along the southwestern school boundary and is classified as Avenue II in the City of Los Angeles General Plan. There are two lanes in each direction, a striped median is provided midblock between Wicks Street and Roscoe Boulevard. The intersections of Arleta Avenue at Roscoe Boulevard and the intersection of Arleta Avenue at Wicks Street are signalized.

Wicks Street is two-lane roadway that runs along the northwestern school boundary classified as a Collector in the City of Los Angeles General Plan. There is one lane in each direction, no median is provided and curbside parking is allowed. The intersection of Arleta Avenue at Wicks Street is signalized, the intersection of Wicks Street at Sharp Avenue is an all-way-stop.

Peoria Street is two-lane roadway that runs along the southeastern school boundary classified as a Collector in the City of Los Angeles General Plan. There is one lane in each direction, no median is provided and curbside parking is allowed. The intersection of Peoria Street at Roscoe Boulevard is signalized, the intersection of Peoria Street at Sharp Avenue is an all-way-stop.

Sharp Avenue is two-lane roadway that runs along the northeastern school boundary classified as a Collector in the City of Los Angeles General Plan. There is one lane in each direction, no median is provided and curbside parking is allowed. The intersection of Sharp Avenue at Arleta Avenue is signalized, the intersection of Peoria Street at Sharp Avenue is an all-way-stop.

Intersections

The traffic analysis is based on the AM peak hour and school dismissal hour traffic volumes on the intersections in the vicinity of site. Intersection turn movement counts were taken at the study area intersections in June and August 2017 when the school was in session during the morning hours between 7:00 and 9:00 AM, and during the afternoon student dismissal hour between 2:00 and 4:00 PM.

4. Environmental Checklist and Analysis

To evaluate intersection level of service, the Los Angeles Department of Transportation (LADOT) relies on the Critical Movement Analysis (CMA), also known as Circular 212 Planning methodology. The CMA method provides a volume/capacity (v/c) ratio that corresponds to a LOS. The v/c ratio is based upon volumes by lane, signal phasing, and approach lane configuration. Level of service (LOS) values range from LOS A to LOS F. LOS A indicates excellent operating conditions with little or no delay to motorists, whereas LOS F represents congested conditions with excessive vehicle delay. LOS E is typically defined as the operating “capacity” of a roadway. LADOT established LOS D as the lowest acceptable operating condition.

The unsignalized intersections were analyzed using the all-way stop method and the two-way stop method from the HCM 2010. Delay was calculated based on the worst-case approach (in the case of one or two-way stop-controlled intersections), or average delay (in the case of all-way stop-controlled intersections), and used to find the corresponding LOS, as presented in the unsignalized column of Table 14. This methodology was used for unsignalized intersections.

Table 14 Intersection Level of Service (LOS) Criteria

LOS	Description	Signalized Intersections (Volume/Capacity ratio)	Unsignalized Signalized (Delay in seconds/vehicle)
A	EXCELLENT. No Vehicle waits longer than one red light and no approach phase is fully used.	0.00–0.60	≤ 10.0
B	VERY GOOD. An occasional approach phase is fully utilized; many drivers begin to feel somewhat restricted within groups of vehicles.	0.61–0.70	> 10.0 and ≤ 15.0
C	GOOD. Occasionally drivers may have to wait through more than one red light; backups may develop behind turning vehicles	0.71–0.80	> 15.0 and ≤ 25.0
D	FAIR. Delays may be substantial during portions of the rush hours, but enough lower volume periods occur to permit clearing of developing lines, preventing excessive backups.	0.81–0.90	> 25.0 and ≤ 35.0
E	POOR. Represents the most vehicles intersection approaches can accommodate; may be long lines of waiting vehicles through several signal cycles.	0.91–1.00	> 35.0 and ≤ 50.0
F	FAILURE. Backups from nearby locations or on cross streets may restrict or prevent movement of vehicles out of the intersection approaches. Tremendous delays with continuously increasing queue lengths.	>1.000	> 50.0

Sources: HCM 2010 and Transportation Research Board Circular 212

The levels of service (LOS) at six intersections were analyzed. The existing intersection LOS are summarized in Table 15 below. Currently all intersections operate at acceptable LOS.

