

# **Roosevelt High School Comprehensive Modernization Project Initial Study**

**Lead Agency:**

**Los Angeles Unified School District (LAUSD)**

333 South Beaudry Avenue  
Los Angeles, California 90017

**Prepared by:**

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**October 2017**

# CALIFORNIA ENVIRONMENTAL QUALITY ACT INITIAL STUDY CHECKLIST

<b>LEAD AGENCY</b> Los Angeles Unified School District (LAUSD)		<b>DATE</b> October 2017
<b>LEAD AGENCY CONTACT</b> Edward Paek, AICP CEQA Project Manager LAUSD Office of Environmental Health & Safety 333 S. Beaudry Avenue, 21st Floor Los Angeles, CA 90017	<b>PHONE NUMBER</b> (213) 241-4676	
<b>SCHOOL SITE</b> Roosevelt High School	<b>SCHOOL SITE ADDRESS</b> 456 South Mathews Street Los Angeles, CA 90033	
<b>PROJECT TITLE</b> Roosevelt High School Comprehensive Modernization Project	<b>LAUSD LOCAL DISTRICT</b> Central	<b>LAUSD COLIN ID</b> 10366803
<b>EXISTING ZONING</b> PF (Public Facilities)	<b>EXISTING LAND USE DESIGNATION</b> Boyle Heights Community Plan Area	<input checked="" type="checkbox"/> <b>REQUIRES STATE FUNDING</b>

## PROJECT DESCRIPTION

The proposed Project consists of the modernization of Roosevelt Senior High School with new classrooms, a gymnasium, a lunch shelter, and an auditorium. The proposed Project is designed to address the most critical physical concerns of the buildings 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.

## SURROUNDING LAND USES AND SETTING

The land uses surrounding the Project site are primarily single and multi-family residential, with some institutional (e.g., school, hospital and church), commercial, and recreational uses. Immediately south of the site, across East 6<sup>th</sup> St. is Hollenbeck Middle School. Several small parks, recreation centers, and libraries are located in the surrounding area, including Hollenbeck Park 0.32 miles to the west, Boyle Heights Sports Center Facility 0.3 miles to the south, Evergreen Recreation Center approximately 0.25 miles to the northeast, and Benjamin Franklin Library 0.5 miles to the northwest.

## OTHER PUBLIC AGENCY APPROVALS

Reviewing Agencies

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

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- California Office of Historic Preservation (OHP). Review of historic building preservation and renovation plans
  - State Water Resources Control Board (SWRCB). Review of Notice of Intent (NOI) to obtain permit coverage; issuance of general permit for discharges of stormwater associated with construction activity; review of Storm Water Pollution Prevention Plan (SWPPP)
  - Los Angeles Regional Water Quality Control Board (LARWQCB). Issue National Pollution Discharge Elimination System (NPDES) permit; Clean Water Act Section 401 Water Quality Certification
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**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.<sup>1</sup>

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## **Project Overview**

The Los Angeles Unified School District (LAUSD or District) is proposing a comprehensive modernization of Theodore Roosevelt Senior High School (Roosevelt HS, Roosevelt High), located at 456 South Mathews Street, Los Angeles, CA 90033 (Project or proposed Project). The proposed Project is designed to address the most critical physical concerns of the buildings 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.<sup>2</sup> **Figure 4, Conceptual Site Plan**, shows the footprint and layout of the proposed Project. A detailed description of the proposed Project's components and design is provided below. The proposed Project is required to undergo an environmental review pursuant to the California Environmental Quality Act (CEQA). This Initial Study provides a preliminary evaluation of the potential environmental consequences associated with the Project.

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<sup>1</sup> Final text for tribal cultural resources update to Appendix G: Environmental Checklist Form. 2016, September 29. The AB 52 regulations adopted by the California Natural Resources Agency were approved by the Office of Administrative Law, and will appear in the California Code of Regulations. Copies of the rulemaking materials can be found at: <http://resources.ca.gov/ceqa/>.

<sup>2</sup> LAUSD Board of Education Report. December 8, 2015. Report Number 182-15/16. Subject: Amendment to the Facilities Services Division Strategic Execution Plan to Approve Project Definitions for Six Comprehensive Modernization Projects and Cancel Two Critical School Repair and Safety Projects.

## Existing Facilities

Roosevelt HS campus currently consists of 23 permanent buildings (including the gazebo, arcade, and bleachers) and 23 portable buildings, some of which serve a part of the Boyle Heights Continuation High School, the Roosevelt Adult School, and the Roosevelt Infant/Early Education Center. As of 2010, portable buildings contained 31 classrooms and the permanent buildings held 143 classrooms (both standard classrooms and small classrooms). There are also 8,495 square feet of sheltered lunch area, 7.1 acres of playground, and 268 parking spaces on the Project site.<sup>3</sup>

**Table 1, Summary of Existing Facilities and Figure 1, Existing Campus Site Plan,** show existing campus facilities.

**Table 1  
Summary of Existing Facilities**

Building ID <sup>a</sup>	Building Number	Building Name	Classrooms <sup>b</sup>	Building Square Footage	Building Type	Year Built
21585	1	Auditorium & Classroom Bldg.	48	108,270	permanent	1922
15158	2	Cafeteria Bldg.	--	12,586	permanent	1977
24018	3	Classroom Bldg.	8	8,896	permanent	1977
21641	4	Music Bldg.	2	3,630	permanent	1977
23689	5	Administration & Classroom Bldg.	19	57,709	permanent	1972
24215	6	Industrial Arts Bldg.	7	25,546	permanent	1968
17199	7	Classroom Bldg.	17	26,097	permanent	1937
21890	8	Instrumental Music Bldg.	1	1,800	permanent	1959
17742	9	Garage Bldg.	--	889	permanent	1972
22718	10	Flammable Storage Bldg.	--	60	permanent	1953
25799	11	Field Sanitary Bldg.	--	562	permanent	1958
25770	12	Equipment Field Storage	--	528	permanent	1941
18415	13	Gazebo	--	466	permanent	1977
NIA	14	Home Bleachers – West (new)	--	5,600	permanent	2008
NIA	15	Visitor Bleachers – East (new)	--	NIA	permanent	2008
20549	16	Field Light Controls	--	72	permanent	1949
23829	17	Classroom Bldg.	4	3,940	permanent	1964
21628	18	Class room Bldg.	4	3,940	permanent	1964
20906	19	Physical Education Bldg.	--	38,799	permanent	1968
23892	20	Utility Bldg.	--	2,537	permanent	1968
15815	21	Auto Service Bldg.	--	900	permanent	1975
36022	22	Arcade	--	36	permanent	1977
20796	23	Library & Classroom Bldg.	11	35,120	permanent	1990

<sup>3</sup> Johnson Favaro, 2010.

Building ID <sup>a</sup>	Building Number	Building Name	Classrooms <sup>b</sup>	Building Square Footage	Building Type	Year Built
20955	24	Two/Three Unit Relocatable	2	1,920	portable	1971
20958	25	Two/Three Unit Relocatable	2	1,920	portable	1971
22262	26	Two/Three Unit Relocatable	2	1,792	portable	1959
21332	27	Two/Three Unit Relocatable	2	1,824	portable	1950
21330	28	Two/Three Unit Relocatable	2	1,824	portable	1954
21319	29	Two/Three Unit Relocatable	2	1,792	portable	1960
21691	30	Two/Three Unit Relocatable	2	1,792	portable	1966
21098	31	Two/Three Unit Relocatable	3	2,688	portable	1961
20171	32	Two/Three Unit Relocatable	1	864	portable	1950
21634	33	Sanitary Relocatable Bldg.	--	320	portable	1975
21914	34	Two/Three Unit Relocatable	2	1,728	portable	1950
21629	35	Single Unit Relocatable	2	896	portable	1966
20329	36	Single Unit Relocatable	1	1,728	portable	1950
21251	37	Single Unit Relocatable	2	896	portable	1966
21373	38	Single Unit Relocatable	1	896	portable	1966
22228	39	Single Unit Relocatable	1	896	portable	1966
21682	40	Single Unit Relocatable	1	896	portable	1967
18330	41	Single Unit Relocatable	--	1,456	portable	1972
23828	42	Two/Three Unit Relocatable	1	1,792	portable	1967
34750	43	2 Classroom Relo-DOH/Parent Center	2	1,440	portable	NIA
<b>Approximate campus building space</b>				<b>367,343</b>		

*a As listed in section 5.4 Building Condition Analysis (FCI Report) of the Roosevelt High School Comprehensive Modernization Project document, dated January 19, 2016.*

*b As listed in section 2.0 Existing Site Survey and Investigation of the Roosevelt High School Comprehensive Modernization Project document, dated January 19, 2016.*

*NIA – no information available*

Roosevelt HS opened to students in 1923 with one main building—the auditorium/classroom building (Building 1) — fronting Fickett Street.<sup>4</sup> This building, plus three others: Industrial Arts (Building 6), auto service shed (Building 21), and the gymnasium (Building 19) are on the Assembly Bill (AB 300) (Corbett) Seismic Safety Inventory of California Public Schools, Department of General Services Building List. The AB 300 list identifies those school buildings that are of concrete tilt-up construction and those with non-wood frame walls that do not meet the minimum requirements of the 1976 Uniform Building Code (UBC). AB 300 identified 269 of the LAUSD's nearly 13,000 buildings for seismic evaluation. In 2006, upon further analysis by LAUSD staff, including site visits and field investigations, a total of 667 buildings were identified for seismic evaluation based upon AB 300 criteria and LAUSD's higher standards.<sup>5</sup> Since that time, seismic evaluations have been performed on school buildings identified to be

<sup>4</sup> ASM Affiliates, “Draft Supplemental Historic Resource Evaluation Report for Roosevelt Senior High School, Los Angeles, Los Angeles County, California”, (June 20, 2017).

<sup>5</sup> LAUSD. AB-300 Criteria Building List. Web. <<http://www.laschools.org/new-site/ab300/LAUSD-AB300-CRITERIA-BUILDING-LIST.pdf>>

the most seismically vulnerable, and projects have been developed to address the buildings determined to be in the greatest need of structural upgrades.<sup>6</sup>

Currently, the campus has capacity to serve 2,755 students, in 9th through 12th grades. Roosevelt HS is a member of the Partnership for Los Angeles Schools (PLAS), which is a non-profit “in-district public school transformation organization”<sup>7</sup> that manages a portfolio of some of LAUSD’s historically underserved public schools located in Boyle Heights, Watts, and South Los Angeles. In addition to the traditional curriculum, the campus houses the Math, Science and Technology Magnet Academy and the Science, Technology, Engineering and Math (STEM) Academy of Boyle Heights.

### **Project Location and Surrounding Uses**

The Project site is located at 456 South Mathews Street in the Boyle Heights Community Plan Area (CPA) of the City of Los Angeles. The Project site is 22.7 acres and bounded by East 4<sup>th</sup> Street to the north, South Mathews Street to the west, South Mott Street to the east, and East 6<sup>th</sup> St. to the south (**Figure 2, Regional Location**). To the southwest of the Project site lies the intersection of I-5, I-10, U.S. Highway 101, and State Route 60. Regional access to the Project site is provided by any of these roads from the junction, as well as from I-10 and I-5 from the west, 101 from the north, and State Route 60 from the south. Local access is provided via East 4<sup>th</sup> Street along the northern boundary of the site and S. Soto Street to the northwest.

The land uses surrounding the Project site are primarily single and multi-family residential, with some institutional (e.g., school, hospital and church), commercial, and recreational uses. Immediately south of the site, across East 6<sup>th</sup> St. is Hollenbeck Middle School. Approximately 0.1 miles west of the Project site is Promise Hospital of East L.A. and 0.4 miles to the east is the Our Lady of Talpa School and the affiliated church. Approximately 0.3 miles northeast of the Project site is the Evergreen Recreation Center and a grocery store (Food 4 Less). Hollenbeck Park is approximately 0.32 miles to the west. Other commercial facilities in the vicinity include a bank, a beauty supply store, and a fast food restaurant (Carl’s Jr). At the north end of the Project site, 0.1 miles across South Mathews Street, is a small market (La Princesa Tortilleria).

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<sup>6</sup> LAUSD. Seismic Safety of School Buildings. Web. <<http://www.laschools.org/new-site/ab300/?keyword=roosevelt&destination=ab300>>

<sup>7</sup> Partnership for Los Angeles Schools (PLAS). Web. <<https://partnershipla.org/>>.



**ROOSEVELT HS - LEGEND**

③ BUILDING NUMBER

PERMANENT

PORTABLE

**BOYLE HEIGHTS CONT. EDUCATION - LEGEND**

③ BUILDING NUMBER

PORTABLE

**ROOSEVELT ADULT SCHOOL - LEGEND**

③ BUILDING NUMBER

NOTE - NOT ON SITE

**ROOSEVELT INFANT / EARLY EDUCATION CENTER - LEGEND**

③ BUILDING NUMBER

PORTABLE



SOURCE: LAUSD, 2017

FIGURE 1



Existing Campus Site Plan

## Campus History

Roosevelt HS was constructed in 1922 and began operation a year later in 1923. The school was developed to help curb over-crowding at Los Angeles public schools. The campus quickly expanded, adding shop classrooms, a cafeteria, a gymnasium and tennis courts by 1925. By 1926, the growth of Roosevelt HS necessitated the demolition of all remaining residential structures on the property, which were replaced with a playground, an athletic field, and a new classroom building. The campus was retrofitted after the Long Beach Earthquake in 1933 and in the 1960's the school expanded to incorporate the entire city block.<sup>8</sup>

In March 1968, Roosevelt HS, along with four other LAUSD high schools (Lincoln, Garfield, Belmont, and Wilson), was the site of mass student walkouts, also known as "Blowouts". The Blowouts were associated with community activism under the growing Chicano Civil Rights Movement, also known as "El Movimiento" or "The Movement."<sup>9</sup>

In 1970, Roosevelt HS was subject to arson and small bombing events by the Chicano Liberation Front on three separate occasions. Although no one was injured, damage to two main buildings required repairs. In the following years, new buildings were constructed for early-childhood education, music, general classrooms, and a cafeteria. The school would continue to be developed with the addition of contemporary buildings, athletic fields, and an outdoor swimming pool.<sup>10</sup>

## Project Need

The proposed Project has been developed under the LAUSD's School Upgrade Program (SUP) to improve student health, safety, and education through the modernization of school facilities. Roosevelt HS was identified as one of 11 schools in the District most in need of an upgrade due to the physical condition of the facilities. Based on an assessment of the following conditions, the 11 proposed school sites were identified as having a multitude of critical physical conditions

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<sup>8</sup> Environmental Science Associates (ESA). 2016. *Landscape and Cultural Analysis for Theodore Roosevelt Senior High School*. October.

<sup>9</sup> ASM Affiliates, *Draft Supplemental Historic Resource Evaluation Report for Roosevelt Senior High School, Los Angeles, Los Angeles County, California, June 20, 2017*.

<sup>10</sup> ESA, 2016.



that may pose a health and safety risk or negatively impact a school's ability to deliver the instructional program and/or operate:<sup>11</sup>

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

On December 10, 2013, the District refined the SUP to reflect the intent and objectives of Measure Q as well as the updated needs of District school facilities and educational goals.<sup>12</sup>

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<sup>11</sup> Los Angeles Unified School District (LAUSD). 2015a. *Board of Education Report 373-14/15* . March.

Between July 2013 and November 2015, the SUP Program Environmental Impact Report (Program EIR) was analyzed under CEQA criteria.<sup>13</sup> On November 10, 2015, the BOE certified the Program EIR.<sup>14</sup>

In December 2010, Johnson Favaro performed a site evaluation of Roosevelt HS to serve as a pre-planning survey for impending developments. The study found much of the campus to be in some sort of disrepair, from exposed piping in the Auditorium and Classroom building to the football field's failure to meet District standards. Findings included bungalows that are not Division of State Architect (DSA)-approved and noncompliance with American with Disabilities (ADA) legislation. Many of the classrooms on the campus do not meet current California Department of Education (CDE) standards (educational specifications for classroom size, layout, amenities, etc.) and the auditorium does not meet current District standards. School administrators identified inadequate classroom facilities and safety and supervision issues campus-wide.<sup>15</sup>

On March 10, 2015, the BOE approved pre-design and due diligence activities necessary to define the proposed Project.<sup>16</sup> On December 8, 2015, the BOE approved the project definition for the Roosevelt HS Comprehensive Modernization Project, along with five other schools. The proposed Project is designed to address the most critical 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.<sup>17</sup> Assessments of the school facilities, educational programming, and infrastructure were performed by industry professionals, as well as seismic and historic evaluations. The findings, coupled with input from community members, school users and stakeholders, called for improvements with an anticipated cost of over \$100 million. To

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<sup>12</sup> LAUSD Board of Education Report. December 10, 2013. Report Number 143 – 13/14. Subject: School Upgrade Program.

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

<sup>14</sup> LAUSD Regular Meeting Stamped Order Of Business. 333 South Beaudry Avenue, Board Room, 1 p.m., Tuesday, November 10, 2015 (Board of Education Report No. 159 – 15/16).

<sup>15</sup> Johnson Favaro, 2010.

<sup>16</sup> 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.

<sup>17</sup> LAUSD Board of Education Report. December 8, 2015. Report Number 182-15/16. Subject: Amendment to the Facilities Services Division Strategic Execution Plan to Approve Project Definitions for Six Comprehensive Modernization Projects and Cancel Two Critical School Repair and Safety Projects.

maximize the cost efficiency, the proposed Project suggests the demolition and rebuilding of certain campus buildings as outlined in the Project Description.<sup>18</sup>

## **Project Description**

The proposed Project encompasses most of the 22.7-acre Roosevelt HS campus and consists of the comprehensive modernization of the campus. The proposed Project would modernize Roosevelt HS to facilitate a safe and secure campus that better aligns with the current instructional program and meets current DSA educational specifications. When completed, the proposed Project will provide the capacity for 2,600 students in 111 classrooms, which is a reduction of 21 classrooms from the current count of 132 classrooms.

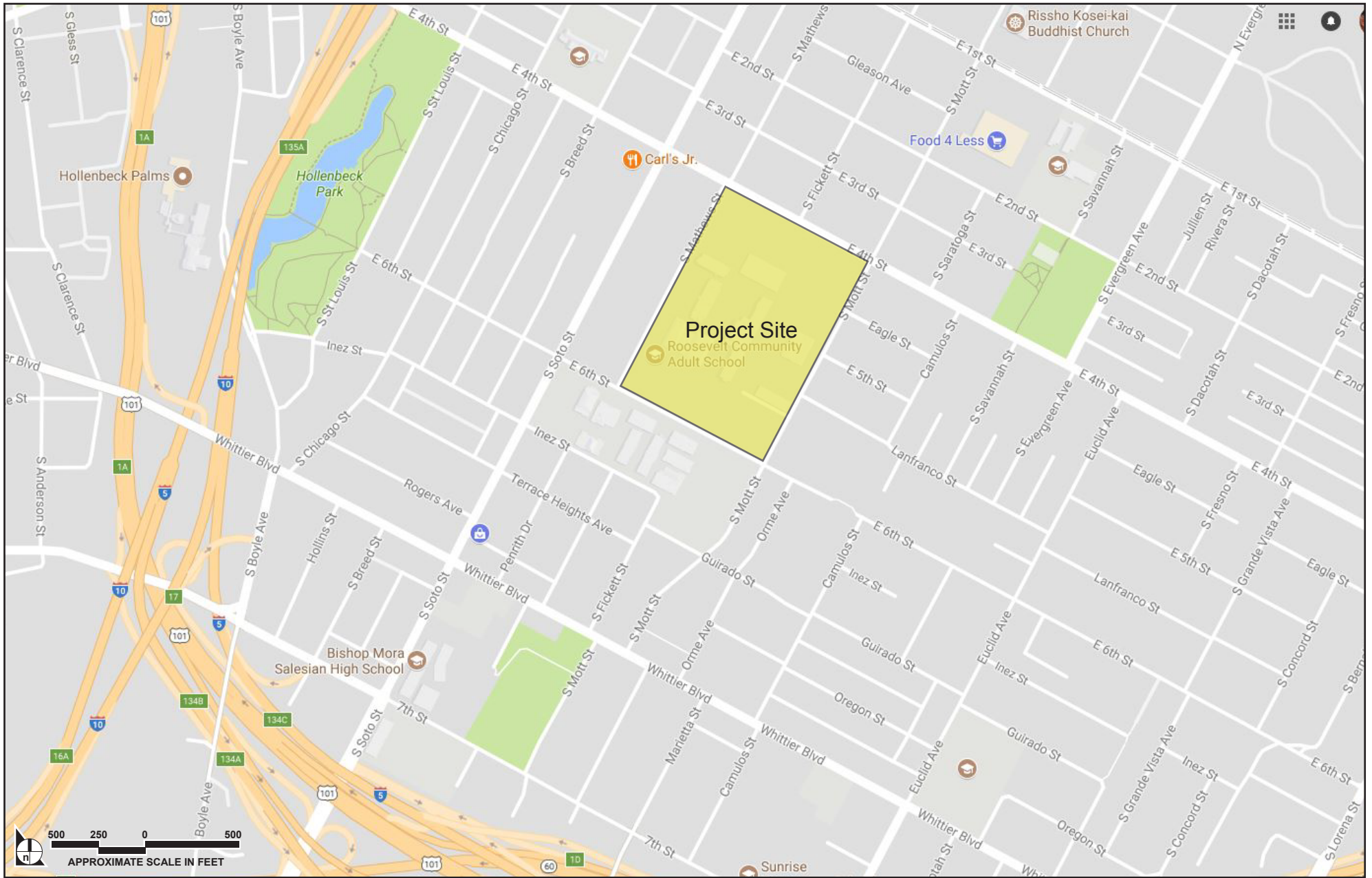
Portions of the campus that will not be affected by the Project include the administrative, classroom, cafeteria, and library buildings located in the northern portion of the campus along Mathews Street, as well as the facilities for the Boyle Heights Continuation High School and Roosevelt Infant/Early Education Center. Recreation areas such as the pool, football field, and baseball/softball fields are also outside the scope of the proposed Project.