4. Environmental Checklist and Analysis

Table 15 Existing Intersection LOS

Intersection	Traffic Control	Student Drop-off (AM Peak Hour)		Student Pick-up (Mid-Afternoon)	
		V/C or Delay	LOS	V/C or Delay	LOS
Arleta Ave at Wicks Street	Signalized	0.519	A	0.401	A
Arleta Avenue Driveway	Two-way stop	18.28 sec	C	15.81 sec	C
Arleta Avenue at Roscoe Blvd	Signalized	0.804	D	0.663	B
Peoria Street at Roscoe Blvd	Signalized	0.627	B	0.477	A
Peoria Street Driveway	Two-way stop	10.46 sec	B	9.73 sec	A
Peoria Street at Sharp Avenue	All-way stop	10.2 sec	B	9.12 sec	A

Note: To determine level of service for signalized intersections, the CMA methodology is used in terms of volume per capacity. For unsignalized intersections delay in seconds per vehicle is used.
LOS worksheets for existing conditions are in Appendix G

Public Transit, Pedestrian and Bicycle Facilities

There are several bus routes that operate in the vicinity of the proposed school site. Metropolitan Transportation Authority of Los Angeles County (Metro) Lines 152 and 353 run on Roscoe Boulevard, the nearest bus stops are located on the north side of Roscoe Boulevard east of Peoria Street, and on the south side of Roscoe Boulevard east of Arleta Avenue.

Paved sidewalks are on both sides of all surrounding streets (Roscoe Boulevard, Arleta Avenue, Peoria Street, Sharp Avenue, Wicks Street). Pedestrian actuated signalized crosswalks are present at intersections of Roscoe Boulevard and Arleta Avenue, and crosswalks are located at all unsignalized intersections in the area. In addition, a pedestrian bridge spans over Arleta Avenue from the southerly end of the Byrd Middle School parking lot to the Polytechnic High School buildings on the southwestern portion of the campus. There are no existing bicycle facilities on the segments of roadways adjacent to the school. However, as part of the Project several bike racks will be provided on the campus in compliance with CHPS Criteria.

Significance Criteria

According to LADOT's "Traffic Study Policies and Procedures," a transportation impact on an intersection shall be deemed significant in accordance with the criteria outlined in Table 16. A project would not result in a significant impact at an intersection if the intersection is projected to operate at LOS A or B.

Table 16 Significance Criteria For Traffic Impacts

Level of Service	Final V/C Ratio	Project-Related Increase in V/C
C	> 0.700 - 0.800	Equal to or greater than 0.040
D	> 0.800 - 0.900	Equal to or greater than 0.020
E, F	> 0.900	Equal to or greater than 0.010

4. Environmental Checklist and Analysis

Impact Analysis:

Temporary Construction Impacts

It is anticipated that Project construction would be approximately 3 years, from Q1-2019 to Q1-2022. Construction would consist of two 18-month phases. Project construction would generate trips from the work crew, haul trips, and equipment and materials delivery. As required by the City of Los Angeles Municipal Code Section 41.40, construction activities would not occur outside of the allowable hours of 7:00 AM to 9:00 PM during the weekdays, and between 8:00 AM to 6:00 PM on Saturdays and national holidays.

Construction staging (i.e., storage of equipment and materials) would be contained on the school campus. Parking for workers is anticipated to be provided in the staging areas and existing parking lots during all phases of construction. Project construction would not result in a substantial amount of truck traffic. Haul of debris from demolition and site preparation would result in up to 35 trips per day during 2 months. Throughout construction, the size of the work crew at the school each day would vary depending on the construction phase and the different construction activities taking place. An average of 50 workers would be onsite when students are present and a maximum of 150 workers would be onsite during peak periods (i.e., during summer break).¹⁴¹

Several parking lots and access driveways are located on the campus, it is anticipated that construction-related vehicles would utilize existing driveways off Arleta Avenue, Wicks Street, Sharp Avenue, and Peoria Street. According to SC T-4, a construction worksite traffic control plan would limit construction-related trucks to off-peak commute periods.

Compared to the existing traffic generated: 2,806 students at Polytechnic HS and 69 students at Robert H. Lewis Continuing Education High School (estimated at 1,237 AM peak hour trips and 4,916 average daily trips),¹⁴² the number of worker trips would be negligible. Additionally, maximum truck trips would be for a short duration and would be spread out throughout the workday and would occur during non-peak traffic periods in accordance with SC-T-4. Temporary delays in traffic may occur due to oversized vehicles traveling at lower speeds on streets. Such delays would be occasional and of short duration. During the building construction period, there would be an estimated 17 delivery trucks per day. Given the small number of trips per day and the duration of the construction phases, these temporary and intermittent delays are considered less than significant.

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

¹⁴¹ Worker trips based on California Emissions Estimator Model (CalEEMod), version 2016.3.1.

¹⁴² Based on the ITE Trip Generation Manual 9th Edition. Public school daily trip rates: High School with 2,806+69 students at 1.71 = 4,916 trips.

4. Environmental Checklist and Analysis

area roadways, and would not contribute to a significant increase in traffic volumes. Construction traffic impacts would be less than significant.

Finally, Project construction traffic would not displace bus stops or impact public transit bus services on Roscoe Boulevard. The construction worksite traffic control plan would include measures to prevent traffic and pedestrian hazards between trucks entering and exiting the school campus. Impacts would be less than significant.

Operational Phase Impacts

An analysis of traffic impacts was conducted by quantifying the before-and-after traffic volumes, then determining the V/C ratios and LOS at the study area intersections for the existing and “with Project” under three optional scenarios.

Polytechnic HS has about 2,806 students enrolled. The proposed modernization would not change the current capacity of the school or affect student enrollment. No changes to traditional school operations, school-related events, or community use would occur as the result of this Project. The levels of traffic that would be generated by the school and the geographical distribution of the school traffic on the public street network would remain unchanged compared to existing conditions. Therefore there would be no net increase in vehicular trips.

The main entrance to the campus is along Arleta Avenue just north of the Roscoe Boulevard intersection. Designated student drop-off and pick-up areas are along Arleta Avenue and Wicks Street; however observed drop-off and pick-up takes place along all surrounding streets as shown on Figure 6.

The Project would not change the student drop-off and pick-up areas and students will continue to be dropped-off and picked-up along Arleta Avenue, Wicks Street, Sharp Avenue and Peoria Street. The Project includes the following circulation improvements:

- Pedestrian facilities:
 - Reconstruct the curb ramp at the southeast corner of the intersection of Arleta Avenue and Wicks Street to meet current ADA standards.
 - Relocate pedestrian access point on Peoria Street: Relocate the pedestrian access point on Peoria Street further south, closer to Roscoe Boulevard to make the use of the crosswalk across Peoria Street the most direct pedestrian path of travel.
- Access driveways to Arleta Avenue and Peoria Street may be modified with one of the following options. Each option would include modifications to the parking lot and an increase of 66 spaces compared with existing conditions.
 - Option 1: Both driveways operate as they currently do, with right and left turns in and out.
 - Option 2: The driveway on Arleta Avenue is restricted to right turn in only and right turn out only. The driveway on Peoria Street remains unchanged.

4. Environmental Checklist and Analysis

- Option 3: The driveway on Peoria Street is removed so all traffic in and out of the parking lot uses the driveway on Arleta Avenue. Both right and left turns are permitted in and out of the driveway.

The improvements related to sidewalks and pedestrian travel would not alter traffic patterns or result in changes in capacity to accommodate vehicular travel. However, an increase of 66 parking spaces in the main parking lots on Roscoe Boulevard would have the potential to modify traffic patterns in the vicinity of the school. The following discusses potential impacts of each option:

Option 1

Option 1: Both Arleta Avenue and Peoria Street driveways operate as they currently do, with right and left turns in and out.

The only change to traffic under this option would be increasing the number of available spaces in the main parking lot by 44%. This increase in cars using the driveways at Arleta Avenue and Peoria Street would also increase traffic at the intersections in the vicinity of the school. As seen in Table 17, the changes result in a slight increase in volume-to-capacity ratios at signalized intersections and delay at unsignalized intersections; however, LOS does not deteriorate at any of the affected intersections. This option would have a less than significant impact and no further analysis is required for this option.