The proposed Project consists of the demolition and removal of existing permanent and relocatable buildings, construction of new buildings, and landscape and access improvements throughout the campus. Specifically, the proposed Project would include the following components, as discussed in detail below and shown in **Figure 4, Conceptual Site Plan**.

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<sup>18</sup> LAUSD 2015a.





SOURCE: Google Maps, 2017

FIGURE 3

Project Vicinity



SOURCE: LAUSD, 2017

FIGURE 4

## Demolition and Removal

The proposed Project would include the demolition of temporary buildings that would be replaced by permanent structures and permanent buildings that have been determined to be structurally compromised beyond repair and/or aging; deteriorating; and which do not meet current educational requirements::

- Auditorium/classroom (Building #1)
- Music building (Building #4)
- Industrial arts building (Building #6)
- Two-story classroom building (Building #7)
- Instrumental music building (Building #8)
- Classroom building (Building #17)
- Classroom building (Building #18)
- Gymnasium building (Building #19)
- Utility building (Building #20)
- Auto Shop building (Building #21)
- Lunch shelter/arcade (Building #22)
- Approximately thirty-one classrooms in 17 portable buildings

## New Construction

The proposed Project would include the construction of the following new permanent structures to replace those that would be demolished or removed:

- Classroom/Administration Building North: This new 3-story approximately 70,000 square foot (sf) building would have general and specialty classrooms and administrative spaces and would act as the primary main entrance for campus visitors. This building would generally be located on the site of the existing tennis courts and gymnasium (Building #19).
- Auditorium and Performing Arts Building: This new 1-story approximately 35,000 sf building would have the auditorium and classroom spaces specifically designed for

performing arts, including music, dance, drama, and choral arts, etc. This building would generally be located on the site of the existing athletic field on 4<sup>th</sup> Street and the gymnasium (Building #19)

- Classroom Building South: This new 3-story approximately 75,000 sf building would have general and specialty classrooms and support spaces, including flexible engineering labs, computer labs and science laboratory classrooms. This building would be generally located on the site of the existing auditorium and classroom building (Building #1).
- Gymnasium Building: The 2-story, approximately 43,000 sf Gymnasium Building would have competition and practice gymnasium floors, locker rooms (restrooms, showers, and dressing area), coaches' offices, and physical education support spaces along with support spaces for athletic storage and mechanical equipment. The gym would have approximately 800 bleacher seats. This building would generally be located on the site of the existing auditorium and classroom building (Building #1) and utility buildings (Buildings #20 and #47).
- Lunch Shelter: The new approximately 7,000 sf lunch shelter would be located at or near the location of the existing lunch shelter.
- Wellness Clinic: An approximately 6,000 sf wellness clinic would provide services to both students and the community. The clinic would be located near the Classroom/Administration Building, library building, and pool.



## Site Upgrades

Site upgrades that would be implemented under the proposed Project include the following:

- Major Site-wide infrastructure, including domestic water; irrigation; gas; sewer; fire, telephone, and data systems; electrical; storm drainage.
- Site-wide programmatic access upgrades to comply with the ADA.
- Major Site-wide revamp of the campus landscaping and hardscaping, including relocation of the existing Japanese Garden. Existing trees removed by the Project would be reused to the extent feasible or replaced by an appropriate size and species selected from the LAUSD Approved Plant List.<sup>19</sup>
- Application of fresh paint to the exterior of the remaining Roosevelt HS buildings

The Project will be subject to local, state, and/or federal facilities requirements of the ADA, DSA, and CDE, as well as all District Standards and Specifications; such as those provided in LAUSD's Program EIR.<sup>20</sup> Any needed improvements to ensure compliance with such legislation will be incorporated within the Project.<sup>21</sup>

## Access and Circulation

The primary pedestrian access to the Project site would be provided along 4<sup>th</sup> Street. Access to staff parking would remain on Mathews Street. Approximately 8-10 parking stalls would be provided on 4<sup>th</sup> Street for visitors, staff, and accessible parking near the administration building.

## Excavation and Off-Site Disposal

As a part of the construction activities, the District would implement a Removal Action Workplan (RAW) for the proposed Project. As identified in the Preliminary Environmental Assessment Equivalent (PEA-E) Report prepared for the Project, approximately 7,019 cubic yards of soil containing the chemicals of concern (COCs); specifically, arsenic, lead, petroleum

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<sup>19</sup> LAUSD, LAUSD Approved Plants List, 2012, [http://www.laschools.org/documents/download/sustainability%2Fwater\\_conservation%2FCopy\\_of\\_Updated\\_Plant\\_List\\_2012.pdf](http://www.laschools.org/documents/download/sustainability%2Fwater_conservation%2FCopy_of_Updated_Plant_List_2012.pdf)

<sup>20</sup> LAUSD. 2015. School Upgrade Program Final Environmental Impact Report, <http://achieve.lausd.net/ceqa>. Adopted by the Board of Education on November 10, 2015.

<sup>21</sup> LAUSD, 2015a.

hydrocarbons, at levels that exceed the District's cleanup goals, would be removed from areas located throughout the Project site.<sup>22</sup> The excavation would be performed using heavy equipment consisting of, but not limited to, an excavator, backhoe, loader, and dump truck. Ancillary facilities (i.e., wastewater holding tank) would also be used during the removal action. Excavation operations may generate fugitive dust emissions. Suppressant foam, water spray, and other forms of vapor and dust control may be required during excavation, and workers may be required to use personal protective equipment to reduce exposure to the COCs. The depth of excavations may be limited due to physical constraints associated with the Project site. Sloping excavation sidewalls and slot-cutting may result in increased volume of soil requiring excavation. Confirmation soil sampling and analysis would be conducted to verify soil impact concentrations at the excavation bottom and sidewalls.

Excavated soil would be either directly-loaded into waiting dump trucks or temporarily stockpiled within an on-site "holding area" using a rubber-tire backhoe or similar equipment (such as wheel loader). Any temporary soil stockpiles would be properly secured and protected until ready for loading for off-site transportation and disposal to an appropriate facility. Truck loading would take place concurrently with excavation operations associated with the Project. Clean, imported soil or other fill material would be brought to the site to backfill areas where impacted soil was removed. Imported soil and/or other fill material would be accompanied by certificates, analytical data, and/or other supporting documents that indicate the import material is in conformance with cleanup criteria.

### **Construction Schedule**

Construction activities are anticipated to begin in Q3-2018 and will be substantially completed in Q4-2022.

The entire demolition, construction, and modernization activities are expected to take approximately 48 months. 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 on-site when students are present. A maximum of 150 workers will be on site during peak construction periods when school is not in session (i.e. winter, summer breaks).

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<sup>22</sup> TRC Solutions. August 2017. Roosevelt Senior High School: Preliminary Environmental Assessment Equivalent Report.

As Roosevelt High School is an active campus, construction of the new buildings and modernization must be phased in a way to maintain the academic functions. To complete the comprehensive campus-wide modernization while school is in session, the construction process must be broken down into several phases so that the school can continue operating.

## **Tiering**

The proposed Project is one of many types of projects that were analyzed in the Program EIR, certified by the LAUSD BOE on November 10, 2015.<sup>23</sup> LAUSD's SUP EIR meets the criteria of a Program EIR under CEQA Guidelines Section 15168 (a)(4) as one "prepared on a series of actions that can be characterized as one large project and are related...[a]s individual activities carried out under the same authorizing statutory or regulatory authority and having generally similar environmental effects which can be mitigated in similar ways."

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

The Program EIR is applicable to all projects implemented under the SUP. The 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,"<sup>24</sup> and Type 3, "Modernization, Repair, Replacement, Upgrade, Remodel, Renovation and Installation."

The proposed Project is considered a site-specific project under the SUP and analyzed in the Program EIR; therefore, the EIR will be tiered from the 2015 Program EIR. The Program EIR is

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<sup>23</sup> LAUSD OEHS. "School Upgrade Program Final Environmental Impact Report." <http://achieve.lausd.net/ceqa>. Adopted by the Board of Education on November 10, 2015.

<sup>24</sup> 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.

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.

## **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),<sup>25</sup> LAUSD Standard Conditions of Approval, and the Collaborative for High Performance Schools (CHPS) criteria.<sup>26</sup>

### Sustainable Design Features

LAUSD is the first school district in the United States to adopt and implement the Collaborative for High Performance Schools (CHPS) Criteria.<sup>27</sup> The BOE adopted a Resolution on High Performance School Facilities requiring Phase II of the new school construction program and future phase schools to be certified according to CHPS.<sup>28</sup> These measures are considered beneficial to improving environmental quality, as well as the learning environment. LAUSD has incorporated these into the Project design and operation of projects as part of standard LAUSD practices. The CHPS criteria are assumed to be part of the District's projects as they may apply to specific projects and are not included as mitigation measures. CHPS recommends flexible standards to promote energy efficiency, water efficiency, site planning, materials, and indoor environmental quality.

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<sup>25</sup> CALGreen. California Green Building Standards Code, Title 24, Part 11, of the California Code of Regulations.

<sup>26</sup> The Board of Education's October 2003 Resolution on Sustainability and Design of High Performance Schools, directs staff to continue its efforts to ensure that every new school and modernization project in the District, from the beginning of the design process, incorporate CHPS (Collaborative for High Performance Schools) criteria to the extent possible.

<sup>27</sup> Los Angeles Unified School District. *Key OEHS Programs*. Available at: <http://achieve.lausd.net/Page/3495>

<sup>28</sup> Los Angeles Unified School District. 2003. *Board of Education Resolution, Sustainability and the Design and Construction of High Performance Schools*. October. Available at: [http://www.laschools.org/documents/download/sustainability%2Fhealthy\\_schools%2FBoard\\_Resolution\\_on\\_CHPS.pdf](http://www.laschools.org/documents/download/sustainability%2Fhealthy_schools%2FBoard_Resolution_on_CHPS.pdf)

## Project Design Features

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

## Standard Conditions of Approval

LAUSD Standard Conditions of Approval (SC) are uniformly applied development standards and were adopted by the LAUSD BOE in November 2015.<sup>29</sup> The SCs have been updated since the adoption of the 2015 version in order to incorporate and reflect changes in the recent laws, regulations, and the Los Angeles Unified School District's standard policies, practices, and specifications. The SCs were compiled from established LAUSD standards, guidelines, specifications, practices, plans, policies, and programs, as well as typically applied mitigation measures. The conditions are divided into the 18 LAUSD CEQA environmental topics (Appendix G of the CEQA Guidelines plus Pedestrian Safety).<sup>30</sup> For each SC, compliance is triggered by factors such as the project type, existing conditions, and type of environmental impact. Compliance with every condition is not required.

## Mitigation Measures

If, after incorporation and implementation of federal, state, and local regulations; CHPS prerequisite criteria; PDFs; and SC, 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.

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<sup>29</sup> 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).

<sup>30</sup> The LAUSD Standard Conditions of Approval only covers 18 topics. However, as of September 2016 an additional environmental topic (Tribal Cultural Resources) has since been required by the State Office of Planning and Research. The LAUSD Environmental Checklist now has 19 topics.

- Rectifying the impact by repairing, rehabilitating, or restoring the impacted environment.
- Reducing or eliminating the impact over time by preservation and maintenance operations during the life of the action.
- Compensating for the impact by replacing or providing substitute resources or environments.

Mitigation measures must be project specific and must further reduce significant environmental impacts by implementing requirements or efforts that exceed compliance with federal, state, and local laws and regulations; CHPS criteria; PDFs; and SCs.

The specific, applicable LAUSD SCs are identified under each CEQA topic.<sup>31</sup> Federal, state, regional, and local laws, regulations, plans, and guidelines; CHPS criteria; PDFs; and SCs are considered part of the Project and are included in the environmental analysis.

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<sup>31</sup> 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>.

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

**DETERMINATION (To be completed by the Lead Agency):**

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 in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- I find that the proposed Project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- I find that the proposed Project MAY have a "potentially significant" 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 the 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.



10/11/2017

Signature

Date

Robert Laughton, Director  
Office of Environmental Health & Safety  
CEQA Officer of the Los Angeles Unified School District

## EVALUATION OF ENVIRONMENTAL IMPACTS:

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



- 7) Supporting Information Sources. A source list should be attached and other sources used or individuals contacted should be cited in the discussion.
- 8) This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected.
- 9) The explanation of each issue should identify:
  - a) the significance criteria or threshold, if any, used to evaluate each question; and
  - b) the mitigation measure identified, if any, to reduce the impact to less than significant.

Issues:		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
I.	<b>AESTHETICS. Would the project:</b>				
a)	Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b)	Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c)	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"/>

The Program EIR included SCs for minimizing impacts to aesthetic resources of the existing environment in areas where future projects would be implemented under the SUP. Applicable SCs related to aesthetic resource impacts associated with the proposed Project are provided below.

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

- SC-AE-6:** During, and after, installation of lights, the Project shall comply with the School Design Guide, which 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.

**Responses:**

- a) **Less than Significant Impact.** Scenic views are typically defined as those that provide expansive views of a highly-valued landscape for the benefit of the general public. The Project site is located in community of Boyle Heights, in a primarily urban area dominated by single and multi-family dwellings and commercial uses. The Project site is located in an area of relatively flat topography and dense development; however, intermittent views of the distant San Gabriel Mountains are available from Soto Street.

Although the proposed Project would change existing views by adding new structures and demolishing old ones, existing views within the right-of-way would not be affected. In addition, regarding viewshed obstruction, the proposed Project would be subject to **SC-AE-3** listed above.

The proposed Project consists of new buildings that would be one to three stories in height (approximately 57 feet to the top of the highest roof and approximately 67 feet to the top of the mechanical screens on the three-story classroom buildings), which is similar to the existing building massing on the site. As views are intermittent and no expansive vistas are available, construction of the proposed Project would not have a substantial effect on a scenic vista.

Thus, impacts related to scenic views/vistas would be less than significant and no further analysis is required in the EIR.

- b) **No Impact.** There are no designated state scenic highways within, or adjacent to, the Project site<sup>32</sup>. The nearest state scenic highway is State Route 2, also known as the Historic Angeles Crest Highway, approximately 13 miles north of Roosevelt HS. In addition, the California Department of Transportation (Caltrans) has designated a six-mile portion of the Arroyo Seco Parkway [e.g., State Route 110 (SR-110)] as an historic parkway. The Arroyo Seco Parkway is approximately four miles west of the Project site. The Project site cannot be viewed from either highway. As such, no impact would occur on the scenic highways by the proposed Project and no further analysis is needed.
  
- c) **Less than Significant Impact.** Visual quality is a measure of the overall impression or appeal of an area as determined by the particular landscape's characteristics and scenic resources (e.g., Santa Monica Mountains, Pacific Ocean, etc.). It is possible for new structures to be compatible with the existing setting if they replicate existing forms, lines, colors, and textures of the surrounding environment and if the new structures do not appreciably change the balance of natural elements. In summary, visual quality is concerned with the overall attractiveness of an area and the ability to preserve this attractiveness when new features are introduced.

The visual setting of the area is generally urbanized. Surrounding visual elements include single-family homes, multi-family homes, street trees, and Hollenbeck Middle School consisting of a middle school campus and play courts.

### **Construction**

Evaluation of construction impacts focuses on the short-term visual impacts resulting from the demolition and removal of current buildings, construction of the proposed Project, as well as the presence of equipment and material storage. In a visual sense, construction impacts from the proposed Project could be obtrusive, or out of character with the surrounding landscape. Construction equipment and materials, exposed dirt and unfinished buildings would temporarily impact the visual character of the Project site. Motorists traveling on any of the roads bordering the Project site, as well as the

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<sup>32</sup> California Department of Transportation, California Scenic Highway Mapping System, [http://www.dot.ca.gov/hq/LandArch/16\\_livability/scenic\\_highways/index.htm](http://www.dot.ca.gov/hq/LandArch/16_livability/scenic_highways/index.htm), accessed March 21, 2017.

immediate neighbors to Roosevelt HS, would be able to view the site. However, construction fencing would be provided around any active construction and staging areas, for both screening and security, and, as construction is short-term, the impact will be less than significant and no further analysis is required.

## **Operation**

Once construction is completed, the Project site will be similar to pre-Project conditions. The aging buildings will be replaced with buildings of similar, although slightly larger size and massing. The Project will also reduce the inventory of portable buildings and small single or two-story buildings that inefficiently utilize the site areas. The Project will have more open space areas for physical education. New landscape, hardscape, and exterior paint will provide beneficial long-term visual impacts to the area. The changes at the Project site would substantially improve the visual appearance of Roosevelt HS, and would not substantially degrade the visual character, or quality of the site, or introduce any aesthetic elements that are not compatible with the surrounding land uses. Thus, impacts would be less than significant, and no further analysis is necessary.

- d) Less than Significant Impact.** Light impacts are typically associated with the use of artificial light during the evening and nighttime hours. Glare may be a daytime occurrence caused by the reflection of sunlight or artificial light from highly polished surfaces, such as a window glass and reflective cladding materials, and may interfere with the safe operation of a motor vehicle on adjacent streets. Daytime glare is common in urban areas and is typically associated with mid- to high-rise buildings with exterior façades largely, or entirely, comprised of highly reflective glass, or mirror-like materials. Nighttime glare is primarily associated with bright point-source lighting that contrasts with existing low ambient light conditions.

The Project site is located in an urban environment with streetlights and moderate nighttime illumination from existing residential dwellings. Uses surrounding the Project site that are sensitive to light levels and glare include residences immediately surrounding the school. All new outdoor lighting being added as part of the proposed Project would be subject to **SC-AE-6** through **SC-AE-8** listed above.

All lighting of outdoor areas would be directed onto the Project site to avoid any light impacts from lighting fixtures included in the proposed Project. Additionally, the Project

would be constructed in accordance with the CHPS Criteria SS5.1: Light Pollution Reduction. Additionally, exterior lighting shall only be provided when it is clearly required for safety and comfort, and is designed not to exceed 80 percent of the lighting power allowed by the California energy efficiency standards in effect at the time of submission of the Project to the DSA.

For new buildings on an existing campus, additions, and major modernizations, the exterior lighting requirement applies to the entire school site, not just the lighting around the building(s) being modernized. In accordance with the 2016 School Design Guide, all luminaries, or lighting sources, in connection with school construction projects shall be installed in such a manner as to minimize glare for pedestrians and drivers and to minimize light spilling onto adjacent properties.<sup>33</sup> Implementation of these SCs and adherence to the requirements set by CHPS would ensure impacts related to light and glare remain less than significant. No further analysis is required.

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<sup>33</sup> LAUSD, Design Standards Department. 2016 School Design Guide. October 2016

Issues:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<p>II. <b>AGRICULTURE AND FORESTRY RESOURCES.</b> In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. Would the project:</p>				
<p>a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	Issues:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The Program EIR did not require SCs for minimizing impacts to agriculture and forestry resources where future projects would be implemented under the SUP. Likewise, there are no applicable or required SCs related to agriculture and forestry resources associated with the proposed project.

**Responses:**

- a) **No Impact.** Prime Farmland, Unique Farmland, and Farmland of Statewide Importance are all categorized by the California Department of Conservation, Division of Land Protection as “Important Farmland.” As the Project site is in an urbanized residential area, it is not located within an area designated as Important Farmland, nor does it



contain any prime or unique farmland.<sup>34</sup> No impact on farmland or agricultural resources would occur from the proposed Project and no further analysis is required.

**b,e) No Impact.** The Project site is located within the Boyle Heights CPA of the City and is zoned Public Facilities (PF). No agricultural use is permitted within these zoning designations and no conversion of Farmland would result from the proposed Project. Only land located within an agricultural preserve is eligible for enrollment under a Williamson Act contract. The Project site does not contain any lands covered by a Williamson Act Contract.<sup>35</sup> Therefore, the proposed Project would have no impact on agricultural zoning, Williamson Act contracts, and/or result in the conversion of Farmland, and no further analysis is required.

**c,d) No Impact.** There are no forest lands or timberlands on the Project site. Consequently, there is no conflict with rezoning of forest, or timberlands. No impact would occur from the proposed Project and no further analysis is required.

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<sup>34</sup> California Division of Land Resources Protection. *Farmland Mapping and Monitoring Program*. Available at: <http://www.conservation.ca.gov/dlrp/fmmp/Pages/LosAngeles.aspx>, accessed February 8, 2017.

<sup>35</sup> ZIMAS, [zimas.lacity.org](http://zimas.lacity.org), accessed March 30, 2017.

Issues:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>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:</b>				
a) Conflict with or obstruct implementation of the SCAQMD or Congestion Management Plan?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Expose sensitive receptors to substantial pollutant concentrations?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

	Issues:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
e)	Create objectionable odors affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The Program EIR included SCs for minimizing impacts to air quality resources of the existing environment in areas where future projects would be implemented under the SUP. Applicable SCs related to air quality resource impacts associated with the proposed Project are provided below.

**SC-AQ-1** OEHS CEQA Specification Manual, Appendix J, Air Toxics Health Risk Assessment (HRA)

This document includes guidance on HRA protocols for permitted, non-permitted, and mobile sources that might reasonably be anticipated to emit hazardous air emissions and result in potential long-term and short-term health impacts to student and staff at the school site.

**SC-AQ-2** LAUSD’s construction contractor shall ensure that construction equipment is properly tuned and maintained in accordance with manufacturer’s specifications, to ensure excessive emissions are not generated by unmaintained equipment.