Table 17 Option 1 Traffic Conditions

Intersection	Traffic Control	Student Drop-off (AM Peak Hour)		Student Pick-up (Mid-Afternoon)	
		V/C or Delay	LOS	V/C or Delay	LOS
Arleta Ave at Wicks Street	Signalized	0.526	A	0.410	A
Arleta Avenue Driveway	Two-way stop	20.66 sec	C	17.36 sec	C
Arleta Avenue at Roscoe Blvd	Signalized	0.813	D	0.668	B
Peoria Street at Roscoe Blvd	Signalized	0.630	B	0.488	A
Peoria Street Driveway	Two-way stop	10.73 sec	B	9.88 sec	A
Peoria Street at Sharp Avenue	All-way stop	10.28 sec	B	9.17 sec	A

Note: To determine level of service for signalized intersections, the CMA metric is used in terms of volume per capacity. For unsignalized intersections delay in seconds per vehicle is used.

LOS worksheets for existing conditions are in Appendix G

Option 2

Option 2: The driveway on Arleta Avenue is restricted to right turn in only and right turn out only. The driveway on Peoria Street remains unchanged.

This option is assessed qualitatively because removing left turns at the Arleta Avenue driveway would eliminate the main conflicting movement with the through traffic, resulting in improved LOS at the Arleta Avenue driveway. No changes would occur at the Peoria Street driveway. While the parking lot would have increased capacity as in Option 1, the LOS would be very similar to Option 1 at all intersections, no

4. Environmental Checklist and Analysis

hazardous conditions or excessive queues would occur under this condition. Therefore, this option would have a less than significant impact and no further analysis is required for this option.

Option 3

Option 3: The Peoria Street driveway would be removed so all traffic in and out of the parking lot would use the driveway on Arleta Avenue. Both right and left turns are permitted in and out of the driveway.

This scenario increases the number of parking spaces in the main lot and closes the driveway on Peoria Street so that all cars using the lot must take Arleta Avenue to access the lot. This would cause an increase in traffic at the intersection of Arleta Avenue and Roscoe Boulevard. Table 18 shows the resulting V/C ratios at that intersection. Under Scenario 3, the changes in delay and v/c ratios would be negligible and there would be no change in intersection LOS intersection, except at the Arleta Avenue driveway. At the Arleta Avenue driveway (on campus), the egress driveway would experience a substantial increase in delay, deteriorating from LOS C to LOS F in the AM peak hour, and from LOS C to LOS D in the PM pick-up hour. However, this delay would be contained within the school parking lot and would not affect traffic on Arleta Avenue. The effect on through traffic on Arleta Avenue and other public streets would not be significant and would not worsen LOS at the City intersections. Since the Peoria Street driveway would be removed, traffic in the through direction on Peoria Street would slightly improve. Therefore, this option would have a less than significant impact and no further analysis is required for this option.

Table 18 Option 3 Traffic Conditions

Intersection	Traffic Control	Student Drop-off (AM Peak Hour)		Student Pick-up (Mid-Afternoon)	
		V/C or Delay	LOS	V/C or Delay	LOS
Arleta Ave at Wicks Street	Signalized	0.536	A	0.415	A
Arleta Avenue Driveway (on campus)	Two-way stop	58.91 sec	F	26.29 sec	D
Arleta Avenue at Roscoe Blvd	Signalized	0.819	D	0.673	B
Peoria Street at Roscoe Blvd	Signalized	0.616	B	0.443	A
Peoria Street Driveway	-	-	-	-	-
Peoria Street at Sharp Avenue	All-way stop	10.02 sec	B	8.99 sec	A

Note:

Peoria Street Driveway is eliminated in this option.

To determine level of service for signalized intersections, the CMA metric is used in terms of volume per capacity. For unsignalized intersections delay in seconds per vehicle is used.

Bold indicates deficient conditions

LOS worksheets for existing conditions are in Appendix G

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

No Impact. Metro implements the county's congestion management program (CMP). The CMP includes a system of arterial roadways and freeways. The CMP for Los Angeles County requires that the traffic impact

4. Environmental Checklist and Analysis

of individual development projects of potential regional significance be analyzed. Routes 5 and 170 are part of the CMP network, there are no CMP arterial intersections within 2 miles of the site. CMP guidelines require that freeway monitoring locations must be examined if the Project would add 150 or more trips (in either direction) during either the AM or PM weekday peak hours or 50 or more trips at CMP intersections during the AM or PM weekday peak hour. The Project would not meet this threshold for preparing a CMP facility traffic impact assessment.