**SC-AQ-3** LAUSD’s construction contractor shall:

- Maintain slow speeds with all vehicles
- Load impacted soil directly into transportation trucks to minimize soil handling
- Water/mist soil as it is being excavated and loaded onto the transportation trucks
- Water/mist and/or apply surfactants to soil placed in transportation trucks prior to exiting the site
- Minimize soil drop height into transportation trucks or stockpiles during dumping

- During transport, cover or enclose trucks transporting soils, increase freeboard requirements, and repair trucks exhibiting spillage due to leaks
- Cover the bottom of the excavated area with polyethylene sheeting when work is not being performed
- Place stockpiled soil on polyethylene sheeting and cover with similar material
- Place stockpiled soil in areas shielded from prevailing winds

**SC-AQ-4** LAUSD shall prepare an air quality assessment:

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

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

Exhaust Emissions

- Schedule construction activities that affect traffic flow to off-peak hours (e.g. between 10:00 AM and 3:00 PM)
- Consolidate truck deliveries and/or limit the number of haul trips per day
- Route construction trucks off congested streets
- Employ high pressure fuel injection systems or engine timing retardation
- Utilize ultra-low sulfur diesel fuel, containing 15 ppm sulfur or less (ULSD) in all diesel construction equipment
- Use construction equipment rated by the United States Environmental Protection Agency as having Tier 3 (model year 2006 or newer) or Tier 4 (model year 2008 or newer) emission limits for engines 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 area 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 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 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

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

**Responses:**

a) **Potentially Significant Impact.** The Project site is located within the South Coast Air Basin (SoCAB) and is subject to the Air Quality Management Plan (AQMP) prepared by the South Coast Air Quality Management District (SCAQMD). The SCAQMD has adopted a 2012 AQMP which focuses on achieving clean air standards while accommodating population growth forecasts compiled by the Southern California Association of Governments (SCAG). According to the SCAQMD *CEQA Air Quality Handbook*, a project would have a significant impact if it conflicts with or delays implementation of the applicable AQMP. A project is consistent with the AQMP if it meets the following indicators:

- The project will not result in an increase in the frequency or severity of existing air quality violations or cause or contribute to new violations, or delay the timely attainment of air quality standards or the interim emissions reductions specified in the AQMP.
- The project will not exceed the assumptions in the AQMP in 2017 or increments based on the year of project buildout (2022).

The proposed Project could potentially exceed the significance thresholds for construction and/or operational emissions. In addition, the Project could potentially exceed the screening criteria for the localized significance thresholds. Therefore, since the Project could potentially exceed the thresholds, it could potentially increase the frequency or severity of existing air quality violations or cause or contribute to new violations, or delay the timely attainment of air quality standards or the interim emissions reductions specified in the AQMP.

The EIR will evaluate the proposed Project for any impacts the proposed Project may have on the attainment of regional air quality objectives.

b) **Potentially Significant Impact.** Short-term air pollutant emissions would potentially occur during site preparation and construction activities associated with the proposed Project. Construction activities have the potential to generate fugitive dust, stationary-source emissions, and mobile-source emissions. Construction emissions can vary substantially from day to day, depending on the

level of activity, type of machinery in use, and for fugitive dust with the prevailing weather conditions.

In addition, the proposed Project would potentially generate long-term operation emissions. An air quality analysis will be conducted for the proposed Project to determine if the resulting short- or long-term emissions would exceed SCAQMD's regional significance thresholds. This issue will be analyzed further in the EIR.

- c) **Potentially Significant Impact.** A significant impact would occur if implementation of the proposed project resulted in a cumulative net increase in any criteria above the SCAQMD significance threshold. The SCAQMD's approach for assessing cumulative air quality impacts is based on the AQMP forecasts of attainment of ambient air quality standards (AAQS) as nonattainment for ozone (O<sub>3</sub>), coarse inhalable particulate matter (PM<sub>10</sub>), and fine inhalable particulate matter (PM<sub>2.5</sub>).<sup>36</sup> The SoCAB area is attainment for nitrogen oxides (NO<sub>x</sub>) (a California standard only). Under the National AAQS, the SoCAB area is designated as nonattainment for ozone O<sub>3</sub>, and fine inhalable particulate matter PM<sub>2.5</sub>, but is within the attainment parameters for coarse inhalable particulate matter (PM<sub>10</sub>)<sup>37</sup>. Construction of the proposed Project may increase existing levels of criteria pollutants and contribute to the nonattainment/attainment status for these criteria pollutants in the SoCAB. As mentioned above, short-term air pollutant emissions would occur during construction activities associated implementation of the proposed Project. In addition, the proposed Project would generate long-term operational emissions. An air quality analysis will be prepared to determine if implementation of the proposed Project results in a cumulatively considerable net increase in any criteria air pollutant. This issue will be analyzed further in the EIR.
- d) **Potentially Significant Impact.** Sensitive receptors in the Project area are defined as residential areas adjacent to the Project site, as well as students that will be

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<sup>36</sup> California Environmental Protection Agency Air Resources Board, National and State Area 2014 Designations, <http://www.arb.ca.gov/desig/adm/adm.htm>, accessed October 5, 2016.

<sup>37</sup> California Environmental Protection Agency Air Resources Board, National and State Area 2014 Designations, <http://www.arb.ca.gov/desig/adm/adm.htm>, accessed October 5, 2016.



present at the Roosevelt HS and Hollenbeck Middle School (MS) campuses. During construction, sensitive receptors could be exposed to a variety of airborne emissions including those from construction equipment. The proposed Project potentially would expose sensitive receptors to substantial pollutant concentrations during construction. An impact is significant if sensitive receptors are exposed to substantial pollutant concentrations such as toxic air contaminants (TACs) and CO concentrations. The EIR will evaluate the potential for the construction and operation of the proposed Project to exceed SCAQMD's localized significance thresholds (LSTs) in accordance with SCAQMD's guidance methodology, generate traffic that results in significant CO hotspots, or generate substantial TACs. This issue will be analyzed further in the EIR.

- e) **No Impact.** Land uses primarily associated with odorous emissions include waste transfer and recycling stations, wastewater treatment plants, landfills, composting operations, petroleum operations, food and byproduct processes, factories, and agricultural activities, such as livestock operations. The proposed Project does not include any of these types of land uses. In addition, the proposed Project would not be sited near any of these recognized sources of odors. Therefore, the Project would have no impact with respect to odors and no further analysis is needed.

Issues:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
IV. <b>BIOLOGICAL RESOURCES. Would the project:</b>				
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 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, 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"/>

	Issues:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
c)	Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d)	Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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"/>

The Program EIR included SCs for minimizing impacts to biological resources of the existing environment in areas where future projects would be implemented under the SUP. Applicable SCs related to biological resource impacts associated with the proposed Project are provided below.

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

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

- If the qualified biologist determines that a narrower buffer between the project activities and observed active nests is warranted, a written explanation as to why (e.g., species-specific information; ambient conditions and birds' habituation to them; and the terrain, vegetation, and birds' lines of sight between the project activities and the nest and foraging areas) shall be submitted to LAUSD 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 bed 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.

**Responses:**

**a-c, f) No Impact.** The Project site is located in an urbanized area in the Boyle Heights neighborhood of the City of Los Angeles. No known threatened, endangered, or rare species or their habitats, locally designated species, locally designated natural communities, riparian or wetland habitats exist on this Project site. The Project site is not within an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or similar plan. The Project site is neither within, nor proximate to, any Significant Ecological Area, Land Trust, or Conservation Plan.<sup>38</sup> No impact would occur from the proposed Project and no further analysis is needed.

**d) Less than Significant Impact.** The Project site does not contain any watercourse or greenbelt for wildlife movement. However, mature trees are located on the Project site, these trees have the potential for nesting sites for birds.

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<sup>38</sup> Los Angeles County Department of Regional Planning. 2015. *Figure 9.3, Significant Ecological Areas and Coastal Resource Areas Policy Map*. March 30, 2017.

The Migratory Bird Treaty Act of 1918 (MBTA) implements the United States' commitment to four treaties with Canada, Japan, Mexico, and Russia for the protection of shared migratory bird resources. The MBTA governs the taking, killing, possession, transportation, and importation of migratory birds, their eggs, parts, and nests. The US Fish and Wildlife Service administers permits to take migratory birds in accordance with the MBTA. Provisions of the MBTA are met by compliance with **SC-BIO-3** from the Program EIR and included above, which would ensure that if construction occurs during the breeding season, appropriate measures would be taken to avoid impacts to any nesting birds if found.

**SC-BIO-3:** If tree or building removal is required during nesting season, LAUSD shall either:

- Retain a qualified biologist to conduct an intensive nest search in all trees and buildings slated for removal before construction begins. If nest with young are found, the LAUSD shall not remove the trees until the young have fledged or the nest has been abandoned, or,
- Delay tree or building removal until September 1 to February 28 to ensure reproductive success for native and/or migratory species using the site for nesting.

With adherence to **SC-BIO-3**, impacts would be less than significant and no further analysis is required in the EIR.

- e) **Less than Significant Impact.** Implementation of the proposed Project would not conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.

A total of nine California sycamores (*Platanus racemosa*), a protected tree under City of Los Angeles' Protected Tree Ordinance, were identified in a tree survey conducted in November 2016.<sup>39</sup> Construction of the proposed Project may require the removal of street trees and trees on-site. The Project would include a landscape plan to offset the loss of trees on the Project site. Replacement trees will be planted at the appropriate size

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<sup>39</sup> Tree Survey for Roosevelt High School, conducted by S. McAllaster, ISA Certified Arborist, reviewed by Cy Carlberg, Registered Consulting Arborist #405, November 2016.

at maturity for the space, and will be selected from the LAUSD Approved Plant List.<sup>40</sup> In accordance with the City of Los Angeles' Protected Tree Ordinance, LAUSD will complete the City's tree removal permit process, or an equivalent process that provides the same level of protection as the City's Ordinance as appropriate. Therefore, impacts conflicting with local policies and ordinances, including tree protection ordinances, would be less than significant and no further analysis is required in the EIR.

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<sup>40</sup> LAUSD, LAUSD Approved Plants List, 2012, [http://www.laschools.org/documents/download/sustainability%2Fwater\\_conservation%2FCopy\\_of\\_Updated\\_Plant\\_List\\_2012.pdf](http://www.laschools.org/documents/download/sustainability%2Fwater_conservation%2FCopy_of_Updated_Plant_List_2012.pdf)

Issues:		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
V.	<b>CULTURAL RESOURCES. Would the project:</b>				
a)	Cause a substantial adverse change in the significance of a historical resource as defined in § 15064.5?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b)	Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 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 formal cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

The Program EIR included SCs for minimizing impacts to cultural resources of the existing environment in areas where future projects would be implemented under the SUP. Applicable SCs related to cultural resource impacts associated with the proposed Project are provided below.

**SC-CUL-13:** 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-17:** LAUSD shall determine whether it is feasible to prepare and implement a Phase III Data Recovery/Mitigation Program. A Phase III Data Recovery/Mitigation Program would be designed by a Qualified Archaeologist to recover a statistically valid sample of the archaeological remains and to document the site to a level where the impacts can be determined to be less than significant. All documentation shall be prepared in the standard format of the ARMR Guidelines, as prepared by the OHP. Once a Phase III Data Recovery/Mitigation Program is completed, an archaeological monitor shall be present on site to oversee the grading, demolition activities, and/or initial construction activities to ensure that construction proceeds in accordance with the adopted Phase III Data Recovery/Mitigation Program. The extent of the Phase III Data Recovery/Mitigation Program and the extent and duration of the archaeological monitoring program depend on site-specific factors.

**SC-CUL-18:** 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-19** LAUSD shall have a paleontological monitor on-call during construction activities. This monitor shall provide the construction crew(s) with a brief summary of the sensitivity, the rationale behind the need for protection of these resources, and information on the initial identification of paleontological resources. If paleontological resources are uncovered during construction, the on-call paleontologist shall be notified and afforded the necessary time and funds to recover, analyze, and curate the find(s). Subsequently, the monitor shall remain on site for the duration of the ground disturbances to ensure the protection of any other resources that may be in the area.

SC-CUL-20

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 ensure the protection of any other resources that may be in the area.

**Responses:**

- a) **Potentially Significant Impact.** A project that may cause a substantial adverse change in the significance of a historical resource is a project that may have a significant effect on the environment.<sup>41</sup> Section 15064.5 of the *State CEQA Guidelines* defines an historical resource as: (1) a resource listed in, or determined to be eligible by, the State Historical Resources Commission, for listing in the California Register of Historical Resources; (2) a resource listed in a local register of historical resources, or identified as significant in an historical resource survey meeting certain state guidelines; or (3) an object, building, structure, site, area, place, record or manuscript that a lead agency determines to be significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California, provided that the lead agency's determination is supported by substantial evidence in light of the whole record.

With nearly 100 years of history on the site, Roosevelt High School has served multiple generations of families in Boyle Heights and the school's campus has witnessed significant social and demographic shifts that reflect the community at large. Among those important points in its history is the period of spring 1968, when students at Roosevelt HS, along with four other LAUSD high schools (Lincoln, Garfield, Belmont, and Wilson), staged mass student walkouts, also known as "Blowouts" associated with community activism under the growing Chicano Civil Rights Movement, also known as

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<sup>41</sup> California Public Resources Code Section 21084.1

'El Movimiento.'<sup>42</sup> The *Draft Supplemental Historic Resource Evaluation Report* conducted by ASM Affiliates identified Roosevelt High School's campus as an historic district given the potential eligibility in criteria listed for the National Register of Historic Places and the California Register of Historical Resources. The study evaluated the Blowouts as a potentially significant event as well as the involvement of Sal Castro as a potentially significant person during the Blowouts.

To ensure that all possible impacts of the Project on historical resources are fully examined, an EIR will be completed that will analyze this threshold in detail.

- b) Less than Significant Impact.** Section 15064.5 of the *State CEQA Guidelines* defines significant archaeological resources as resources that meet the criteria for historical resources, as discussed above, or resources that constitute unique archaeological resources.

The Project site has been in use as a school facility since 1923, and has been subjected to past subsurface disturbance associated with excavation and grading activities associated with the construction of foundations for the existing school buildings and it is unlikely that undisturbed unique archeological resources exist on the Project site. Nevertheless, the unanticipated discovery of unique archeological resources is possible during earth moving and grading activities. However, based on the lack of previous resources on the site, the probability that archeological resources will be discovered is low. In addition, compliance with **SC-CUL-13**, **SC-CUL-17**, and **SC-CUL-18**, listed above, would require that upon discovery of an archeological resource: (1) construction activities in the immediate area of the find shall cease and LAUSD shall retain a qualified archaeologist to determine the significance of the find; (2) LAUSD shall determine if a Phase III Data Recovery/Mitigation Program is necessary; and (3) if the archeological resource is a Native American resource, work shall stop within a 30-foot radius of the discovery.

The Project would be subject to the numerous laws and regulations, cited below that require State, and local agencies to consider the effects of a proposed Project on potentially buried cultural resources. These laws and regulations stipulate a process for compliance, define the responsibilities of the various agencies proposing the action, and

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<sup>42</sup> ASM Affiliates, *Draft Supplemental Historic Resource Evaluation Report for Roosevelt Senior High School, Los Angeles, Los Angeles County, California, June 20, 2017.*

prescribe the relationship among other involved agencies. They provide guidance concerning analytical techniques and approaches to defining compliance measures where potentially significant impacts may occur, such that in the event that archaeological resources are uncovered on the Project site during grading, or other construction activities, the District must be notified immediately and work must stop within a 100-foot radius until a qualified archeologist to be approved by the District, has evaluated the find. Construction activity may continue unimpeded on other portions of the Project site. If the find is determined by the qualified archeologist to be a unique archeological resource, as defined by Section 21083.2 of the Public Resources Code, the Project site shall be treated in accordance with the provisions of Section 21083.2 of the Public Resources Code. If the find is determined not to be a unique archeological resource, no further action is necessary and construction may continue.

Implementation of these SCs as well compliance with the federal, State, and local regulations would ensure impacts to archaeological resources remain less than significant. No further analysis in the EIR is required.

- c) **Less than Significant Impact.** As discussed above, the Project site has been previously disturbed and, therefore, it is unlikely that undisturbed paleontological resources exist on the Project site. Any surficial paleontological resources, which may have existed at one time, have likely been unearthed or disturbed to accommodate building foundations, and shallow excavation, or surface grading, is unlikely to uncover any paleontological resources. Earth moving and grading activities could potentially exceed the depth of prior grading activities and therefore, unanticipated discovery of unique paleontological resources is possible. With implementation of **SC-CUL-19** and **SC-CUL-20** listed above, the potential impacts from the proposed Project on paleontological resources would be less than significant, and no further analysis is required.
- d) **Less than Significant Impact.** No formal cemetery exists on the Project site, or in the vicinity of the proposed Project. As the Project site has been subject to past subsurface disturbance associated with grading and foundations, it is unlikely that intact human remains are present beneath the site. However, the unanticipated discovery of intact human remains is possible. In the event of an unexpected disturbance, significant impacts to archaeological resources and human remains could occur. Implementation of

SC-CUL-18, listed above, would reduce potentially significant impacts to less than significant levels. No further analysis is required.

Issues:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>VI. GEOLOGY AND SOILS. Would the project:</b>				
a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
ii) Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
iii) Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
iv) Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

	Issues:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
c)	Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d)	Be located on expansive soil, as defined in Table 18.1 B of the Uniform Building Code (1994), 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"/>

The Program EIR included SCs for minimizing impacts resources related to geology and soils of the existing environment in areas where future projects would be implemented under the SUP. Applicable SCs related to geology and soil impacts associated with the proposed Project are provided below.

**SC-HWQ-2** Compliance Checklist for Stormwater Requirements at a Construction Site: 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 stormwater pollution to be specified in a SWPPP; and monitoring stormwater discharges to ensure that sedimentation of downstream waters remains within regulatory limits.

## Responses:

- a(i) No Impact.** The proposed Project is the renovation of an existing school site and does not include any activities that would exacerbate any existing conditions related to faults, fault rupture, ground shaking or landslides that would directly expose people, or structures, to the risk of loss, injury, or death due to rupture of a known earthquake fault. Fault rupture is the displacement that occurs along the surface of a fault during an earthquake. The Project site is located in the Eastside region of Los Angeles County. The closest known active fault to the site is Upper Elysian Park Fault, approximately 2.4 miles to the north. North of the Project site lies the Raymond Fault and the Hollywood fault, 6.0 and 6.5 miles east and west, respectively.<sup>43</sup> The Project site is not located within an Alquist-Priolo Fault-Rupture Hazard Zone.<sup>44</sup> As the proposed Project would not exacerbate any of these existing conditions, no impact would occur.
- a(ii) No Impact.** The Project site is located within the seismically active Southern California region, and, therefore, could be subject to moderate and possibly strong ground motion due to earthquakes. The Raymond Fault, located about 6.0 miles north of the Roosevelt HS, is the closest large, active fault. The Project will be constructed in accordance with CBC and DSA standards. The planned construction of the Project will also take recommendations and incorporate project design features from the Geotechnical Report<sup>45</sup> upon completion. As a public school, Roosevelt HS will have to comply with the California Code of Regulations Title 24 requirements and the California Geological Survey Checklist for Review of Geologic/Seismic Reports. As described above, the Project does not include any activities that would exacerbate an existing geologic condition. No impact would occur from the proposed Project.
- a(iii) No Impact.** Liquefaction is a seismic phenomenon in which loose, saturated, fine-grained granular soils behave similarly to a fluid when subjected to high intensity ground shaking. Liquefaction occurs when three general conditions exist: (1) shallow groundwater; (2) low-density, fine, clean sandy soils; and (3) high intensity ground motion. Studies indicate that saturated, loose and medium-dense, near-surface

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<sup>43</sup> Geotechnical Professionals, Inc., *Geotechnical Investigation, Proposed Roosevelt High School, Campus Modifications, 456 S. Mathews Street, Los Angeles, California*, June 14, 2015.

<sup>44</sup> Ibid.

<sup>45</sup> Geotechnical Professionals, Inc., *Geotechnical Investigation, Proposed Roosevelt High School, Campus Modifications, 456 S. Mathews Street, Los Angeles, California*, June 14, 2015.



cohesionless soils exhibit the highest liquefaction potential, while dry, dense, cohesionless soils and cohesive soils exhibit low to negligible liquefaction potential.<sup>46</sup>

Regulatory maps<sup>47</sup> indicate that the Project site is not in an area potentially affected by liquefaction. Further, the proposed renovation activities would not exacerbate existing liquefaction potential. No impact would occur from the proposed Project and no further analysis is required.

**a(iv) No Impact.** Landslides and other types of slope failures, such as lateral spreading, can result in areas with varying topography in the event of an earthquake. The site is not located within an area identified as having a potential for slope instability, nor in an area having a potential for seismic slope instability.<sup>48</sup> The Project does not include any activities that would result in the exacerbation of any existing landslide potential. No impact would occur from the proposed Project.

**b) Less than Significant Impact.** Erosion is the movement of rock and soil from place to place and is a natural process. Common agents of erosion in the vicinity of the Project area include wind and flowing water. Significant erosion typically occurs on steep slopes where stormwater and high winds can carry topsoil down hillsides. Erosion can be increased greatly by earthmoving activities if erosion-control measures are not used.

The Project site is located in an urban area of the City, with the Project site, and surrounding vicinity, being generally flat. No major slopes or bluffs are on, or adjacent to, the Project site. The proposed Project is an educational facility that will include landscaped and hardscaped area, and will not contain large amounts of exposed soil. Following the completion of construction, the potential for soil erosion or the loss of topsoil is expected to be extremely low.

Construction of the proposed Project would involve soil disturbance activities, including grading and demolition that will leave soil on the Project site exposed. Common means

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<sup>46</sup> California Department of Conservation. 2016. Available at: <http://maps.conservation.ca.gov/cgs/informationwarehouse/index.html?map=regulatorymaps>, accessed February 9, 2017.

<sup>47</sup> Geotechnical Professionals, Inc., *Geotechnical Investigation, Proposed Roosevelt High School, Campus Modifications, 456 S. Mathews Street, Los Angeles, California*, June 14, 2015.

<sup>48</sup> Geotechnical Professionals, Inc., *Geotechnical Investigation, Proposed Roosevelt High School, Campus Modifications, 456 S. Mathews Street, Los Angeles, California*, June 14, 2015.

of soil erosion include water, wind, and being tracked off-site by vehicles. These activities could result in soil erosion. However, the proposed Project would be subject to local and state codes and requirements for erosion control and grading during construction, including, but not limited to, grading permits and haul route approval from the City, which include requirements and standards designed to limit potential impacts to acceptable levels. In addition, the proposed Project would be required to comply with standard regulations, including South Coast Air Quality Management District Rule 402, which will reduce construction erosion impacts. Rule 402 requires dust suppression techniques be implemented to prevent dust and soil erosion from creating a nuisance off-site.

Additionally, the Construction General Permit (CGP) issued by the State Water Resources Control Board (SWRCB), effective July 1, 2010, regulates construction activities to minimize water pollution, including sediment. The proposed Project would be subject to National Pollution Discharge Elimination System (NPDES) permitting regulations, including the development and implementation of a Storm Water Pollution Prevention Plan (SWPPP). Construction contractors would be required to prepare and implement a SWPPP and associated best management practices (BMPs). Adherence to the BMPs in the SWPPP would reduce, prevent, or minimize soil erosion from project related grading and construction activities. In addition, the proposed Project would be subject to **SC-HWQ-2**, seen above.

Therefore, soil erosion impacts from grading and construction activities associated with construction and operation of the proposed Project would not occur and soil erosion impacts would be less than significant. No further analysis is required in the EIR.

- c) **Less than Significant Impact.** Potential impacts with regard to liquefaction and landslide potential are evaluated, above. Building improvements founded on collapsible soils may be damaged by sudden and often induced settlement when these soils are saturated after construction. Collapsible soils are typified by low values of dry unit weight and natural water content. The amount of settlement depends on the applied vertical stresses and the extent of wetting and available water. Published geologic maps<sup>49</sup> of the area indicated that the site is underlain by alluvial fans consisting of loam, clay loam, and clay. This soil

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<sup>49</sup> Geotechnical Professionals, Inc., *Geotechnical Investigation, Proposed Roosevelt High School, Campus Modifications, 456 S. Mathews Street, Los Angeles, California*, June 14, 2015.

is more resistant to liquefaction and as a result, the Project site is not in a liquefaction area. With proper design and construction in accordance with current engineering practices, the impacts would be less than significant and no further analysis is necessary.

- d) **Less than Significant Impact.** Expansive soils shrink, or swell, as the moisture content decreases or increases; the shrinking or swelling can shift, crack, or break structures built on such soils. Published geologic maps of the area indicated that the site is underlain by Holocene age alluvium consisting of poorly consolidated silty sand, sandy silt, sandy clay, and clay.<sup>50</sup> As stated above in **Section VI (c)**, all potential impact from soil quality would be reduced through compliance with proper design and construction practices. Therefore, impacts would be less than significant, and no further analysis is needed in the EIR.
- e) **No Impact.** The existing school is connected to the existing sewer. No septic tank use is proposed as part of the Project. No impact regarding the ability of the soil to support septic tanks will occur from the proposed Project.

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<sup>50</sup> Geotechnical Professionals, Inc., *Geotechnical Investigation, Proposed Roosevelt High School, Campus Modifications, 456 S. Mathews Street, Los Angeles, California*, June 14, 2015.

Issues:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>VII. GREENHOUSE GAS EMISSIONS.</b>				
<b>Would the project:</b>				
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"/>

The Program EIR included SCs for minimizing impacts related to greenhouse gas emissions to the existing environment in areas where future projects would be implemented under the SUP. Applicable SCs related to greenhouse gas emissions associated with the proposed Project are provided below.

**SC-USS-1 School Design Guide**

Construction and demolition waste shall be recycled to the maximum extent feasible. LAUSD has established a minimum non-hazardous construction and demolition debris recycling requirement of 75% by weight as defined in Specifications 01340, Construction & Demolition Waste Management.

**Guide Specifications 2004 – Section 01340, Construction & Demolition Waste Management.**

This section of the LAUSD Specifications includes procedures for preparation and implementation, including reporting and documentation, of a Waste Management Plan for reusing, recycling, salvage or disposal of non-hazardous waste materials generated during demolition and/or new construction (Construction & Demolition (C&D) Waste), to foster material recovery and re-use

and to minimize disposal in landfills. Requires the collection and separation of all C&D waste materials generated on-site, reuse or recycling on-site, transportation to approved recyclers or reuse organizations, or transportation to legally designated landfills, for the purpose of recycling salvaging and/or reusing a minimum of 75% of the C&D waste generated.

- SC-GHG-1** During school operation, LAUSD shall perform regular preventative maintenance on pumps, valves, piping, and tanks to minimize water loss.
- SC-GHG-2** LAUSD shall utilize automatic sprinkler 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 cooler months and rainy season.
- 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 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.

### ***Background***

Greenhouse gas (GHG) emissions refer to a group of emissions that are believed to affect global climate conditions. These gases trap heat in the atmosphere and the major concern is that increases in GHG emissions are causing global climate change. Global climate change is a change in the average weather on earth that can be measured by wind patterns, storms, precipitation and temperature. Although there is disagreement as to the speed of global warming and the extent of the impacts attributable to human activities, most agree that there is a direct link between increased emission of GHGs and long-term global temperature. What GHGs have in common is that they allow sunlight to enter the atmosphere, but trap a portion of the outward-bound infrared radiation and warm up the air. The process is similar to the effect a greenhouse has in raising the internal temperature, hence the name greenhouse gases. Both natural processes and human activities emit GHGs. The accumulation of GHGs in the atmosphere regulates the earth's temperature; however, it is the scientific consensus that emissions from human activities such as electricity generation and motor vehicle operations have elevated the concentration of GHGs in the atmosphere. This accumulation of GHGs has

contributed to an increase in the temperature of the earth's atmosphere and contributed to global climate change.

The principal GHGs are carbon dioxide (CO<sub>2</sub>), methane (CH<sub>4</sub>), nitrous oxide (N<sub>2</sub>O), sulfur hexafluoride (SF<sub>6</sub>), perfluorocarbons (PFCs), hydrofluorocarbons (HFCs), and water vapor (H<sub>2</sub>O). CO<sub>2</sub> is the reference gas for climate change because it is the predominant greenhouse gas emitted. To account for the varying warming potential of different GHGs, GHG emissions are often quantified and reported as CO<sub>2</sub> equivalents (CO<sub>2</sub>e).

According to the 2010 California Climate Action Team (CAT) Report, temperature increases arising from increased GHG emissions potentially could result in a variety of impacts to the people, economy, and environment of California associated with a projected increase in extreme conditions, with the severity of the impacts depending upon actual future emissions of GHGs and associated warming.

In 2005, in recognition of California's vulnerability to the effects of climate change, Governor Schwarzenegger established Executive Order S-3-05, which sets forth a series of target dates by which statewide emissions of GHG would be progressively reduced, as follows:

- By 2010, reduce GHG emissions to 2000 levels;
- By 2020, reduce GHG emissions to 1990 levels; and
- By 2050, reduce GHG emissions to 80 percent below 1990 levels.

In response to Executive Order S-3-05, the Secretary of Cal/EPA created the CAT, which, in March 2006, published the first CAT Report (2006 CAT Report). The 2006 CAT Report identified a recommended list of strategies that the State could pursue to reduce climate change GHG emissions. These are strategies that could be implemented by various State agencies to ensure that the Governor's targets are met and can be met with existing authority of the State agencies.

In 2006, California passed the California Global Warming Solutions Act of 2006 (Assembly Bill No. 32; California Health and Safety Code Division 25.5, Sections 38500, et seq., or AB 32), which requires the California Air Resources Board (ARB) to design and implement emission limits, regulations, and other measures, such that feasible and cost-effective statewide GHG emissions are reduced to 1990 levels by 2020.

As a central requirement of AB 32, the ARB was assigned the task of developing a Scoping Plan that outlines the State's strategy to achieve the 2020 GHG emissions limit. This Scoping Plan, which was developed by the ARB in coordination with the CAT, was published in October 2008. The Scoping Plan proposed a comprehensive set of actions designed to reduce overall GHG emissions in California, improve the environment, reduce the State's dependence on oil, diversify the State's energy sources, save energy, create new jobs, and enhance public health. An important component of the plan is a cap-and-trade program covering 85 percent of the State's emissions. Additional key recommendations of the Scoping Plan include strategies to enhance and expand proven cost-saving energy efficiency programs; implementation of California's clean cars standards; increases in the amount of clean and renewable energy used to power the State; and implementation of a low-carbon fuel standard that will make the fuels used in the State cleaner. Furthermore, the Scoping Plan also proposes full deployment of the California Solar Initiative, high-speed rail, water-related energy efficiency measures, and a range of regulations to reduce emissions from trucks and from ships docked in California ports. The Proposed Scoping Plan was approved by the ARB on December 11, 2008.

Because climate change is already affecting California and current emissions will continue to drive climate change in the coming decades, the need to adapt to the impacts of climate change is recognized by the State of California. The 2009 California Climate Adaptation Strategy Discussion Draft (the Strategy) begins what will be an ongoing process of adaptation, as directed by Governor Schwarzenegger's Executive Order S-13-08. The goals of the strategy are to analyze risks and vulnerabilities and identify strategies to reduce the risks. Once the strategies are identified and prioritized, government resources will be identified. Finally, the strategy includes identifying research needs and educating the public.

Climate change risks are evaluated using two distinct approaches: (1) projecting the amount of climate change that may occur using computer-based global climate models; and (2) assessing the natural or human system's ability to cope with and adapt to change by examining historical experience with climate variability, and extrapolating this to understand how the systems may respond to the additional impact of climate change. The major anticipated climate changes expected in the State of California include increases in temperature, decreases in precipitation, particularly as snowfall, and increases in sea level, as discussed above. These gradual changes will also lead to an increasing number of extreme events, such as heat waves, wildfires, droughts, and floods. This would impact public health, ocean and coast resources, water supply, agriculture, biodiversity, and the transportation and energy infrastructures.

Key preliminary adaptation recommendations included in the Strategy are as follows:

- Appointment of a Climate Adaptation Advisory Panel;
- Improved water management in anticipation of reduced water supplies, including a 20 percent reduction in per capita water use by 2020;
- Consideration of project alternatives that avoid significant new development in areas that cannot be adequately protected from flooding due to climate change;
- Preparation of agency-specific adaptation plans, guidance or criteria by September 2010;
- Consideration of climate change impacts for all significant State projects;
- Assessment of climate change impacts on emergency preparedness;
- Identification of key habitats and development of plans to minimize adverse effects from climate change;
- Development of guidance by the California Department of Public Health by September 2010 for use by local health departments to assess adaptation strategies;
- Amendment of Plans to assess climate change impacts and develop local risk reduction strategies by communities with General Plans and Local Coastal Plans; and
- Inclusion of climate change impact information into fire program planning by State firefighting agencies.

In August 2007, the Legislature adopted Senate Bill 97 (SB 97), which required the Governor's Office of Planning and Research (OPR) to prepare and transmit new CEQA guidelines for the mitigation of GHG emissions or the effects of GHG emissions to the Natural Resources Agency by July 1, 2009. On April 13, 2009, OPR submitted to the Secretary for Natural Resources its proposed amendments to the state CEQA Guidelines for GHGs, as required by Senate Bill 97. These proposed CEQA Guideline amendments provided guidance to public agencies regarding the analysis and mitigation of the effects of greenhouse gas emissions in draft CEQA documents. On December 31, 2009, the Natural Resources Agency transmitted the Adopted Amendments and the entire rule-making file to the Office of Administrative Law (OAL). On February 16, 2010, OAL approved the Adopted Amendments and filed them with the Secretary of State for inclusion in the California Code of Regulations. The Adopted Amendments became effective on March 18, 2010.



In the CEQA Guideline Amendments, a threshold of significance for GHG emissions was not specified, nor does it prescribe assessment methodologies or specific mitigation measures. Instead, the amendments encourage lead agencies to consider many factors in performing a CEQA analysis and rely on the lead agencies to make their own significance threshold determinations based upon substantial evidence. The CEQA Amendments also encourage public agencies to make use of programmatic mitigation plans and programs from which to tier when they perform individual project analyses.

There are several unique challenges to analyzing greenhouse gas emissions and climate change under CEQA, largely because of climate change's "global" nature. Typical CEQA analyses address local actions that have local – or, at most, regional – impacts, whereas climate change presents the considerable challenge of analyzing the relationship between local activities and the resulting potential, if any, for global environmental impacts. Most environmental analyses examine the "project-specific" impacts that a particular project is likely to generate. With regard to global warming, however, it is generally accepted that while the magnitude of global warming effects may be substantial, the GHG emissions from a single general development project would have no noticeable effect on global climate.

For GHG emissions and global warming, there is not, at this time, one established, universally agreed-upon "threshold of significance" by which to measure an impact. While the ARB published some draft thresholds several years ago, they were never adopted and the ARB recommended that local air districts and lead agencies adopt their own thresholds for GHG impacts.

The SCAQMD has published draft thresholds using a tiered approach. The draft approach as most recently updated in September 2010 is as follows:<sup>51</sup>

- **Tier 1:** Is the project exempt from further analysis under existing statutory or categorical exemptions? If yes, there is a presumption of less than significant impacts with respect to climate change.
- **Tier 2:** Is the project's GHG emission within the GHG budgets in an approved regional plan? (The plan must be consistent with *State CEQA Guidelines* §§15064(h)(3), 15125(d), or

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<sup>51</sup> South Coast Air Quality Management District, "Greenhouse Gases (GHG) CEQA Significance Thresholds Working Group Meeting #6". 2008. <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/ghg-significance-thresholds>, accessed October 4, 2017.

15152(s).) If yes, there is a presumption of less than significant impacts with respect to climate change.

- **Tier 3:** Is the project's incremental increase in GHG emissions below or mitigated to less than the significance screening level (10,000 metric tons of carbon dioxide equivalent [MTCO<sub>2</sub>e] per year for industrial projects; 3,500 MTCO<sub>2</sub>e for residential projects; 1,400 MTCO<sub>2</sub>e for commercial projects; 3,000 MTCO<sub>2</sub>e for mixed-use or all land use projects)? If yes, there is a presumption of less than significant impacts with respect to climate change.
- **Tier 4:** Does the project meet one of the following performance standards? If yes, there is a presumption of less than significant impacts with respect to climate change.
  - Option #1: Achieve some percentage reduction in GHG emissions from a base case scenario, including land use sector reductions from AB 32.
  - Option #2: For individual projects, achieve a project-level efficiency target of 4.8 MTCO<sub>2</sub>e per service population by 2020 or a target of 3.0 MTCO<sub>2</sub>e per service population by 2035. For plans, achieve a plan-level efficiency target of 6.6 MTCO<sub>2</sub>e per service population by 2020 or a target of 4.1 MTCO<sub>2</sub>e per service population by 2035.
- **Tier 5:** Does the project obtain offsets alone or in combination with the above to achieve the target significance screening level (offsets provided for 30-year project life, unless the project life is limited by permit, lease, or other legally binding conditions)? If yes, there is a presumption of less than significant impacts with respect to climate change. Otherwise, the project is significant.

The SCAQMD has not announced when or if, in light of recent CEQA case law, staff is expecting to present a finalized version of these thresholds to the Governing Board for consideration. The SCAQMD has adopted Rules 2700, 2701, and 2702 that address GHG reductions; however, these rules are currently applicable to boilers and process heaters, forestry, and manure management projects.

The Tier 3 thresholds are the most applicable to this Project. Tier 3 requires that a project's incremental increase in GHG emissions should be below or mitigated to less than the significance screening level. Proposed projects that do not exceed the thresholds would not be

considered to have a significant impact on the attainment of air quality goals and would, therefore, be considered consistent with the current air quality plan.

**Responses:**

- a) **Less than Significant Impact.** The proposed Project would not generate direct GHG emissions from new vehicle trips and onsite area sources as trips currently exist and no change in the number of seats is proposed. Additionally, no indirect emissions from off-site energy production required for on-site activities, water use, and waste disposal would be generated. The Program EIR estimated GHG emissions for Central Los Angeles High School No. 12. The analysis of Central Los Angeles High School No. 12 includes emissions from construction and operation as it was a new school. Central Los Angeles High School No. 12 was estimated to generate emissions from both the new buildings and new vehicle trips. Because there is no increase in the operational component of the proposed Project (i.e., no increase in vehicle trips), GHG emissions would be lower than those analyzed for Central Los Angeles High School No. 12. Further, because the square footage of the proposed Project is less than the square footage of the existing campus, combined with the fact that new facilities as part of the proposed Project would be required to comply with **SC-USS-1, SC-GHG-1, SC-GHG-2, SC-GHG-3, and SC-GHG-5**<sup>52</sup> there would be a slight net decrease in operational GHG emissions related to energy, waste, and water, as compared to existing conditions. **Table 2, GHG Emissions of an LAUSD School**, shows the total emissions generated from Central Los Angeles High School No. 12.

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<sup>52</sup> LAUSD Standard Conditions of Approval, adopted by the Board of Education in September 2015 as part of the 2015 School Upgrade Program EIR, as Appendix E, available online at <http://achieve.lausd.net/ceqa>

**Table 2**  
**GHG Emissions of an LAUSD School**

Central Los Angeles High School No. 12 <sup>1</sup>		
Source	MTCO <sub>2e</sub> /Year	Percent of Project Total
Area	0	0%
Energy	241	17%
Transportation	938	64%
Waste	227	16%
Water	39	1%
Amortized Construction Emissions <sup>2</sup>	30	2%
<b>Total</b>	<b>1,475</b>	<b>100%</b>
Proposed SCAQMD Bright-Line Screening Threshold	3,000 MTCO <sub>2e</sub>	NA
<b>Exceeds Proposed Bright-Line Screening Threshold?</b>	<b>No</b>	<b>NA</b>

Source: LAUSD School Upgrade Program EIR, June 2014, Table 5.7-4

Notes: The sum of the emissions does not equal 100 percent of the total emissions due to rounding.

<sup>1</sup> = Based on 55,361 building square feet of school facilities, capacity of 500 high school students, and 855 average daily trips generated

<sup>2</sup> = As construction emissions are short-term, they are amortized over 30 years per SCAQMD methodology<sup>53</sup>

As shown in **Table 2**, development of a new school would not exceed the proposed SCAQMD significance thresholds of 3,000 MTCO<sub>2e</sub>. As previously discussed, the proposed Project would involve the demolition of existing classrooms (262,103 square feet), and construction of the same number of classrooms, but at a lesser square footage (226,773 square feet). Additionally, the number of students in attendance would not change. Therefore, GHG emissions associated with the proposed Project are limited to amortized construction emissions, as there would be a net decrease in operational GHG emissions under the proposed Project. Therefore, total CO<sub>2e</sub> emissions would be lower than the 1,475 MTCO<sub>2e</sub> for Central Los Angeles High School No. 12 provided in **Table 2** and would be below the 3,000 MRCO<sub>2e</sub> threshold.

It is important to note that no individual project is large enough to single-handedly result in increased concentrations of GHG globally. GHGs are not necessarily confined

<sup>53</sup> South Coast Air Quality Management District, 2020 GHG CEQA Significance Thresholds Working Group Meeting 15

in a specific air basin, and are usually dispersed into the atmosphere. As such, it is important to analyze impacts cumulatively and not by a project-by-project basis. As previously discussed, the proposed Project would not increase capacity, and, therefore, would not contribute cumulatively to emissions of GHGs.

Therefore, the cumulative contribution to GHG emissions from the Project would be less than significant. No further analysis is required.

- b) Less than Significant Impact.** In response to concern regarding GHGs and global climate change, the State passed Assembly Bill 32 (AB 32) also known as the California Global Warming Solutions Act of 2006. AB 32 (Health and Safety Code Section 38500 et. Seq.) mandated a reduction in the state's GHG levels. AB 32 is the basis for reduction of GHG emissions in California. Local agencies such as the SCAQMD base their planning and regulations on the requirements included in AB 32, which include a reduction of GHG emissions to 1990 rates by 2020. The SCAQMD adopted the GHG significance thresholds specifically to meet AB 32 requirements within its jurisdiction, and so plans and projects that meet those thresholds can be assumed to meet the requirements of AB 32.

Senate Bill 32 (SB 32) was signed into law on August 31, 2016. This bill requires CARB to adopt rules and regulations to ensure that statewide GHG emissions are reduced to 40 percent below the 1990 level by 2030.

The Project site is within the jurisdiction of the SCAQMD. As the net emissions associated with the proposed Project would be well below the SCAQMD thresholds, the proposed Project would not conflict with plans, policies, or regulations for reducing GHG emissions. As a result, the proposed Project would not conflict with the State's ability to meet its GHG goals under AB 32 and SB 32.

In addition, Senate Bill 375 (SB 375) passed by the State of California in 2009, requires metropolitan regions to adopt transportation plans and sustainable communities strategies that reduce vehicle miles travelled. In accordance with SB 375, SCAG prepared and adopted the 2016 RTP/SCS with the primary goal of enhancing sustainability by increasing multi-modal transportation options, and identifying land use strategies that focus new housing and job growth in areas served by public transit. Additionally, the 2016 RTP/SCS reaffirms the 2008 Advisory Land Use Policies that were incorporated

into the 2012 RTP/SCS. The proposed Project is in use as a school and would upgrade the existing facilities to modern energy efficient standards. The proposed Project would not conflict with any plans, policies, or regulations adopted for the purpose of reducing GHG emissions.

Impacts would be less than significant and no further analysis is required.