The Project would not increase the capacity or enrollment at the school and therefore would not directly contribute to increases in traffic at the CMP intersection during AM and PM peak hour traffic. The Project would have the potential to slightly alter the traffic patterns in the immediate vicinity of the school (see item [a]), but would not affect CMP facilities. No impacts would occur and no further analysis is required.

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

No Impact. The nearest airport to the school is the Whiteman Airport in Pacoima, a general aviation airport approximately two miles north of the campus. Bob Hope Airport, a commercial airport in the City of Burbank, is approximately 3 miles to the southeast.¹⁴³ The school campus is not within the airport influence area or the airport land use planning area of either airport.¹⁴⁴ Project development would not result in a new use that would interfere with air traffic patterns or change traffic locations such that it would result in a safety risk. In addition, the Project would not increase demand for air travel or increase air traffic levels. No impacts would occur and no further analysis is required.

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

Less Than Significant Impact.

Temporary Construction

During construction, construction equipment, trucks, and workers would drive to and from the construction areas shown in Figure 11 via Arleta Avenue, Peoria Street, Sharp Avenue and Wicks Road. Construction workers normally arrive at 7:00 AM and depart approximately at 4:00 PM, prior to student drop-off times (which occur between 7:30 AM and 8:15 AM) and after student dismissal (which occurs prior to 3:30 PM). Therefore, the majority of construction trips would not overlap with student drop-off and pick-up. The truck trips would be spread out throughout the workday and would occur during nonpeak traffic periods in accordance with SC-T-4. In compliance with SC-T-4, LAUSD's construction contractor would prepare a construction worksite traffic control plan prior to commencement of construction which would be reviewed by Los Angeles DOT. This plan would establish methods to avoid conflicts between the construction traffic and the existing street, pedestrian, and bicycle traffic. LAUSD's construction BMPs, identified in the

¹⁴³ Caltrans. 2016, March. 2016 California Public Use Airports and Federal Airfields.
http://dot.ca.gov/hq/planning/aeronaut/documents/maps/PublicUseAirports_MilitaryAirfieldsMap.pdf.

¹⁴⁴ Los Angeles County Department of Public Works. 2017, August. Los Angeles County Airports.
<http://dpw.lacounty.gov/avi/airports/map.aspx?extent=-13182592.650342794,4063015.015811797,-13180758.161663902,4064543.7563775414>.

4. Environmental Checklist and Analysis

construction worksite traffic control plan, would include the location of any haul routes, hours of operation, protective devices, warning signs, and access to abutting properties. Additionally, construction fencing would be used on campus to separate construction zones from students and to ensure safety. Implementation and compliance with the construction worksite traffic control plan would address potential hazardous conditions. The Project construction would not create new hazards or conflicts and impacts related to vehicular or pedestrian and bike safety would be less than significant. No further analysis is required.

Operational Impacts

The Project would not increase the capacity or enrollment at the school and would therefore not increase operational traffic on or around the campus. The Project would not alter the use of the school campus, and no new incompatible uses would be introduced. The streets in the school vicinity have sidewalks, and the signalized intersections are equipped with painted crosswalks, pedestrian signals, and pedestrian push buttons to activate the signals. The number of students and the geographical distribution of the students' residences would remain largely unchanged. The Project would not change the student drop-off and pick-up areas and students will continue to be dropped-off and picked-up along Arleta Avenue, Wicks Street, Sharp Avenue and Peoria Street. Figure 9, shows the pedestrian access locations and walkways. The only walkway that may cross any vehicular access driveway would be the egress driveway to Peoria Street at the southeastern portion of the campus. This is an existing condition where the sidewalk on Peoria already crosses the parking lot egress driveway. Given the low traffic volumes egressing the driveway and the lack of view obstructions, this crossing would not result in a substantial hazardous condition.

The Project includes improvements at pedestrian facilities discussed previously, which would reconstruct a curb ramp and change the pedestrian access point on Peoria Street. These improvements were designed to improve pedestrian access and safety by complying with ADA Standards and providing a more direct travel path. None of these improvements would create hazards. Therefore, no operational impacts would occur and no further analysis is required.

e) Result in inadequate emergency access?