Issues:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>VIII. HAZARDS AND HAZARDOUS MATERIALS. Would the project:</b>				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input 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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input 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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input 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"/>

	Issues:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
e)	For a project located within an airport land use plan or, where such a plan has not been adopted, within 2 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 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 checked="" type="checkbox"/>	<input type="checkbox"/>
h)	Expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>



	Issues:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
i)	Be located on a site that is (a) a current of former hazardous waste disposal site or solid waste disposal site and, if so, has the waste been removed; (b) a hazardous substance release site identified by the State Department of Health Services in a current list adopted pursuant to Section 25356 of Division 20 of the Health and Safety Code; or (c) a site that contains one or more pipelines, situated underground or above ground, which carries materials or hazardous wastes, unless the pipeline is a natural gas line which is used only to supply natural gas to that school or neighborhood?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
j)	Be located on a site where the property line less than the following distance from the edge of respective power line easement: <ul style="list-style-type: none"> <li>• 100 feet of a 50-133 kV line,</li> <li>• 150 feet of a 220-230 kV line, or</li> <li>• 350 feet of a 500-550 kV line?</li> </ul>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

	Issues:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
k)	Be located on a site that is within 1,500 feet of a railroad track easement?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
l)	Be located on a site that is adjacent or near to 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"/>
m)	Be located on a site that is near a reservoir, water storage tanks or high-pressure water lines?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
n)	Be located within 1,500 feet of a pipeline that may pose a safety hazard?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
o)	Be located on a site that does not have a proportionate length to width ratio to accommodate the building layout, parking and play fields that can be safely supervised?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
p)	Be located on a site where the existing or proposed zoning of the surrounding properties is incompatible with schools and may pose a health or safety risk to students?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
q)	Be located on a site that contains, or is near, propane tanks that can pose a safety hazard?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

	Issues:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
r)	Be located on a site with a traffic pattern for school buses that can pose a safety hazard?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
s)	Be located on a site that is within 2,000 feet of a significant disposal of hazardous waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

The Program EIR included SCs for minimizing impacts to the existing environment of hazards and hazardous materials where future projects would be implemented under the SUP. Applicable SCs related to hazards and hazardous materials associated with the proposed Project are provided below.

**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.

**Responses:**

**a) Potentially Significant Impact.**

***Construction***

A significant impact would occur if the proposed Project would create a significant hazard through the routine transfer, use, or disposal of hazardous materials. Construction of the proposed Project would involve the use of potentially hazardous materials, including vehicle fuels, oils, and transmission fluids. However, the transport, use, and disposal of construction-related hazardous materials would occur in conformance with all applicable local, state, and federal regulations governing such activities.

Approximately 7,019 cubic yards (cy) of soil containing COCs; specifically, arsenic, lead, petroleum hydrocarbons, at levels that exceed the District's cleanup goals would be removed from areas located throughout the Project site during construction<sup>54</sup>. Impacts related to the removal of this contaminated soil during construction would be potentially significant, and therefore, this topic will be analyzed further in an EIR.

### *Operation*

The proposed Project is an educational facility and would not involve the routine transport, storage, production, use, or disposal of hazardous materials or use of pressurized tanks during operation. Small amounts of pesticides may be stored for the maintenance of landscaped areas and limited quantities of custodial and maintenance products, including commercial cleansers, lubricants, and paints would also be stored on-site.

The design and operation of the proposed Project would satisfy all legal requirements by providing for and maintaining appropriate storage areas for hazardous materials, installing or affixing appropriate warning signs and labels, using commercial services that specialize in the recycling of used hazardous substances (i.e., collecting hazardous materials on a regular basis to minimize the quantity stored on campus), installing emergency wash areas for flushing irritating substances from eyes and exposed skin areas should such contact occur, providing well-ventilated areas in which to use paints and solvents, and maintaining adult supervision during student's use of hazardous materials. All hazardous materials would be contained, stored, and used in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations. Any associated risk would be adequately reduced to a less than significant level through compliance with these standards and regulations, and would not pose significant hazards to the public or the environment. Therefore, operational impacts related to the transport, use, or disposal of hazardous materials use would be less than significant. No further analysis is required.

- b) Potentially Significant Impact.** A significant impact would occur if the proposed Project created a significant hazard to the public, or environment, due to a reasonably foreseeable release of hazardous materials. Construction of the proposed Project would

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<sup>54</sup> TRC Solutions. June 27, 2017. Roosevelt High School: Revised Summary of Proposed Excavation Areas.

involve the use of potentially hazardous materials, including vehicle fuels, oils, and transmission fluids.

### *Construction*

As discussed in **Threshold VIII.a** above, approximately 7,019 cy of contaminated soil on the Project site would be removed during construction. The activities related to construction would potentially lead to the release of hazardous materials. Therefore, this issue will be further addressed in the EIR.

### *Operation*

The proposed Project would not create a hazard through upset or accident conditions involving hazardous materials. As discussed in **Threshold VIII.a** above, the use of hazardous materials and substances at school facilities during operations would be minimal and in small quantities. Additionally, all materials and substances would be subject to applicable health and safety requirements stipulated by LAUSD OEHS including Chemical Hygiene, Safe School Inspections, and Environmental Compliance Programs.<sup>55</sup> This would include affixing appropriate warning signs and labels, installing emergency wash areas, providing well-ventilated areas and special plumbing, and maintaining adult supervision. Compliance with existing regulations would result in no reasonably foreseeable upset or accident conditions that would create a significant hazard to the public due to the release of hazardous materials. Potential operation impacts related to hazardous materials would be less than significant. No further analysis is required.

- c) **Potentially Significant Impact.** There are six schools within a quarter-mile of the proposed Project site, including the Project site itself. Hollenbeck Middle School is directly across E. 6<sup>th</sup> Street, approximately 75 feet south of the Project site. Further south, approximately 1,200 feet southwest of Roosevelt HS is the SEA Charter School. To the east and northeast are the Our Lady of Talpa School (approximately 1,160 ft.) and First Street Elementary School (approximately 1,240 feet), respectively. Breed Street Elementary School, is about 1,250 feet northwest of the site.

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<sup>55</sup> Refer to OEHS Chemical Evaluation and Chemical Safety Coordinator programs online at <http://achieve.lausd.net/Page/2562>

### *Construction*

As discussed in **Threshold VIII.a** above, construction of the proposed Project would involve the removal of approximately 7,019 cy of contaminated soil on the Project site. There is the potential for accidental release of contaminants during construction, or during demolition of the remaining buildings on the Project site. Therefore, this issue will be further addressed in the EIR.

### *Operation*

As the proposed Project is a school, impacts could occur if hazardous materials were released on the Project site during operation. Operation of the proposed Project may require a limited quantity of hazardous materials (e.g., for landscaping, custodial, and educational purposes) be stored on the Project site.

Examples of such materials could include, but are not limited to, cleaning solvents, pesticides and herbicides for landscaping, and painting supplies. All potentially hazardous materials transported, stored, or used on site for daily upkeep will be contained, stored, and used in accordance with manufacturers' instructions and handled in compliance with applicable regulations set forth by LAUSD Office of Environmental Health and Safety (OEHS) including Chemical Hygiene, Safe School Inspections, and Environmental Compliance Programs.<sup>56</sup>

Further, procedures for the systematic evacuation of students from classrooms and other school facilities are established and practiced by the LAUSD at all schools. Each school's Safe School Plan describes procedures to be followed in the event of a biological or chemical release.

Compliance with applicable laws, regulations, and standard LAUSD policies and practices during Project operation would ensure that impacts associated with upset or accidental conditions which could cause a release of hazardous materials are less than significant, and no further analysis is necessary.

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<sup>56</sup> Refer to OEHS Chemical Evaluation and Chemical Safety Coordinator programs online at <http://achieve.lausd.net/Page/2562>

- d) **Less than Significant Impact.** The proposed Project is not located on a site that is included on a list of hazardous materials pursuant to Government Code 65962.5, which is the Hazardous Waste and Substances (Cortese) List.<sup>57</sup> A review of the Cortese List compiled on the Department of Toxic Substances Control, the State Water Board, and CAL EPA showed that the site is not identified on any of these database lists.<sup>58</sup> The Project site is currently in use as a school and has been in use as a school since 1923. Potential impacts would be less than significant, and no further analysis is required in the EIR.
- e-f) **No Impact.** The proposed Project would not result in safety hazards regarding airports and airplanes. The Project site is not located within an airport safety zone. The nearest airports are the El Monte Airport, 11.06 miles to the northeast and the Hawthorne Muni Airport, approximately 11.5 miles southwest of Roosevelt HS. There is also the Jay Stephen Hooper Memorial Heliport 1.5 miles northwest of the Project site. No impact would occur from the proposed Project and no further analysis is needed.
- g) **Less than Significant Impact.** The Project is not anticipated to interfere with an emergency response plan or evacuation plan. As stated in the Program EIR, district schools are required to comply with the California Education Code Sections 32281-32289 dealing with the preparation of “Safe School Plans.” These plans help develop an emergency response protocol during an emergency on a District site, including renovation, modification work, and contracted work. As required by **SC-T-4** listed above, a Construction Traffic Plan would be submitted to the City for review and approval.

The Construction Traffic Plan would detail haul routes, potential lane closures and construction hours. Advance notice of the construction timing and phasing will allow the City to appropriately plan for lane closures, etc. Implementation of **SC-T-4** would ensure impacts related to emergency response would be less than significant.

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<sup>57</sup> California State Water Resources Control Board. 2015. *GeoTracker*. Available at: <https://geotracker.waterboards.ca.gov/map/>, accessed February 17, 2017.

<sup>58</sup> California Department of Toxic Substances Control. *EnviroStor*. Available at: [http://www.envirostor.dtsc.ca.gov/public/search.asp?cmd=search&reporttype=CORTESE&site\\_type=CSITES,OPEN,FUDS,CLOSE&status=ACT,BKLG,COM&reporttitle=HAZARDOUS+WASTE+AND+SUBSTANCES+SITE+LIST](http://www.envirostor.dtsc.ca.gov/public/search.asp?cmd=search&reporttype=CORTESE&site_type=CSITES,OPEN,FUDS,CLOSE&status=ACT,BKLG,COM&reporttitle=HAZARDOUS+WASTE+AND+SUBSTANCES+SITE+LIST)

LAUSD has developed a district-wide Emergency Operation Plan (EOP) that addresses the District's responsibilities in emergencies such as natural disaster, human-caused emergencies, and technological incidents.<sup>59</sup> The EOP provides a framework for coordination of response and recovery efforts within the District in coordination with local, State, and federal agencies. The EOP meets the requirements of Los Angeles County's policies on emergency response and planning and the Standardized Emergency Management System (SEMS) operations area response. Based on LAUSD's standard plans and procedures related to emergency response, impacts to existing emergency response plans and/or evacuation plans/routes would be less than significant and no further analysis in the EIR is necessary.

- h) Less than Significant Impact.** The proposed Project would not expose people or structures to a substantial risk of wildland fires. The Project site is located in a developed, residential area of the City of Los Angeles, and is not within a Very High Fire Hazard Severity Zone.

**The Program EIR includes the following Thresholds:**

*California Department of Education Thresholds*

Title 5 of the California Code of Regulation Section 14010 incorporates health and safety factors provided in the California Department of Education's (CDE) School Site Selection and Approval Guide. In combination with the thresholds provided in the State CEQA Guidelines, these thresholds (**Thresholds VIII.i** through **VIII.s**, below) ensure that schools provide a safe learning environment for students. It is important to note that these following thresholds are tied to site acquisition. As LAUSD already owns the Project site, CDE thresholds will be analyzed on whether the proposed Project would

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<sup>59</sup> LAUSD. 2010. *Emergency Operations Plan*. April.



exacerbate existing conditions in accordance with the ruling in *CBIA v. BAAQMD*.<sup>60</sup> The following discussions provide analysis of the CDE school site safety thresholds.

- i) **Less than Significant Impact.** The State Department of Health Services has not identified the Project site as a hazardous substance release site, nor does the site contain one or more pipelines which transport hazardous waste.<sup>61</sup> There is such a pipeline directly north of the site, running beneath E. 4<sup>th</sup> St. before running along S. Fickett St. The Project site has not been used as a hazardous waste disposal site. Impacts related to being located on a hazardous materials disposal site would be less than significant. No further analysis is required in the EIR.
- j) **Less than Significant Impact.** The Project site is not expected to create any new significant safety hazards or exacerbate any existing safety hazards to students from high voltage powerlines or electromagnetic fields within 350 feet of the Project site. No high-voltage power lines were observed within 350 feet. No impact would occur from the proposed Project, and no further analysis is needed in the EIR.
- k) **No Impact.** The Project site is not located within 1,500 feet of a railroad track easement. Therefore, a Rail Safety Study is not required pursuant to SC-HAZ-3, which requires that new classrooms or outdoor play areas within 1,500 feet of a railroad track easement must be evaluated to determine if there would be an unreasonable safety hazard to students and staff at the school. No impact would occur from the proposed Project and no further analysis is required.
- l) **Less than Significant Impact.** The Project site is located in an urban area. S. Soto St. and E. 4<sup>th</sup> St. are arterial roadways, located less than 500 feet west and immediately north of the site, respectively. Although the Project site is located near major highways and arterial roadways, the proximity of such roads would not pose an immediate safety

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<sup>60</sup> *California Building Industry Association v. Bay Area Air Quality Management District* (Aug. 12, 2016) 2 Cal.App.5<sup>th</sup> 1057 decided that CEQA does not apply to the impacts of the environment on a project, with some specific exceptions. One circumstance that sensitive receptors thresholds can be valid would be to school projects stating, "Given the confluence of purpose between measuring environmental significance as contemplated by the Receptor Thresholds, and measuring risks to human health as contemplated by the CEQA requirements for siting a new school, the levels of air pollution described by the Receptor Thresholds could be used by a school district to assess the health risk to students and employees at a proposed school site."

<sup>61</sup> National Pipeline Mapping System. 2017. *NPMS Public Map Viewer*. Available at: <https://www.npms.phmsa.dot.gov/PublicViewer/>, accessed February 21, 2017.

hazard to students and staff accessing the Project site. No further analysis is required in the EIR. However, a traffic study that includes analysis of existing roadway hazards and pedestrian safety issues has been prepared for the proposed Project, and is further discussed below in Section XIII Pedestrian Safety.

- m) **No Impact.** Pursuant to CCR, Title 5, Section 14010(h), a school site shall not be located near an aboveground water tank that can pose a safety hazard, as determined by a risk analysis study conducted by a competent professional. The CDE *School Site Selection and Approval Guide* (2000) extends the regulatory protection for hazardous substance pipelines to high-pressure water lines within 1,500 feet of a school site.

No known infrastructure, including water storage tanks, reservoirs, and/or high-pressure water lines are located near the Project site. Therefore, no impact would occur from the proposed Project and no further analysis is necessary in the EIR.

- n) **Potentially Significant Impact.** Pursuant to CEC Section 17213(a)(3), a school district shall not approve a Project involving the acquisition of a school site that contains one or more aboveground or underground pipelines that carry hazardous substances, acutely hazardous materials, or hazardous wastes, unless the pipeline is a natural gas line that is used only to supply natural gas to that school or neighborhood. Under CCR, Title 5, Section 14010(h) the school site shall not be located near a fuel storage tank or within 1,500 feet from the easement of an aboveground or underground pipeline that can pose a safety hazard, as determined by a risk analysis study conducted by a competent professional, which may include certification from a local public utility commission. In addition, LAUSD has guidelines for Pipeline Safety Hazard Assessments for existing schools located within 1,500 feet of high pressure natural gas pipelines.<sup>62</sup>

No pipelines are located on the Project site. A gas transmission line owned by Sempra Energy is located adjacent to the northeast along 4th Street and diverts further north to South Fickett Street. According to information from the Sempra Energy website, this pipeline is generally equipped with a larger diameter and operates at pressures above 200 psi. This pipeline transports gas from supply points to the gas transmission system.<sup>63</sup>

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<sup>62</sup> LAUSD Office of Environmental Health and Safety. *User Manual: Pipeline Safety Hazard Assessment*. March 2005, with updates.

<sup>63</sup> Converse Consultants, *Phase I Environmental Site Assessment Report, Theodore Roosevelt High School, 456 South Mathews Street, Los Angeles, California 90033*, August, 30, 2016.

The Project site has been in use as a school since 1923, very likely well before the gas line was put in place. The renovation of the existing school site would not expose new students to an existing hazard, as there is no change in student population proposed. However, due to its proximity to the Roosevelt HS, this issue will be further addressed in the EIR.

- o) No Impact.** The 22.7-acre Project site is rectangular in shape. The Project site is not unusually shaped and has a sufficient length to width ratio that is consistent with CDE standards for school sites, which state that the length-to-width should not exceed 2:1. As illustrated in the Project description, the proposed structures, parking, and play areas could be accommodated within the Project site. Therefore, no impact would occur from the proposed Project and no further analysis is necessary in the EIR.
- p) No Impact.** The Project site is located within a primarily residential neighborhood in the community of Boyle Heights. The parcel is currently zoned PF. As such, no change would occur to land use and the proposed Project would be sited on an existing school property. Therefore, no adverse impacts to student health or safety would occur as a result of surrounding development, and no further analysis is necessary in the EIR.
- q) Less than Significant Impact.** Although no propane tanks are known to be located on the Project site, propane tanks could be present in home dwellings, immediately adjacent to the Project site. Rules and regulations pertaining to the storage, transportation, and use of propane would ensure that all propane tanks would not pose a safety hazard to individuals on the Project site. Impacts would be less than significant, and no further analysis is required.
- r) Less than Significant Impact.** Operation of the proposed Project would result in the same vehicle, pedestrian, bicycle, school bus, and public transit trips as Roosevelt HS generates currently, as facilities will only be renewed and replaced and no addition of new students is anticipated. Project related construction activities would only temporarily increase vehicle trips on nearby roadways.

Individual projects would include the use of standard design and engineering practices, such as standard driveway widths and turning radii and provision of adequate line of sight to avoid design elements that could result in hazards. Implementation of LAUSD OEHS CEQA Specification Manual, Appendix C, Traffic and Pedestrian Safety

Requirements for New Schools and the School Design Guide, require that bus loading areas do not overlap with car loading areas, which would reduce the potential for conflicts between cars and buses arriving and departing, especially during peak periods.

Under the Design Guide, Section 2.3 LAUSD will:

- Ensure adequate and safe access for students, staff and visitors walking, entering and circulating on the campus. Vehicle traffic patterns shall not interfere with major pedestrian traffic patterns. Foot traffic shall not pass through entrance driveways.
- Provide safe and clearly indicated student pick-up and drop-off provisions by car and bus.
- Delivery and utility vehicles shall have direct access from the street without crossing playgrounds or fields.

As such, implementation of standard LAUSD conditions regarding pick-up and drop-off operations would reduce potential safety hazards regarding buses. Impacts would be less than significant, and no further analysis is necessary.

- s) **Less than Significant Impact.** The nearest hazardous waste disposal site is approximately 1.6 miles southwest of the site at the S.A.F.E. Center location on Washington Boulevard.<sup>64</sup> No known hazardous waste sites or facilities that dispose of significant quantities of hazardous materials are known to exist within 2,000 feet as the Project site is predominantly surrounded by residential uses. Further, a review of the Cortese List compiled on the Department of Toxic Substances Control, the State Water Board, and CAL EPA showed that the site is not located near any sites identified on any of these database lists.<sup>65</sup> Impacts would be less than significant, and no further analysis is necessary.

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<sup>64</sup> City of Los Angeles Sanitation (LASAN); [https://www.lacitysan.org/san/faces/wcnav\\_externalId/s-lsh-wwd-s-c-hw-safemcjsessionid=aW\\_zBsc1\\_CfB52iHf1ALHBZqv7oFPjd4WQV7Gm8Ou4GUmobaixb!-714959136!-1416067313?\\_afLoop=1726976593733206&\\_afWindowMode=0&\\_afWindowId=null#!%40%40%3F\\_afWindowId%3Dnull%26\\_afLoop%3D1726976593733206%26\\_afWindowMode%3D0%26\\_adf.ctrl-state%3D16uw62lqxx\\_4](https://www.lacitysan.org/san/faces/wcnav_externalId/s-lsh-wwd-s-c-hw-safemcjsessionid=aW_zBsc1_CfB52iHf1ALHBZqv7oFPjd4WQV7Gm8Ou4GUmobaixb!-714959136!-1416067313?_afLoop=1726976593733206&_afWindowMode=0&_afWindowId=null#!%40%40%3F_afWindowId%3Dnull%26_afLoop%3D1726976593733206%26_afWindowMode%3D0%26_adf.ctrl-state%3D16uw62lqxx_4), accessed October 3, 2017.

<sup>65</sup> California Department of Toxic Substances Control. *EnviroStor*. Available at: [http://www.envirostor.dtsc.ca.gov/public/search.asp?cmd=search&reporttype=CORTESE&site\\_type=CSITES,OPEN,FUDS,CLOSE&status=ACT,BKLG,COM&reporttitle=HAZARDOUS+WASTE+AND+SUBSTANCES+SITE+LIST](http://www.envirostor.dtsc.ca.gov/public/search.asp?cmd=search&reporttype=CORTESE&site_type=CSITES,OPEN,FUDS,CLOSE&status=ACT,BKLG,COM&reporttitle=HAZARDOUS+WASTE+AND+SUBSTANCES+SITE+LIST)

Issues:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>IX. HYDROLOGY AND WATER QUALITY. Would the project:</b>				
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 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)?	<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"/>

	Issues:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
d)	Substantially alter the existing drainage pattern of the site or area, including through alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on-or-off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e)	Create or contribute runoff water which would exceed the capacity of existing 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 checked="" type="checkbox"/>	<input type="checkbox"/>
h)	Place within a 100-year flood hazard areas structures which would impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

	<b>Issues:</b>	<b>Potentially Significant Impact</b>	<b>Less Than Significant With Mitigation Incorporated</b>	<b>Less Than Significant Impact</b>	<b>No Impact</b>
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)	Expose people or structures to a significant risk of loss, injury or death involving inundation by seiche, tsunami, or mudflow?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The Program EIR included SCs for minimizing impacts to hydrology and water quality of the existing environment in areas where future projects would be implemented under the SUP. Applicable SCs related to hydrology and water quality impacts associated with the proposed Project are provided below.

**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). While these guidelines meet current post-construction SUSMP requirements. The guidelines address the mandated post-construction element of the NPDES program requirements.

**SC-HWQ-2** Compliance Checklist for Stormwater Requirements at a Construction Site: 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 stormwater pollution to be specified in a SWPPP; and monitoring stormwater discharges to ensure that sedimentation of downstream waters remains within regulatory limits.

**SC-HWQ-3:** During construction and operation, miscellaneous requirements include:

- Environmental Training Curriculum
- Hazardous Waste Management Program
- Medical Waste Management Program
- Environmental Compliance Inspections
- Safe School Inspections
- Integrated Pest Management Program
- Fats Oil and Grease Management Program
- Solid Waste Management Program

**SC-HWQ-4:** The analysis for new projects shall include evaluation of all possible flood hazards as determined by: (1) review of FEMA flood maps; (2) review of flood information provided by local city or county floodplain managers; (3) review of California Department of Water Resources dam safety information; and (4) local drainage analysis by a civil engineer. The flood hazard determination shall include consideration of tsunamis and debris flow. New projects should be located outside of these hazard areas, if practical.

**SC-HWQ-5:** Where placing the project outside the floodplain is impractical, the school or project structure shall be protected from flooding by containment and control of flood flows (e.g., elevating lowest floors at least one foot above the expected 100-year flood level).

**Responses:**

- a) **Less than Significant Impact.** As part of Section 402 of the Clean Water Act, the United States Environmental Protection Agency (EPA) has established regulations under the National Pollution Discharge Elimination System (NPDES) program to control direct stormwater discharges. In California, the State Water Resources Board (SWRCB) administers the NPDES permitting program and is responsible for developing NPDES permitting requirements. The NPDES program regulates industrial pollutant discharges, which include construction activities. The SWRCB works in coordination with the



Regional Water Quality Control Board (RWQCB) to preserve, protect, enhance, and restore water quality.

A project would normally have a significant impact on surface water quality if discharges associated with a project will create pollution, contamination, or nuisance as defined in Section 13050 of the California Water Code (CWC) or that cause regulatory standards to be violated, as defined in the applicable NPDES stormwater permit or Water Quality Control Plan for the receiving water body. For the purpose of this specific issue, a significant impact may occur if a project will discharge water which does not meet the quality standards of agencies which regulate surface water quality and water discharge into stormwater drainage systems. Significant impacts will also occur if a project does not comply with all applicable regulations with regard to surface water quality as governed by the SWRCB. These regulations include compliance with the Standard Urban Storm Water Mitigation Plan (SUSMP) requirements to reduce potential water quality impacts.

As required under the NPDES, the proposed Project would be responsible for the preparation of a SWPPP and implementation of BMPs to mitigate the effects of erosion and the inherent potential for sedimentation and other pollutants entering the stormwater system. The proposed Project would also be subject to **SC-HWQ-1** and **SC-HWQ-2**, seen above.

Implementation of a SWPPP and compliance with NPDES and City discharge requirements will ensure that the construction of the proposed Project would not violate any water quality standards and discharge requirements, or otherwise substantially degrade water quality. Thus, construction related ground disturbance activities as well as operation activities would not result in significant impacts to water quality. Therefore, water quality impacts would be less than significant and no further analysis is required.

- b) Less than Significant Impact.** A significant impact would occur if the proposed Project substantially depleted groundwater or interfered with groundwater recharge.

The Project site is already the location of Roosevelt HS and the Project entails the demolition and replacement of existing buildings. Build out of the proposed Project would not create substantially more impermeable surfaces such that groundwater

recharge would be affected. In fact, the proposed Project would include new landscaped areas, which could allow more percolation of rainwater to groundwater, as well as opportunities for newer technologies such as permeable pavement, bioswales and similar features.

Furthermore, groundwater levels in the City are maintained through the City and specific recharge basins. The Project site is not identified as an opportunity for groundwater recharge activities.<sup>66</sup> Additionally, no groundwater production wells are located in the vicinity of the project site, nor is the proposed Project growth inducing. Therefore, impacts related to groundwater recharge would be less than significant and no further evaluation is required.

- c) **Less than Significant Impact.** A significant impact would occur if the proposed Project substantially alters the drainage pattern of the site or an existing stream or river, so that substantial erosion or siltation would result on- or off-site. No stream or river is present on the Project site. The topography of the Project site is relatively level. Very little change would occur to the drainage pattern on the Project site with development of the proposed Project, as the Project site is already established.

During construction, erosion and siltation from the Project site could increase as a result of soil disturbance from surface grading and limited excavation. Construction-related activities that expose soils to potential mobilization by rainfall/runoff and wind are primarily responsible for sediment releases. Such activities include removal of vegetation, grading and trenching of the site. Environmental factors that affect erosion include topographic, soil, and rainfall characteristics. Unless adequate erosion controls are installed and maintained at the site during construction, significant quantities of sediment may be delivered from the concrete channel and discharged into the Pacific Ocean. As required by **SC-HWQ-2** detailed above, the construction contractor would be required to prepare a SWPPP and implement BMPs to prevent sediment flows from entering storm drainage systems by constructing temporary filter inlets around existing storm drain inlets prior to the stabilization of the construction site area. Specific BMPs will be detailed in the SWPPP. As such, impacts would be less than significant and no further analysis is required.

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<sup>66</sup> Environmental Protection Agency (EPA). 2016. *Pacific Southwest Region 9, Designated Sole Source Aquifers*. Available at: <https://www3.epa.gov/region9/water/groundwater/ssa.html>, accessed February 21, 2017

- d) **Less than Significant Impact.** A significant impact would occur if the proposed Project substantially altered the drainage pattern of an existing stream or river so that flooding would result. No streams or rivers exist on the project site.

As required by **SC-HWQ-1** detailed above, an NPDES stormwater permit application shall be submitted and the effluent quality criteria shall be specified in the permit, as determined by the Los Angeles RWQCB based on water guidelines. Monitoring of the outflow from the collection system may be required in the permit to ensure that the requirements and water quality criteria specified by the permit are achieved. The contractor shall use reclaimed water during the construction process, specifically for dust control, soil compaction, and concrete mixing to the extent feasible. In addition, the Project would comply with **SC-HWQ-1** through **SC-HWQ-5** seen above.

Compliance with **SC-HWQ-1** through **SC-HWQ-5** would ensure alteration of existing drainage patterns resulting in flooding would not occur. Impacts would be less than significant and no further analysis is required.

- e) **Less than Significant Impact.** A significant impact would occur if runoff water exceeded the capacity of existing or planned storm drain systems serving the Project site. A Project-related significant impact would also occur if the Project would substantially increase the probability that polluted run-off would reach the storm drain system.

There are three general sources of potential short-term construction-related stormwater pollution associated with the proposed Project.

1) The handling, storage, and disposal of construction materials containing pollutants. Generally, routine safety precautions for handling and storing construction materials effectively mitigate the potential pollution of stormwater by these materials. These same types of common sense, "good housekeeping" procedures, or BMPs, can be extended to non-hazardous stormwater pollutants such as sawdust and other solid wastes.

2) The maintenance and operation of construction equipment. Poorly maintained vehicles and heavy equipment leaking fuel, oil, antifreeze or other fluids on the construction site are also common sources of stormwater pollution and soil contamination.

3) Ground-disturbing activities (e.g., grading, excavation, etc.) which when not controlled, may generate soil erosion and/or loss of top soil via storm runoff or mechanical equipment. Grading activities can greatly increase erosion processes. Two general strategies are recommended to prevent construction silt from entering local storm drains. First, erosion control procedures should be implemented for those areas that must be exposed. Secondly, the area should be secured to control off-site migration of pollutants. During construction, the District shall be required to implement all applicable and mandatory BMPs in accordance with the SWPPP as required by **SC-HQW-2**. When properly designed and implemented, these "good-housekeeping" practices are expected to reduce short-term construction-related impacts to a less than significant level.

Activities associated with operation of the proposed Project would generate substances that could degrade the quality of water run-off. The deposition of certain chemicals by cars in the surface parking lot could have the potential to contribute metals, oil and grease, solvents, phosphates, hydrocarbons, and suspended solids to the storm drain system.

However, as mentioned in **Thresholds IX .a)** and **IX.b)**, impacts to water quality would be reduced since the proposed Project must comply with water quality standards and wastewater discharge BMPs set forth by the SWRCB and through **SC-HQW-1** through **SC-HQW-5**. In addition, LAUSD's construction contractor would prevent sediment flows and other pollutants from entering storm drain systems through trapping particles in temporary filter drain inlets. Storm drain improvements onsite shall provide capacity to carry 25-year peak runoff rates in case of additional stormwater. Compliance with existing regulations would reduce the potential for the proposed Project to exceed the capacity of existing or planned stormwater drainage systems, or provide substantial additional sources of polluted runoff impacts to a less than significant level. Impacts would be less than significant. No further analysis is required.

- f) **Less than Significant Impact.** A significant impact would occur if the proposed Project would substantially degrade water quality. Other than the sources discussed above, the Project does not include other potential sources of contaminants which could potentially degrade water quality. Therefore, Project impacts related to operational water quality would be less than significant and no further analysis is required.

- g-h) Less than Significant Impact.** The Federal Emergency Management Agency (FEMA) prepares and maintains Flood Insurance Rate Maps (FIRMs), which show the extent of Special Flood Hazard Areas (SFHAs) and other thematic features related to flood risk. The Project site is located in an area of minimal flood risk (Zone X) and is not located within a 100-year flood zone, as mapped by FEMA.<sup>67</sup> Further, in accordance with *CBIA v. BAAQMD*<sup>68</sup> the Project would not exacerbate an existing flood hazard as it would include the renovation of an existing school. Impacts would be less than significant and no further analysis is required.
- i) Less than Significant Impact.** As discussed above, the Project site would not expose people or structures to significant risk including injury or death as a result of flooding. Furthermore, the Project site and the neighborhood of Boyle Heights are not located within a potential inundation area as identified by the City's General Plan Safety Element<sup>69</sup>, and in accordance with *CBIA v. BAAQMD*<sup>70</sup> the proposed Project would not exacerbate any existing potential for flooding as a result of the failure of a levee or dam. No impact would occur from the proposed Project and no further analysis is required.
- j) No Impact.** A significant impact would occur if the proposed Project exacerbated an existing hazard such as inundation by seiche, tsunami, or mudflow. A seiche is an oscillation of a body of water in an enclosed or semi-enclosed basin, such as a reservoir, harbor, or lake. A tsunami is a great sea wave produced by a significant undersea disturbance. Mudflows result from the downslope movement of soil and/or rock under the influence of gravity. The Project site is not mapped within a tsunami hazard zone.<sup>71</sup> Similarly, damage to the Project site due to a seiche is not likely at the Project site because no bodies of water are present near the site. Furthermore, the project site, which is not positioned downslope from any unprotected slopes or landslide areas, and is not

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<sup>67</sup> FEMA's Flood Map Service Center, Panel 06037C16375F, accessed 2/21/2017.

<sup>68</sup> *California Building Industry Association v. Bay Area Air Quality Management District* (Aug. 12, 2016) 2 Cal.App.5th 1057 decided that CEQA does not apply to the impacts of the environment on a project, with some specific exceptions. One circumstances that sensitive receptors thresholds can be valid would be to school projects stating, "Given the confluence of purpose between measuring environmental significance as contemplated by the Receptor Thresholds, and measuring risks to human health as contemplated by the CEQA requirements for siting a new school, the levels of air pollution described by the Receptor Thresholds could be used by a school district to assess the health risk to students and employees at a proposed school site."

<sup>69</sup> City of Los Angeles Department of City Planning. 1996. *General Plan Safety Element, Exhibit G*. November.

<sup>70</sup> Op Cit.

<sup>71</sup> City of Los Angeles Department of City Planning. 1996. *General Plan Safety Element, Exhibit G*. November.

positioned in an area of potential mudflow. The Project would not exacerbate any existing hazard condition. Therefore, no impact related to inundation by seiche, tsunami, or mudflow would occur, and no further analysis is required.

Issues:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>X. LAND USE AND PLANNING.</b>				
<b>Would the project:</b>				
a) Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Conflict with any applicable habitat conservation plan or natural community conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The Program EIR did not require SCs for minimizing impacts to resources related to land use and planning where future projects would be implemented under the SUP. Likewise, there are no applicable or required SCs related to land use and planning resources associated with the proposed project.

**Responses:**

- a) **No Impact.** The Project site is located in a residential area of the Boyle Heights community on a site that is already developed as a school. The proposed Project would involve the demolition of buildings and the construction of their replacements. Improvements will be limited to the interior of the site and there would be no physical

effect on the surrounding residential neighborhood. As such, a community will not be divided and no further inquiry is necessary.

- b) **No Impact.** The City's General Plan use designation for the Project site is PF. Furthermore, the proposed Project site is located within the Boyle Heights CPA. The CPA Land Use Designation for the Project site is also PF. The City of Los Angeles Municipal Code – Zoning Plan has designated the proposed Project as PF: Public Facilities, or a zone for the use and development of publicly owned land, including public elementary and secondary schools. Moreover, the proposed Project site is currently Roosevelt HS and will remain as such after the proposed improvements. Therefore, the proposed Project would not conflict with an applicable land use plan, policy, or regulation of an agency with jurisdiction over the project site as it is zoned for public facility use and would be developed as a public facility use. No impact would occur from the proposed Project and no further analysis is required.
  
- c) **No Impact.** The Project site is not within a habitat conservation plan or a natural community conservation plan (See **Threshold IV.f) in Biological Resources**). Thus, the proposed Project would not conflict with any applicable conservation elements or natural community conservation plan. No impact would occur as a result of Project implementation, and there is no need for further analysis.



	Issues:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
XI.	<b>MINERAL RESOURCES. Would the project:</b>				
	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"/>

The Program EIR did not require SCs for minimizing impacts to mineral resources where future projects would be implemented under the SUP. Likewise, there are no applicable or required SCs related to mineral resources associated with the proposed project.

**Responses:**

**a,b) No Impact.** The Project site is located in an urbanized area in the City of Los Angeles. There are no identified mineral resources within the Project site and the Boyle Heights community plan area as designated by the City’s General Plan.<sup>72</sup> Therefore, no impact associated with mineral resources would occur, and no further analysis is required.

<sup>72</sup> City of Los Angeles General Plan. 2001. *Conservation Element, Exhibit A Mineral Resources*. Available at: <http://planning.lacity.org/cwd/gnlpln/ConsvElt.pdf>, accessed February 9, 2017.

Issues:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>XII. NOISE. Would the project result in:</b>				
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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input 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 checked="" type="checkbox"/>		<input 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 2 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"/>

	Issues:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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"/>

**Responses:**

- a) **Potentially Significant Impact.** Construction and operation of the proposed Project will have the potential to increase noise levels in the vicinity of the Project site. Construction activities could generate substantial noise affecting existing residences adjacent to the Project site. In addition, vehicle trips that would be generated by the proposed Project could result in increased noise. The EIR will address the potential noise impacts associated with construction and operation of the proposed Project.
  
- b) **Potentially Significant Impact.** Groundborne vibration or noise would primarily be generated during construction of the proposed Project. The temporary increase in the groundborne vibration levels could impact sensitive land use (e.g., single- and multi-family residential, as well as the Project site itself) within the Project area. This issue will be analyzed further in the EIR.
  
- c) **Less than Significant Impact.** The majority of any long-term noise impacts will come from traffic traveling to and from the area. Off-site noise generated by traffic from the Project was modeled under existing year (2017) no project and future year (2022) with project conditions utilizing the FHWA TNM 2.5 model. When calculating future noise levels along project area roadways from traffic, additional impacts from 24 additional potential new or proposed Projects were considered. Thus, the existing traffic results without the proposed Project and future traffic results with the proposed Project account for the cumulative impacts from these other projects. Since the noise impacts are generated directly from the traffic study results, the existing without project and future with project noise impacts described reflect cumulative impacts.

**Table 3**  
**Estimated Cumulative AM Peak Hour Mobile Source Noise Levels**

Roadway Segment	Estimated dB(A), Leq			Significant Impact
	No Project (2017)	With Project (2022)	Project Change	
4 <sup>th</sup> Street from Soto Street to Mathews Street	61.1	61.3	0.2	No
4 <sup>th</sup> Street from Mathews Street to Mott Street	62.8	63.3	0.5	No
6 <sup>th</sup> Street from Mathews Street to Mott Street	53.7	53.6	-0.1	No
Mathews Street from 4 <sup>th</sup> Street to 6 <sup>th</sup> Street	55.7	56.0	0.3	No
Mott Street from 4 <sup>th</sup> Street to 6 <sup>th</sup> Street	58.0	57.4	-0.6	No

*Source: Impact Sciences, 2017.*

**Table 3, Estimated Cumulative AM Peak Hour Mobile Source Noise Levels**, shows the future with project compared to existing without project traffic noise scenarios. The greatest Project-related noise increases would be 0.5 dB(A) Leq along 4<sup>th</sup> Street between Mathews Street and Mott Street during the AM peak hour. These impacts are considered negligible and would be less than the 3 dB(A) significance threshold. Therefore, the Project’s individual and cumulative mobile source noise impacts would be considered less than significant. No further analysis is required.

- d) Potentially Significant Impact.** Demolition and construction activities associated with the proposed Project will result in a temporary increase in noise levels in the areas adjacent to the Project site. This issue will be analyzed further in the EIR and mitigation measures will be included as necessary.
- e) No Impact.** The Project site is not located within an airport land use plan or within two miles of a public airport or public use airport. The nearest public (general aviation) airport is the San Gabriel Valley Airport in the City of El Monte, located approximately 10 miles northeast of the Project site. Los Angeles International Airport (LAX) is approximately 13 miles southwest of the Project site. As such, the Project would not expose future employees or students to excessive airport-related noise levels. No impacts would occur from the proposed Project.

- f) **No Impact.** The Project site is not in the vicinity of a private airstrip. As a result, the proposed Project will not expose future employees or students to excessive noise levels from any private airstrip. No impacts would occur from the proposed Project.

<b>Issues:</b>	<b>Potentially Significant Impact</b>	<b>Less Than Significant With Mitigation Incorporated</b>	<b>Less Than Significant Impact</b>	<b>No Impact</b>
<b>XIII. PEDESTRIAN SAFETY. Would the project:</b>				
a) Substantially increase vehicular and/or pedestrian safety hazards due to a design feature or incompatible uses?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Create unsafe routes to schools for students walking from local neighborhoods?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input 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"/>

**Responses:**

**a-b) Potentially Significant Impact.** The proposed Project would utilize the existing network of regional and local roadways that serve the Project area. No changes to the design or configuration of roadways surrounding the Project site and/or the streetscape are proposed. The Project would increase daily trips, including truck haul trips, associated with construction. Therefore, the Project would potentially increase vehicular and/or pedestrian safety hazards.

During the construction phase, truck traffic would access the site on a daily basis. The intersection of haul trucks and pedestrians has the potential to result in safety hazards. The Project would generate a number of haul truck trips per day over the course of construction. The potential for these trips to impact pedestrian safety will be further analyzed in the EIR.

**c) Less than Significant Impact.** As noted above, these guidelines are generally for the acquisition of new school sites. While the site is adjacent to 4<sup>th</sup> Street, a major arterial roadway, the Project site has been in use as a school since 1923. As per the current

existing conditions, the primary pedestrian access to the Project site would remain along 4<sup>th</sup> Street, and access to staff parking would remain on Mathews Street. Minor changes to improve safety would be made to the existing pedestrian circulation patterns. Enhancements to pedestrian crossings on 4<sup>th</sup> Street, near the school front entrance, would be made at the existing signalized intersections of Mathews Street/4<sup>th</sup> Street (at the northwest corner of the school site), Fickett Street/4<sup>th</sup> Street (at the north side of the school site), and Mott Street/4<sup>th</sup> Street (at the northeast corner of the school site). These intersections all have existing striped yellow school crosswalks.

There are no identified impacts for pedestrian access or general safety issues for the proposed school access configuration, based on the review of the conceptual site plan. Impacts would be less than significant and no additional analysis would be required.

<b>Issues:</b>	<b>Potentially Significant Impact</b>	<b>Less Than Significant With Mitigation Incorporated</b>	<b>Less Than Significant Impact</b>	<b>No Impact</b>
<b>XIV. POPULATION AND HOUSING.</b>				
<b>Would the project:</b>				
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 road 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"/>

The Program EIR included a SC for minimizing impacts to resources related to population and housing of the existing environment in areas where future projects would be implemented under the SUP. However, there are no applicable SCs related to population and housing associated with the proposed project.

**Responses:**

- a) **No Impact.** The proposed Project would not directly induce substantial growth to the area as it would accommodate the existing student population. The proposed new facilities on campus would be for Roosevelt HS current students, faculty, and staff. The proposed Project is a modernization plan and no increase in students or staff is proposed. In addition, the proposed Project does not include any features such as new homes or businesses that may induce growth. The proposed Project also would not indirectly induce growth through the extension of roads or other infrastructure as no



new infrastructure or roads are proposed. As such, there will be no impact and no further analysis is needed.

**b,c) No Impact.** The Project site is the campus for Roosevelt HS and is not in use for housing. Therefore, the proposed Project would not result in the displacement of existing housing or displace a substantial number of people resulting in the construction of replacement housing elsewhere. No impacts would occur from the proposed Project and no further analysis is required.

Issues:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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XV. **PUBLIC SERVICES. Would the project:**

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

i) Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii) Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii) Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
iv) Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
v) Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

The Program EIR included SCs for minimizing impacts to the public services of the existing environment in areas where future projects would be implemented under the SUP. Applicable SCs related to impacts to public services associated with the proposed Project are provided below.

**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.

**SC-PS-2** LAUSD shall implement emergency preparedness and response procedures in all schools as required in LAUSD References, Bulletins, Safety Notes, and Emergency Preparedness Plans.