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

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

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

The Project would not change the student drop-off and pick-up areas and students will continue to be dropped-off and picked-up along Arleta Avenue, Wicks Street, Sharp Avenue and Peoria Street. No major

4. Environmental Checklist and Analysis

changes would occur to sidewalks along the streets in the school vicinity in the school vicinity, or public transit. As discussed in response a), there would be improvements to a curb ramp and a pedestrian access point that were designed to improve pedestrian travel and safety. The Project would not, therefore, conflict with policies, plans, or programs regarding transit, bicycle, or pedestrian facilities, and the Project would not decrease the performance or safety of such facilities. However, as part of the Project several bike racks will be provided on the campus in compliance with CHPS Criteria. No impacts would occur and no further analysis is required.

4. Environmental Checklist and Analysis

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

Explanation:

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

LAUSD Standard 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 evaluated by a qualified archaeologist and the local Native American representative has been contacted and consulted to assist in the accurate recordation and recovery of the resources.

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

No Impact. Assembly Bill 52 (AB 52) requires meaningful consultation with California Native American tribes on potential impacts to tribal cultural resources, as defined in PRC Section 21074. Tribal cultural resources are sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either eligible or listed in the California Register of Historical Resources or local register of historical resources.¹⁴⁵

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

¹⁴⁵ California Natural Resources Agency. AB 52 Regulatory Update. <http://resources.ca.gov/ceqa/>.

4. Environmental Checklist and Analysis

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

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

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

No Impact. To date, LAUSD has not received any requests for notification or consultation from California Native American Tribes regarding resources defined by PRC Section 21074. No Tribal resources have been identified and the school campus is unlikely to yield sensitive resources during ground disturbance as discussed in Section V, Cultural Resources (b). There is no substantial evidence that tribal cultural resources are present on the existing school campus. No impacts would occur and no further analysis is required.

4. Environmental Checklist and Analysis

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

Explanation:

LAUSD adopted Standard Conditions of Approval (SCs) that apply uniformly to all projects proposed by the District. Applicable SCs would minimize Project-related utilities and service system impacts and are shown in the table below.

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

4. Environmental Checklist and Analysis

SC-GHG-1	During school operation, LAUSD shall perform regular preventative maintenance on pumps, valves, piping, and tanks to minimize water loss.
SC-GHG-2	LAUSD shall set automatic sprinklers to irrigate landscaping during the early morning (overhead and drip) and evening (drip only) to reduce water loss from evaporation.
SC-GHG-3	LAUSD shall reset automatic sprinkler timers to water less during cooler months and during the rainy season.
SC-GHG-4	LAUSD shall develop a water budget for landscape (both non-recreational and recreational) and ornamental water use to conform to the local water efficient landscape ordinance. If no local ordinance is applicable, then use the landscape and ornamental budget outlined by the California Department of Water Resources.

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

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

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

No Impact. Water treatment facilities filter and/or disinfect water before it is delivered to customers. The City of Los Angeles Department of Water and Power supplies water to the school campus and would continue to supply water to the school. The school modernization would serve existing and future students living in the region and would not increase the student population or water treatment demands in the Project region. No impact would occur and no further analysis is required.

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

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

No Impact. Project development would include storm drainage improvements onsite discharging to the existing storm drainage infrastructure. Runoff from proposed buildings would be conveyed by existing storm drains in the campus to existing RCPs within the right-of-way of adjacent surface streets (i.e., Arleta Avenue, Peoria Street, Roscoe Boulevard, and Wicks Street) that are between 39 and 63 inches wide.¹⁴⁶ LID stormwater management would be incorporated into the Project design pursuant to requirements of the

¹⁴⁶ Los Angeles County Department of Public Works (LACDPW). 2017, March 24. Los Angeles County Storm Drain System. <http://dpw.lacounty.gov/fcd/stormdrain/index.cfm>.

4. Environmental Checklist and Analysis

County LID Standards Manual and SC-HWQ-01. LID principles are described further in Section VI, *Geology and Soils*, of this Initial Study. Therefore, the on-site drainage system would discharge a net decrease in runoff to municipal storm drains. Construction of the onsite stormwater management measures would not cause a significant impact on the environment. The Project would not require the construction of new or expanded storm drains. No impact would occur and no further analysis is required.