**Responses:**

**a)(i,ii) Less than Significant Impact.** The Project site is currently served by the Los Angeles Fire Department Fire Station 25, located approximately 2,500 feet to the southeast. Similarly, Roosevelt HS is under the jurisdiction of the Los Angeles School Police Department (LASPD). The LASPD provides general law enforcement services for all LAUSD campuses, however the everyday campus activities would be under the supervision of the principal, vice principal, teachers, and other staff members. LAPD would provide additional police protection services to the project site if needed. The nearest LAPD station is the Hollenbeck Community Police Station, approximately 2,800 feet northwest of the site. As the Project is not expected to increase the population or size of the site, current government facilities would be sufficient to properly serve the campus. Therefore, the Project would have a less than significant impact on these public services and requires no further investigation.

**a.(iii) No Impact.** The proposed Project would not include any residential component and would not directly and/or indirectly result in population growth. Development of the proposed Project would improve Roosevelt HS for its current students and not warrant additional schools in the area. No impact would occur from the proposed Project and no further analysis is required.

**a.(iv) No Impact.** The City of Los Angeles Department of Recreation and Parks manages park facilities and provides recreation programs to Boyle Heights residents. Hollenbeck Park, Boyle Heights Sports Center, and Evergreen Recreational Center are all within a 2,000-foot radius of the Project site. The City also shares use of the swimming pool on the Roosevelt HS campus. The proposed Project would not include any residential uses that would result in a permanent population increase, resulting in a need for new or expanded park facilities. The proposed Project design includes active and passive areas located throughout the Project site, including play fields, a courtyard, and several other

landscaped areas. Pursuant to California Education Code Section 38131.b, also known as the Civic Center Act, school facilities would be available during off-school hours for permitted use by public organizations which would add to the available recreation space in the community. With the availability of shared-use open space for recreation onsite, the project is anticipated to have a beneficial effect on the community. Impacts would be beneficial and no further analysis is necessary.

- a.(v) Less than Significant Impact.** The closest library to the proposed Project site is the Benjamin Franklin Library is located at 2200 E. 1<sup>st</sup> Street, approximately 1,700 feet from Roosevelt HS. There are no residential units are included as part of the proposed Project which would result in a permanent increase in population resulting in a need for new or expanded library facilities. In addition, Roosevelt HS has a library facility on campus. Therefore, any increase in use of public libraries would be less than significant, requiring no further analysis.

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

The Program EIR did not require SCs for minimizing impacts to recreation resources where future projects would be implemented under the SUP. Likewise, there are no applicable or required SCs related to recreation resources associated with the proposed project.

**Responses:**

- a) **No Impact.** The proposed Project does not involve residential uses and as such, there will not be a permanent population increase. The proposed Project design includes active and passive areas located throughout the project site, including play fields, a courtyard, and several other landscaped areas. Pursuant to California Education Code Section 38131.b, also known as the Civic Center Act, school facilities would be available during off-school hours for permitted use by public organizations which would add to the available recreation space in the community. With the availability of shared-use recreation facilities onsite, the project is anticipated to result in beneficial effects for the community. Therefore, no further analysis is required.

- b) **Less than Significant Impact.** Refer to **Section XV, Public Services a(iv)**, above. The proposed Project includes the construction of a school facility. Although recreational uses are proposed as part of the proposed Project, the construction of these facilities is a small part of the Project (i.e., playfields, etc.) that, as demonstrated throughout this document, would not result in any specific adverse physical impacts. Therefore, impacts related to requiring construction or expansion of recreational facilities is less than significant, and no further analysis is required.

Issues:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>XVII. TRANSPORTATION and TRAFFIC.</b> <b>Would the project:</b>				
a) Cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system (i.e., result in a substantial increase in either the number of vehicle trips, the volume to capacity ratio on roads, or congestion at intersections)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Exceed, either individually or cumulatively, a level of service standard established by the county congestion management agency for designated roads or highways?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	<b>Issues:</b>	<b>Potentially Significant Impact</b>	<b>Less Than Significant With Mitigation Incorporated</b>	<b>Less Than Significant Impact</b>	<b>No Impact</b>
f)	Conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>



The Program EIR included SCs for minimizing impacts to transportation and traffic of the existing environment in areas where future projects would be implemented under the Program EIR. Applicable SCs related to transportation and traffic resource impacts associated with the proposed Project are provided below.

**SC-T-1            OEHS CEQA Specification Manual, Appendix C, Traffic and Pedestrian Safety Requirements for New Schools.**

Requirements identifies performance requirements for the selection and design of school sites to minimize potential pedestrian safety risks:

- Site Selection
- Bus and Passenger Loading Areas
- Vehicle Access
- Pedestrian Routes to School

Requirements also state school traffic studies shall identify measures to ensure separation between pedestrians and vehicles along potential pedestrian routes, such as sidewalks, crosswalks, bike paths, crossing guards, pedestrian and traffic signals, stop signs, warning signs, and other pedestrian access measures.

**SC-T-2            School Design Guide**

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

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

**SC-T-3            Coordinate with the local City or County jurisdiction and agree on the following:**

- Compliance with the jurisdiction’s design guidelines for access, parking, and circulation in the vicinity of the project.

- Scope of analysis and methodology for the traffic and pedestrian study, including trip generation rates, trip distribution, number and location of intersections to be studied, and traffic impact thresholds.
- Implementation of SR2S, traffic control and pedestrian safety devices.
- Fair share contribution and/or other mitigation measures for potential traffic impacts.
- Traffic and pedestrian safety impact studies shall address local traffic and congestion during morning arrival times, and before and after evening stadium events.
- Traffic study will use the latest version of Institute of Transportation Engineer's (ITE) Trip Generation manual to determine trip generation rates (parents vehicles, school buses, staff/faculty vehicles, and delivery vehicles) based on the size of the school facility, unless otherwise required by local jurisdiction.
- Loading zones will be analyzed to determine the adequacy as pick-up and drop-off points. Recommendations will be developed in consultation with the local jurisdiction for curb loading bays or curb parking restrictions to accommodate loading needs and will control double parking and across-the-street loading.

**SC-T-4** LAUSD shall require its 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.

**Responses:**

- a) **Potentially Significant Impact.** The proposed Project would utilize the existing network of regional and local roadways that serve the Project area. There are no changes proposed to the design or configuration of roadways surrounding the Project site. The Project's construction would generate haul truck trips over a period of 48 months (four

years) which will be further analyzed in the EIR. Furthermore, a traffic study will be prepared for the proposed project, and the methodology, findings, and conclusions of the analysis will also be provided in the EIR.

- b) Potentially Significant Impact.** By its nature, the Los Angeles County Congestion Management Program (CMP) is a cumulative scenario that considers the impact of single projects in the context of cumulative traffic demand on CMP roadways. CMP guidelines require that freeway monitoring locations must be examined if the proposed Project would add 150 or more trips (in either direction) during either the AM or PM weekday peak hours or 50 or more trips at CMP intersections during the AM or PM weekday peak hour. The proposed Project would potentially add 150 or more trips during construction (in either direction) during the AM or PM weekday peak hours at CMP mainline freeway monitoring locations or 50 or more trips during either the AM or PM peak weekday peak hours at CMP intersections, which is the threshold for preparing a CMP facility traffic impact assessment. Consequently, the proposed Project may potentially be significant with the criteria. This will be further analyzed in the EIR.
- c) No Impact.** The proposed Project would not impact air traffic. The Project site is not located within an airport safety zone nor does the Project propose any structure that would conflict with air traffic patterns. The nearest airports are the Los Angeles International Airport approximately 14 miles to the west, and the Santa Monica Airport approximately 13 miles to the west. No impact would occur and no further analysis is needed in the EIR.
- d) Less than Significant Impact.** The proposed Project would utilize the existing network of regional and local roadways that serve the Project area. There are no changes proposed to the design or configuration of roadways surrounding the Project site. The proposed Project would not create new hazards due to design features or incompatible uses. Impacts would be less than significant and no additional analysis would be required.
- e) Less than Significant Impact.** The Project is not anticipated to interfere with an emergency response plan or evacuation plan. Construction activities would not result in temporary partial obstruction of adjacent roadways and the District would comply with applicable regulations relating to access. Further, the proposed Project would be developed in consultation with the City of Los Angeles Fire Department, LAPD, and

City of Los Angeles Department of Public Works, Bureau of Engineering. Therefore, the impact would be less than significant and no further study is required.

- f) **Less than Significant Impact.** County of Los Angeles Metropolitan Transit Authority (Metro) bus lines run along Soto Street and 4<sup>th</sup> Street. Construction and operation of the proposed Project would not alter the location of existing bus stops. LAUSD works with Metro to implement the Metro Transit Education Program which provides transit education to the public and schools along the Metro Rail Lines (the Soto Street Gold Line station is located three blocks north of the campus). It offers students the opportunity to ride the train and receive specific safety information, site specific presentations in the schools and a mobile theatre. The goal of the Transit Education Program is to increase public awareness and teach residents of the Los Angeles County how to live safely around trains and buses.<sup>73</sup> Implementation of the proposed Project would not conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks). Impacts related to alternative transportation would be less than significant, and no further analysis is necessary.

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<sup>73</sup> LAUSD OEHS Traffic and Pedestrian Safety Program, <https://achieve.lausd.net/Page/4238>

Issues:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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**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"/> |
|----|--|--------------------------|--------------------------|--------------------------|-------------------------------------|

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

The Program EIR included SCs for minimizing impacts to tribal cultural resources of the existing environment in areas where future projects would be implemented under the SUP. Applicable SCs related to aesthetic resource impacts associated with the proposed Project are provided below.

**SC-CUL-18** 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.

**Responses:**

**a,b) 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 the local register of historical resources.<sup>74</sup>

As part of the AB 52 process, Native American tribes must submit a written request to LAUSD (lead agency) to be notified of projects within their traditionally and culturally affiliated area. LAUSD must provide written, formal notification to those tribes within 14 days of deciding to undertake a project. The tribe must respond to LAUSD within 30 days of receiving this notification if they want to engage in consultation on the Project, and LAUSD must begin the consultation process within 30 days of receiving the tribe's request. Consultation concludes when either: 1) the parties agree to mitigation measures to avoid a significant effect on a tribal cultural resource; or 2) a party, acting in good faith and after reasonable effort, concludes mutual agreement cannot be reached. To date the District has not received any requests to be notified about projects in the District. Additionally, although the school is eligible for listing on the National Register of Historic Places and the California State Register of Historical Resources, no specific Tribal resources have been identified and the Project site is unlikely to yield sensitive resources during ground disturbance as discussed in **Threshold V.b**). However, in the unlikely event that construction-related ground disturbance results in the discovery of potential resources, **SC-CUL-18** would be implemented in order to avoid potential impacts to Tribal resources. No impacts to listed tribal cultural resources would occur.

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<sup>74</sup> California Natural Resources Agency. AB 52 Regulatory Update. <http://resources.ca.gov/ceqa/>.

Issues:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>XIX. UTILITIES AND SERVICE SYSTEMS. Would the project:</b>				
a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 storm water 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"/>



	Issues:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
d)	Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed? In making this determination, the District shall consider whether the project is subject to the water supply assessment requirements of Water Code Section 10910, et. seq. (SB 610), and the requirements of Government Code Section 664737 (SB 221).	<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 type="checkbox"/>	<input checked="" 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 type="checkbox"/>

The Program EIR included SCs for minimizing impacts to utilities and service systems of the existing environment in areas where future projects would be implemented under the SUP. Applicable SCs related to aesthetic resource impacts associated with the proposed Project are provided below.

**SC-HWQ-1 Stormwater Technical Manual**

The manual establishes design requirements and provides guidance for the cost-effective improvement of water quality in new and significantly redevelopment LAUSD school sites. These guidelines are intended to improve water quality and mitigate potential impacts to the Maximum Extent Practicable (MEP). While these guidelines meet current post-construction Standard Urban Stormwater Mitigation Plan (SUSMP) requirements. The guidelines address the mandated post-construction element of the NPDES program requirements.

**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.

**SC-USS-1: School Design Guide. January 2014**

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 percent by weight as defined in Specification 01340, Construction & Demolition Waste Management.

**Guide Specifications 2004 - Section 01340, Construction & Demolition Waste Management**

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

**SC-USS-2:** LAUSD shall coordinate with the City of Los Angeles Department of Water and Power (“LADWP”), or other appropriate jurisdiction and department, prior to the relocation or upgrade of any water facilities, to reduce the potential for disruptions in service.

**SC-USS-3:** Provide easily accessible area serving the entire school that are dedicated to the collection and storage of materials for recycling including (at a minimum) paper, cardboard, glass, plastics, metals and landscaping waste. There shall be at least one centralized collection point (loading dock), and ability for separation of recyclables where waste is disposed of for classrooms and common areas such as cafeteria’s, gyms or multi-purpose rooms.

**Responses:**

a) **Less than Significant Impact.** The RWQCB regulates the treatment of wastewater at treatment plants and the discharge of the treated wastewater into receiving waters.

As required by **SC-HWQ-1** and **SC-HWQ-2** detailed above, LAUSD would need to obtain NPDES permits when carrying out construction with requirements for wastewater discharge, BMPs, and SWPPP. Additionally, LAUSD would need to comply with the effluent quality criteria specified within the NPDES so the proposed Project would not exceed wastewater treatment requirements of the applicable RWQCB.

The Project site is currently served by an 8” sewer line along Mathews Street, a 6” sewer line along Mott Street, an 8” sewer line along E. Fourth Street, and an 8” sewer line along

E. Sixth Street. There are multiple existing sewer laterals around the site, especially along Mathews Street.

Implementation of the proposed Project would not result in an increase in the on-site school population (i.e., students, faculty, and staff). As such, the proposed Project would not increase generated wastewater, which would continue to be contained and directed through the current system to a wastewater treatment plant in the City. Therefore, this impact would be less than significant, and no further analysis is necessary.

- b) **Less than Significant Impact.** Refer to **Threshold (a)** above, for a discussion of wastewater impacts. Wastewater impacts would be less than significant.
- c) **Less than Significant Impact.** A significant impact would occur if the volume of stormwater water runoff would increase to a level exceeding the capacity of the storm drain system serving a project site, requiring the construction of new stormwater drainage facilities.

Currently, stormwater from the site curb drains out onto the streets. The water then flows onto existing catch basins located at the southeast and southwest corners of the site's public right of way. As described in **IX e)**, the proposed Project would not result in a significant increase in site runoff, or significant changes in the local drainage patterns. Therefore, this impact would be less than significant, and no further analysis is necessary.

- d) **Less than Significant Impact.** Senate Bill 221 and Senate Bill 610 amended existing California law regarding land use planning and water supply availability by requiring more information and assurance of supply than is currently required in an Urban Water Management Plan (UWMP). As of January 1, 2002, California law requires water retail providers to demonstrate that sufficient and reliable supplies are available to serve large-scale developments (i.e., 500 dwelling units or 250,000 square feet of commercial space) prior to completion of the environmental review process and approval of such large-scale projects.

Under SB 610, it is the responsibility of the water service provider to prepare a Water Supply Assessment (WSA) requested by a City or County for any "project" defined by Section 10912 of the Water Code that is subject to CEQA.

Section 10912 of the Water Code defines a “project” as

- a proposed residential development of more than 500 dwelling units;
- a proposed shopping center or business establishment employing more than 1,000 persons or having more than 500,000 sf of floor space;
- a proposed commercial office building employing more than 1,000 persons or having more than 250,000 sf of floor space;
- a proposed hotel or motel, or both, having more than 500 rooms;
- a proposed industrial, manufacturing or processing plant, or industrial park, planned to house more than 1,000 persons, occupying more than 40 acres of land, or having more than 650,000 sf of floor space;
- a proposed mixed-use project that includes one or more of the previously listed projects; or
- a proposed Project that would demand an amount of water equivalent to, or greater than, the amount of water required by a 500-dwelling-unit project.<sup>75</sup>

The proposed Project would not meet any of the criteria resulting in the need for a WSA; therefore, a WSA is not necessary.

During construction water may be used on site for dust suppression or similar activities. The small amount of water necessary during construction of the proposed Project would not result in the need for new or expanded water entitlements. Construction of the proposed Project would not result in a significant impact to the City’s existing water supply.

Implementation of the proposed Project would not result in an increase in the on-site school population (i.e., students, faculty, and staff). As such, buildout of the proposed Project would generate a demand on the City’s water supplies similar to that of the current demand. Water supply to the Project site is provided by the LADWP. As the

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<sup>75</sup> Water demand is calculated using City of Los Angeles Department of Public Works Wastewater Engineering Services Division generation factors in units of gallons per day (GPD). Educational facilities have an average demand rate of 15 GPD/student and dwelling units (DU) average 228 GPD/du. Thus, Hale Charter Academy would generate approximately 7,980 GPD at full enrollment. Project implementation would not exceed expected water demands of a 500-dwelling-unit project.

proposed Project would not increase the total number of students enrolled, the proposed Project would not increase demand on the City's water supplies.

Further, implementation of Program EIR SCs for water supply would also offset potential impacts associated with the proposed Project. With implementation of SC-USS-2, impacts would be less than significant, and no further analysis is necessary.

- e) **Less than Significant Impact.** Refer to **Threshold a)** and **b)** above.
- f) **Less than Significant Impact.** Construction of the proposed Project would generate construction debris. Waste materials generated during construction are expected to be typical construction debris, including concrete, stucco, asphalt, rocks, building materials, wood, paper, glass, plastic, metals, cardboard, and other inert wastes (i.e., wastes that are not likely to produce leachates of environmental concern), as well as green wastes. The District would be subject to the 2016 CAL Green Construction Waste Reduction Requirements that require 65 percent of the construction waste generated on the project site be diverted from landfills.<sup>76</sup> Waste generated during demolition and construction that is not recycled would result in an incremental and intermittent increase in solid waste disposal at landfills; however, this increase in solid waste would be short-term and not exceed the available capacities of area landfills.

In addition, the proposed Project would be subject to the **SC-USS-1**, which requires compliance with the School Design Guide & Specification 01340, Construction and Demolition Waste Management, seen above.

In addition, the Project would comply with all waste recycling/reuse requirements in California Green Building Code Section 5.408, and the LAUSD School Design Guide & Specification 01340, Construction & Demolition Waste Management, that requires the collection and separation of all construction and demolition waste materials on-site, reuse or recycling on site, transportation to approved recyclers, transportation to legally designated landfills, for the purpose of recycling, salvaging, and/or reusing 75 percent of the construction and demolition waste generated. Thus, construction impacts related to solid waste would be less than significant.

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76 CalRecycle. *Frequently Asked Questions Website*. Available at: <http://www.calrecycle.ca.gov/LGCentral/Library/canddmodel/instruction/faq.htm#CALGreen>, accessed February 9, 2017.

Operationally, the District contracts with private waste haulers to dispose of solid waste generated on school campuses. As the size of the student body would not increase, the proposed Project would not expand total solid waste generation within the District, and sufficient capacity exists to serve existing students. The proposed Project would comply with the recycling requirements in AB 341, and would adhere to **SC-USS-3** for accessible collections of recycling material, seen above.

Thus, the proposed Project would have a less than significant impact on landfill capacity. No further analysis is required.

- g) Less than Significant Impact.** During construction and operation of the proposed Project, the District would comply with all applicable City, County, and state solid waste diversion, reduction, and recycling mandates. Additionally, the proposed Project would be subject to **SC-USS-3**.

Compliance with **SC-USS-3** would ensure project compliance with statutes and regulations governing solid waste, and the impact would be less than significant. No further analysis is required.

Issues:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>XX. MANDATORY FINDINGS OF SIGNIFICANCE</b>				
a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of 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, substantially 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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Does the project have impacts which are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that incremental effects of an individual project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>



	Issues:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
c)	Does the project have environmental effects which cause substantial adverse effects on human beings, either directly or indirectly?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**Responses:**

**a) Potentially Significant Impact.**

As discussed in **Section IV, Biological Resources**, the proposed Project would not impact any endangered fauna or flora. Further, because of the highly urbanized nature of the Project site and the surrounding area, construction and operation of the proposed Project would not impact the habitat or population of the Project site and the surrounding area, the Project would not impact the habitat or population level of fish or wildlife species, nor would it threaten a plant or animal community, nor impact the range of a rare endangered plant or animal.

Potentially significant impacts related to cultural resources will be analyzed further in the EIR.

**b) Less than Significant Impact.** Based on the preceding discussion, with implementation of Standard Conditions, and compliance with existing regulations, the proposed Project would not result in any significant adverse impacts which could contribute to a cumulatively considerable impact.

**c) Less than Significant Impact.** As discussed in the above analyses for the Project, with implementation of the SCs, and compliance with existing regulations, the proposed Project would not result in any unmitigated significant adverse impacts. Thus, the Project would not have the potential to result in substantial adverse effect on human beings.

**XXI. ENERGY CONSUMPTION**

The following section evaluates potential impacts associated with the consumption of energy that would result from the implementation of the proposed Project. The section generally follows the guidance for the evaluation of energy impacts provided in Appendix F, Energy Conservation, of the *State CEQA Guidelines*.

It is noteworthy that the directives in Appendix F are advisory. In addition, Appendix F states the following: “Potentially significant energy implications of a project shall be considered in an EIR to the extent relevant and applicable to the project. The following list of energy impact possibilities and potential conservation measures is designed to assist in the preparation of an EIR. In many instances, specific items may not apply or additional items may be needed. Where items listed below are applicable or relevant to the project, they should be considered in the EIR.” Therefore, the evaluation below does not address every directive in Appendix F. As directed by CEQA, the focus of the analysis is whether the Project would result in a wasteful or inefficient consumption of energy, and whether mitigation is required to avoid or reduce inefficient or wasteful consumption of energy.

Issues:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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- XXI. Energy. Would the project:**
- a) **The Project would not involve the wasteful, inefficient, and unnecessary consumption of energy, especially fossil fuels such as coal, natural gas, and petroleum, associated with project design, project location, the use of electricity and/or natural gas, and/or the use of fuel by vehicles anticipated to travel to and from the project.**

	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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**Response:**

**a) Less than Significant Impact.**

**Electricity Supply**

LADWP provides electricity service to the Project site. LADWP is the nation's largest municipal electric utility, and serves a 465-square-mile area in Los Angeles and much of the Owens Valley. The Power System supplies more than a 26 million megawatt-hours (MWh) of electricity a year for the City's 1.4 million residential and business customers.<sup>77</sup> Electrical service provided by LADWP is divided into two planning districts: Valley and Metropolitan. The Valley Planning District includes the LADWP service area north of Mulholland Drive, and the Metropolitan Planning District includes the LADWP service area south of Mulholland Drive. The Project site is located within the LADWP Metropolitan Planning District.

In total, LADWP operates 21 receiving stations and 162 distribution stations to provide electricity to LADWP customers, with additional facilities to be acquired as their load increases. Power supply sources include: 20 percent from renewable energy sources, 22 percent from natural gas, 9 percent from nuclear, 2 percent from large hydro, 40 percent from coal, and 7 percent from other and unspecified sources. Typical residential energy use per customer is about 500 kilowatt-hours (kWh) per month. Business and industry consume about 70 percent of the electricity in Los Angeles, but residents constitute the largest number of customers.<sup>78</sup> Projected future demand growth for LADWP is less than 1 percent per year.

LADWP has a maximum plant capacity of 7200 megawatts. Historically, Los Angeles peak demand was 6.396 reached on September 16, 2014.

Power lines are located along the streets surrounding the Project site, including East 4<sup>th</sup> Street, South Mathews Street, East 6<sup>th</sup> Street, and South Mott Street. The proposed Project would receive power by connecting the new buildings to the existing easements and power lines surrounding the site.

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<sup>77</sup> LADWP, 2016 IRP, Executive Summary pg. ES-1, [https://www.ladwp.com/cs/idcplg?IdcService=GET\\_FILE&dDocName=OPLADWPCCB562207&RevisionSelectionMethod=LatestReleased](https://www.ladwp.com/cs/idcplg?IdcService=GET_FILE&dDocName=OPLADWPCCB562207&RevisionSelectionMethod=LatestReleased), accessed June 21, 2017

<sup>78</sup> Ibid.

## Natural Gas

Natural gas is provided and distributed to residents and businesses in the City of Los Angeles by the Southern California Gas Company (SoCalGas). According to the 2016 California Gas Report, SoCalGas is expected to provide an average of 2,526,000 Kilo British Thermal Unit (kBtu) per day by 2021.<sup>79</sup> In addition, due to modest economic growth, energy efficiency standards and programs, renewable electricity goals and the decline in commercial and industrial demand, starting in 2013 and continuing through 2035, natural gas demands are projected to decline at an annual rate of 0.6 percent throughout the SoCalGas service area.<sup>80</sup>

SoCalGas purchases gas supplies on a daily, monthly, and longer-term basis from producers and marketers in California, Canada, the Rockies, and elsewhere in the U.S. Southwest. In 2012<sup>81</sup>, natural gas was used in California to produce electricity (45.6 percent), in residential uses (20.8 percent), in industrial uses (14.5 percent), oil and gas industry operations (9.4 percent), in commercial uses and for transportation (8.6 percent), for agriculture (0.5 percent), and other unspecified uses (0.6 percent). The total natural gas usage in 2012 was 23,323 million therms.<sup>82</sup>

## Petroleum Based Fuel

In 2016, it is estimated that 15.2 billion gallons of gasoline (non-diesel)<sup>83</sup> and 2.9 billion gallons of diesel fuel<sup>84</sup> were sold statewide. The estimated 2015 gasoline sales for Los Angeles County<sup>85</sup> were approximately 3.47 billion gallons, and 313 million gallons of diesel fuel.<sup>86</sup>

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<sup>79</sup> 2016 California Gas Report, prepared by the California Gas and Electric Utilities, Table 1-SCG, website, <https://www.socalgas.com/regulatory/documents/cgr/2016-cgr.pdf>, accessed June 21, 2017.

<sup>80</sup> Ibid. 2016 California Gas Report, prepared by the California Gas and Electric Utilities, pg. 64.

<sup>81</sup> Note: 2012 figures are the most recent available.

<sup>82</sup> California Energy Commission, Energy Almanac, Overview of Natural Gas in California, Natural Gas Supply. <http://energyalmanac.ca.gov/naturalgas/overview.html>, accessed June 21, 2017.

<sup>83</sup> California Energy Commission, California Gasoline Data, Facts, and Statistics. [http://www.boe.ca.gov/sptaxprog/reports/MVF\\_10\\_Year\\_Report.pdf](http://www.boe.ca.gov/sptaxprog/reports/MVF_10_Year_Report.pdf), accessed June 21, 2017.

<sup>84</sup> California Energy Commission, Diesel Fuel Data, Facts, and Statistics, [http://www.boe.ca.gov/sptaxprog/reports/Diesel\\_10\\_Year\\_Report.pdf](http://www.boe.ca.gov/sptaxprog/reports/Diesel_10_Year_Report.pdf), accessed June 21, 2017.

<sup>85</sup> Note: 2015 figures are the most recent available.

<sup>86</sup> California Energy Commission, California Annual Retail Fuel Outlet Report Results (CEC-A15) Spreadsheets, [http://www.energy.ca.gov/almanac/transportation\\_data/gasoline/2015\\_A15\\_Results.xlsx](http://www.energy.ca.gov/almanac/transportation_data/gasoline/2015_A15_Results.xlsx), accessed June 21, 2017.

## *Construction*

Project construction would require demolition, grading, utility installation, foundation construction, building construction, paving, and landscaping installation. All construction would be typical for the region and building type. During construction, energy would be consumed in the form of petroleum-based fuels (i.e., gasoline and diesel) used to power off-road construction vehicles and equipment on the Project site, for construction worker travel to and from the Project site, as well as for delivery truck trips; and to operate generators to provide temporary power for lighting and electronic equipment. The manufacturing of construction materials used by the proposed Project would also involve energy use.

Due to the large number of materials and manufacturers involved in the production of construction materials (including manufacturers in other states and countries), upstream energy use cannot be reasonably estimated. However, it is reasonable to assume that manufacturers of building materials such as concrete, steel, etc., would employ all reasonable energy conservation practices in the interest of minimizing the cost of doing business. Furthermore, neither the City nor the District has control over or the ability to influence energy resource use by the manufacturers of construction materials. Therefore, this analysis does not evaluate upstream energy use.

The average annual and total consumption of gasoline and diesel fuel during Project construction was estimated using the same assumptions and factors from CalEEMod that were used in estimating construction air emissions in **Section III., Air Quality**. As shown in **Table 4, Off-Road Construction Equipment Diesel Fuel Consumption**, and **Table 5, Construction Worker Gasoline Consumption**, a total of approximately 2,547,746 gallons of diesel fuel, and 19,541,600 gallons of gasoline would be consumed over the Project's construction horizon, or approximately 1,273,873 gallons of diesel fuel, and 9,770,800 gallons of gasoline annually.

**Table 4  
Off-Road Construction Equipment Diesel Fuel Consumption**

<b>Phase</b>	<b>Equipment Type</b>	<b>Units</b>	<b>Hours</b>	<b>Horse Power</b>	<b>Load Factor</b>	<b>Number of Days</b>	<b>Fuel Usage Factor<sup>a</sup></b>	<b>Diesel Usage<sup>b</sup></b>
Demolition	Concrete/Industrial Saws	1	8	81	0.73	88	0.05	2,082
	Excavators	1	8	158	0.38	88	0.05	2,114
	Rubber Tired Loaders	1	8	203	0.36	88	0.05	2,573
	Skid Steer Loaders	1	8	65	0.37	88	0.05	847
	Rubber Tired Dozers	2	8	247	0.4	88	0.05	6,956
	Crushing/Proc. Equipment	1	8	85	0.78	88	0.05	2,334
	Air Compressor	1	8	78	0.48	88	0.05	1,318
Site Preparation	Plate Compactors	1	8	8	0.43	88	0.05	121
	Rubber Tired Loaders	1	8	203	0.36	88	0.05	2,573
	Tractors/Loaders/ Backhoes	4	8	97	0.37	88	0.05	5,054
	Rubber Tired Dozers	3	8	247	0.4	88	0.05	10,434
	Skid Steer Loaders	1	8	65	0.37	88	0.05	847
	Rollers	1	8	80	0.38	88	0.05	1,070
	Trenchers	1	8	78	0.5	88	0.05	1,373
	Excavators	1	8	158	0.38	88	0.05	2,113
Paving	Pavers	1	8	130	0.43	86	0.05	1,923
	Paving Equipment	2	8	132	0.36	86	0.05	3,269
	Rollers	1	8	80	0.38	86	0.05	1,046
	Skid Steer Loaders	1	8	65	0.37	86	0.05	827
Building Construction	Cranes	1	8	231	0.29	434	0.05	11,629
	Forklifts	1	8	89	0.20	434	0.05	3,090
	Generator Sets	1	8	84	0.74	434	0.05	10,791
	Tractors/Loaders/ Backhoes	1	8	97	0.37	434	0.05	6,231
	Bore/Drill Rigs	1	8	221	0.5	434	0.05	19,183
	Pumps	1	8	84	0.74	434	0.05	10,791
	Air Compressor	1	8	78	0.48	434	0.05	6,500
Architectural Coatings	Air Compressors	1	6	78	0.48	87	0.05	977
<b>Project Total</b>								<b>118,066</b>

Source: CalEEMod Model Data; Impact Sciences, 2017

Notes:

a horsepower/gallon/hour

b in gallons

**Table 5**  
**Construction Worker Petroleum Fuel Consumption**

Phase	Number of Daily Trips	Number of Days	Average Round-Trip Commute Distance (in miles)	Fuel Usage (ave mpg) <sup>a</sup>	Fuel Usage (in gallons)
<b>Worker Trips (Gasoline)</b>					
Demolition	13	88	14.7	18.6	312,792
Site Preparation	15	88	14.7	18.6	360,914
Building Construction	150	434	14.7	18.6	17,799,642
Architectural Coatings	37	87	14.7	18.6	880,139
Paving	8	86	14.7	18.6	188,113
<b>Total Gasoline Usage</b>					<b>19,541,600</b>
<b>Hauling Trips (Diesel)</b>					
Construction	4,840 <sup>b</sup>	--	20	25.1	2,429,680
<b>Total Diesel Usage</b>					<b>2,429,680</b>

Source: CalEEMod Model Data; Impact Sciences 2017

Notes:

ave – average mpg – miles per gallon

a This is a conservatively estimated total, as it assumes no electric, hybrid or other alternate fuel use vehicles in the fleet mix.

b Number of haul trips total for entire phase

The estimated amounts of energy resources reported in **Tables 4** and **5** would be consumed over a period of four years (48 months) and would represent a small percentage of the total energy used in the state. More importantly, for reasons presented below, this consumption would not represent a wasteful and inefficient use of energy resources.

There is growing recognition among developers and retailers that sustainable construction is not any more expensive than “business as usual” construction methods, and further, that there are long-term significant cost-savings potential in utilizing green building practices and materials. In addition, the proposed Project would feature a sustainable design to comply with CALGreen and CHPS, which would result in the use of sustainable materials and recycled content that would reduce energy consumption during Project construction. Construction materials would include recycled materials and products originating from nearby sources to the extent feasible in order to comply with CALGreen and to reduce costs of transportation.

Worker trips are estimated in **Table 5** above. Worker trips are expected to vary by phase; however, trips would be temporary and would occur over the three-year timeframe of construction activity. As these trips would be temporary, they would not be wasteful or

inefficient use of energy. CARB has adopted Title 13 Section 2485, an Airborne Toxic Control Measure (ATCM), to limit diesel motor vehicle idling in order to reduce public exposure to diesel particulate matter and other toxic air contaminants. All diesel-fueled commercial heavy and medium-duty vehicles are required to comply with these measures.

The ATCM requires that construction idling times shall be minimized either by shutting equipment off when not in use, or limiting the maximum idling time to five minutes. It also requires that all construction equipment shall be maintained and properly tuned in accordance with manufacturer's specifications, and that all equipment shall be checked by a certified mechanic and determined to be running in proper condition prior to operation. **SC-AQ-2**, and **SC-AQ-3** require that construction equipment be selected to minimize emissions, and that all diesel-powered off-road equipment larger than 50 horsepower and operating on the site for more than two days continuously shall, at a minimum, meet US EPA particulate matter emissions standards for Tier 4 engines or equivalent.

Idling restrictions and the use of newer engines and properly maintained equipment would result in less fuel combustion and energy consumption. Furthermore, contractors and owners have a strong financial incentive to avoid wasteful, inefficient, and unnecessary consumption of energy during construction.

For the reasons listed above, the proposed Project would not involve the inefficient, wasteful, and unnecessary use of energy during construction and the construction-phase impact related to energy consumption would be less than significant.

### *Operation*

#### **Electricity and Natural Gas**

Title 24 represents the state policy on building energy efficiency. The goals of the Title 24 standards are to improve energy efficiency of residential and non-residential buildings, minimize impacts during peak energy-usage periods, and reduce impacts on state energy needs. The proposed Project is required to comply with Title 24, and therefore would be energy efficient. Furthermore, the proposed Project would include features to minimize energy consumption, many of which are mandated by the CALGreen and CHPS, which would further reduce the amount of electricity and natural gas consumed by the proposed Project.



It is anticipated that SCE and SoCalGas would be able to provide electricity and natural gas to the Project site using existing infrastructure. Only minor modifications to the distribution system would be required to connect the new buildings to be constructed under the proposed Project to the existing off-site electrical and natural gas systems. Further, the Project's demand for electricity by itself would not require the construction of new power generation facilities.

The proposed Project does not include a residential component, and would not induce population growth. The students who would attend the renovated school are existing students that currently attend other schools. As such, no new students would be generated through this Project. Many of the proposed students are currently housed in less efficient portable classrooms; therefore, the construction of the new energy efficient school would be an environmental benefit.

Further, the electrical loads and natural gas demand that would be required by the proposed Project are within the parameters of projected load growth in the City, and SCE and SoCalGas would be able to meet the demand in this area. Therefore, the proposed Project would not result in the consumption of energy resources that could not be accommodated within the long-term electricity and natural gas supply.

### **Petroleum-Based Fuel**

The proposed Project would result in the consumption of petroleum-fuel related to vehicular travel (quantified as VMT) to and from the Project site. **Table 6, Estimated Petroleum-based Fuel Usage at Buildout**, below, presents the projected consumption of approximately 64,612 gallons of diesel and 438,060 gallons of gasoline per year, or a total of 502,672 gallons of petroleum-based fuels per year based on an annual estimate of 9,769,680 VMT obtained from the CalEEMod results for the proposed Project.

This is a conservative estimate, given that it assumes no electric, hybrid, or other alternate fuel use vehicles in the fleet mix. Furthermore, this level of annual consumption is based on fuel efficiency rates (miles per gallon) shown in **Table 6**. Federal and State laws and regulations will continue to require further improvements in fuel efficiency in motor vehicles produced and/or sold in the US, and total annual consumption of petroleum-based fuel is expected to decrease over time.

**Table 6**  
**Estimated Petroleum-based Fuel Usage at Project Buildout**

Source	Fleet Mix <sup>a</sup>	Generation Factor <sup>b, c</sup>	Annual Consumption (in gallons)
Mobile			
Diesel (gallons)	16.6%	1,621,767/25.1 mpg	64,612
Gasoline (gallons)	83.4%	8,147,913/18.6 mpg	438,060
		<b>Total</b>	<b>502,672</b>

Source: *Impact Sciences 2017*

Notes:

mpg = miles per gallon

*a* Data Source: FHWA OHPI, *Highway Statistics, Fuel Consumption by State and Type*

<http://www.fhwa.dot.gov/policyinformation/pubs/hf/pl11028/chapter5.cfm>

*b* Data Source: California Department of Transportation, *2007 California Motor Vehicle Stock, Travel and Fuel Forecast*,

<http://www.energy.ca.gov/2008publications/CALTRANS-1000-2008-036/CALTRANS-1000-2008-036.PDF>

*c* Diesel-powered vehicles typically get 30-35% more miles per gallon than comparable vehicles powered by gasoline. US Department of Energy, *Fuel Economy Guide*, <http://www.fueleconomy.gov/feg/pdfs/guides/FEG2013.pdf>

As previously discussed, in 2016, it is estimated that 15.2 billion gallons of gasoline (non-diesel)<sup>87</sup> and 2.9 billion gallons of diesel fuel<sup>88</sup> were sold statewide. Thus, at buildout, the proposed Project would represent less than 0.002 percent of the statewide annual gasoline consumption and less than 0.001 percent of the statewide annual diesel consumption.

For the reasons listed above, the proposed Project would not involve the inefficient, wasteful, and unnecessary use of energy during operation and the operation-phase energy impact would be less than significant. No further analysis is necessary.

<sup>87</sup> California Energy Commission, *California Gasoline Data, Facts, and Statistics*. [http://www.boe.ca.gov/sptaxprog/reports/MVF\\_10\\_Year\\_Report.pdf](http://www.boe.ca.gov/sptaxprog/reports/MVF_10_Year_Report.pdf), accessed June 21, 2017.

<sup>88</sup> California Energy Commission, *Diesel Fuel Data, Facts, and Statistics*, [http://www.boe.ca.gov/sptaxprog/reports/Diesel\\_10\\_Year\\_Report.pdf](http://www.boe.ca.gov/sptaxprog/reports/Diesel_10_Year_Report.pdf), accessed June 21, 2017.

## **UNAVOIDABLE ADVERSE EFFECTS**

Appendix F of the State CEQA Guidelines recommends that the EIR report any unavoidable adverse impacts associated with the Project's energy use. The analysis presented above shows that the proposed Project would not result in a significant unavoidable impact associated with the use of energy.

## **IRREVERSIBLE COMMITMENT OF RESOURCES**

Appendix F states that an irreversible commitment of resources could occur if the project preempts future energy development or future energy conservation. The proposed Project would not preempt future energy development on the Project site since there are no energy resources located on or near the Project site. The proposed Project would also not preempt future energy conservation because the District would implement energy efficiency improvements through CHPs that become available in the future.

## **SHORT-TERM GAINS AND LONG-TERM IMPACTS**

Appendix F suggests that the project's short-term gains and long-term impacts can be evaluated by calculating the project's energy cost over the project's lifetime. As noted above, the proposed Project would not result in a wasteful use of energy. There would not be a reduction of long-term benefits for short-term gains as a result of the proposed Project.

## **GROWTH INDUCING EFFECTS**

Appendix F states that growth inducing effects may include the energy consumption of the growth induced by the Project. As there is no residential component of the Project, implementation of the proposed Project would not induce any population or employment growth beyond what has been anticipated by the region. Therefore, there would be no energy consumption related to growth induced by the proposed Project.

## ACRONYMS and ABBREVIATIONS

Air Resources Board	ARB
Air Quality Management Plan	AQMP
Ambient Air Quality Standards	AAQS
Backlight-Uplight-Glare	BUG
Below Ground Surfaces	bgs
Best Management Practices	BMPs
California Building Code	CBC
California Department of Education	CDE
California Department of Transportation	Caltrans
California Environmental Quality Act	CEQA
California Integrated Waste Management Act	CIWMA
California Water Code	CWC
Carbon Dioxide	CO <sub>2</sub>
Climate Action Team	CAT
Coarse Inhalable Particulate Matter	PM <sub>10</sub>
Congestion Management Program	CMP
Construction General Permit	CGP
County of Los Angeles Metropolitan Transit Authority	Metro
CO <sub>2</sub> equivalents	CO <sub>2</sub> e
Division of the State Architect	DSA
Environmental Protection Agency	EPA
Federal Emergency Management Agency	FEMA
Fine Inhalable Particulate Matter	PM <sub>2.5</sub>
Greenhouse Gases	GHG
Hydrofluorocarbons	HFCs
Illuminating Engineering Society	IES
Interstate 710	I-710
International Dark –Sky Association	IDA
Localized Significance Thresholds	LSTs
Los Angeles County Sanitation District	LACSD
Los Angeles Department of Water and Power	LADWP
Los Angeles Unified School District	LAUSD
Los Angeles Unified School District Program EIR	Program EIR
Maximum Extent Practicable	MEP
Methane	CH <sub>4</sub>
Mineral Resources Zone 1	MRZ-1
Model Lighting Ordinance	MLO
Most Likely Descendant	MLD
Multi-Purpose Room	MPR
National Pollution Discharge Elimination System	NPDES
Native American Heritage Commission	NAHC
Nitrogen Oxides	NO <sub>x</sub>

Nitrous Oxide	N <sub>2</sub> O
Office of Administrative Law	OAL
Office of Planning and Research	OPR
Ozone	O <sub>3</sub>
Perfluorocarbons	PFCs
Regional Transportation Plan /Sustainable Communities Strategy	RTP/SCS
Sacred Lands File	SLF
Science Technology Engineering Arts and Math	STEAM
Special Flood Hazard Areas	SFHA
South Central Coastal Information Center	SCCIC
South Coast Air Basin	SoCAB
South Coast Air Quality Management District	SCAQMD
Southern California Association of Governments	SCAG
Source Reduction and Recycling Element	SRRE
Standard Condition	SC
Standard Urban Stormwater Mitigation Plan	SUSMP
State Route 110	SR-110
State Water Resources Board	SWRB
Stormwater Pollution Prevention Plan	SWPPP
Sulfur Hexafluoride	SF <sub>6</sub>
Toxic Air Contaminants	TACs
Urban Water Management Plan	UWMP
Waste Discharge Requirements	WDR
Water Supply Assessment	WSA
Water Reclamation Plant	WRP
Water Vapor	H <sub>2</sub> O
Visual And Performing Arts	VAPA

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