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

No Impact. The school currently serves students living in the region, and school modernization would not increase the student population or long-term water demands in the Project region. Water would be used on site during construction for dust suppression and similar activities. The small amount of water that would be used for the Project construction would not result in the need for new or expanded water entitlements. Installation of landscape and irrigation improvements would comply with SC-USS-2, SC-USS-3, and SC-GHG-1 through SC-GHG-4 for water conservation. No impact would occur and no further analysis is required.

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

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

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

Less Than Significant Impact. The two largest destinations for solid waste generated in the City of Los Angeles are the Chiquita Canyon and Sunshine Canyon Landfills. The Project would not increase the student population and thus would not increase solid waste generation.

The Project would require haul and disposal of contaminated soil and material (see VIII, *Hazards and Hazardous Materials*). Contaminated soil and material would result in an incremental and intermittent increase in solid waste disposal at licensed landfills and other waste disposal facilities within Los Angeles County. LAUSD would be required to comply with the Sanitation Districts of Los Angeles County standards for contaminated soil and material.

Demolition and construction waste would be generated and disposed of at local landfills. Section 5.408 (Construction Waste Reduction, Disposal, and Recycling) of the CALGreen Building Standards Code (Title 24, CCR, Part 11, Section 5.408.1.1) requires that at least 65 percent of the nonhazardous construction and demolition waste from nonresidential construction operations be recycled and/or salvaged for reuse. This is also required by CHPS criteria. Under SC-USS-1, LAUSD has established a minimum construction and demolition debris salvage, recycle, and reuse of 75 percent. Construction of the Project would adhere to these established standards. Therefore, demolition of existing onsite improvements would not adversely impact such landfills. Impacts would be less than significant and no further analysis is required.

4. Environmental Checklist and Analysis

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

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

4. Environmental Checklist and Analysis

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XX. MANDATORY FINDINGS OF SIGNIFICANCE.				
a. Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Does the project have impacts which are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of 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. As discussed in Sections I, *Aesthetics*, and IV, *Biological Resources*, the Project would neither degrade the quality of the environment nor substantially impact any endangered fauna or flora. The Project would demolish existing buildings, construct new ones, and modernize others on an existing school campus and would not change the aesthetics in surrounding neighborhoods. Because the school is fully developed and the surrounding area is highly urbanized, the Project would not impact the habitat or population level of a fish, plant, or animal community or the range of a rare or endangered plant or animal. Mandatory compliance with MBTA, Fish and Game Code and LAUSD Standard Condition SC-BIO-3 would avoid or limit potential impacts to nesting birds.

As discussed under Section V, *Cultural Resources*, impacts related to archaeological, paleontological, and historic resources and human remains would be less than significant. No further analysis is required.

4. Environmental Checklist and Analysis

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

Less Than Significant Impact. Based on the preceding discussion, with implementation of LAUSD Standard Conditions of Approval and compliance with existing regulations, the Project is not anticipated to result in significant adverse operational impacts that could contribute to a cumulatively considerable impact. Impacts would be less than significant and no 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 discussed in the above analyses, the Project would not result in significant direct or indirect adverse impacts or result in substantial adverse effects on human beings. No further analysis is required.

4. Environmental Checklist and Analysis

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5. List of Preparers

5.1 LEAD AGENCY

Los Angeles Unified School District, Office of Environmental Health & Safety

Gwenn Godek, CEQA Advisor | Contract Professional

Will Meade, Environmental Planning Specialist

5.2 CEQA CONSULATANT

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Maria Heber, Clerical

5. List of Preparers

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Appendices

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- A. Air Quality and Greenhouse Gas Emissions Background and Modeling Data
- B. Tree Health and Impact Assessment
- C-1. LAUSD Historic Resources Survey Report
- C-2. Preliminary Historic Resource Evaluation Report
- D. Report of Geotechnical Investigation
- E-1. Phase I Environmental Site Assessment
- E-2. Preliminary Environmental Assessment Equivalent
- F. Noise and Vibration Background and Modeling Data
- G. Traffic Modeling Worksheets
- H. Response to Comments

Appendices

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