September 2024 | Draft Environmental Impact Report
State Clearinghouse No. 2023120006

Irving Middle School
Major Modernization Project

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EXECUTIVE SUMMARY

ES.1 INTRODUCTION

To comply with the California Environmental Quality Act (CEQA), the Los Angeles Unified School District (LAUSD or District) has prepared the Draft Environmental Impact Report (EIR) for the Irving Middle School Major Modernization Project (proposed Project). The proposed Project would include renovations, modernizations, and new construction at Irving Middle School (Irving MS or Campus). LAUSD, as the Lead Agency, has prepared this Draft EIR to provide the public and local agencies with information about the potential effects on the local and regional environment associated with implementation of the proposed Project. This Draft EIR has been prepared in compliance with the CEQA of 1970 (as amended), codified at California Public Resources Code Sections 21000 et seq. and the CEQA Guidelines in the Code of Regulations, Title 14, Division 6, Chapter 3.

Irving MS is an operational middle school serving approximately 815 students in Grades 6–8 enrolled in a STEAM Magnet Program, approximately 375 students in Grades K–8 enrolled in ISANA Octavia Academy, and approximately 30 students in grades K–12 enrolled in City of Los Angels Community School. On October 12, 2021, the LAUSD Board of Education (Board) approved the project definition for site due diligence, planning, and feasibility activities for the proposed Project to identify and prioritize the improvements needed at the Campus. On November 15, 2022, the Board approved the redefinition of the Project to provide facilities that are safe, secure, and better aligned with the current instructional program. The proposed Project is designed to address the most critical physical conditions of the building and grounds at the Campus while providing renovations, modernizations, and reconfiguration as needed. This approval authorizes LAUSD's Facilities Services Division to proceed with Project design and the completion of related technical and regulatory processes including those required under CEQA.

The proposed Project is one of the major modernization projects under the District's School Upgrade Program (SUP). The SUP was initiated by the District in 2014 and updated in 2021 to integrate funding from Measure RR. Projects developed under the SUP framework focus on upgrading, modernizing, and replacing aging and deteriorating school facilities; updating technology; and addressing facilities inequities. The proposed Project has been developed under the LAUSD's SUP to provide Measure RR funding to give every student access to safe, secure, and updated schools. Irving MS was identified as one of seven schools in the District most in need of an upgrade due to the physical condition of the facilities.

ES.2 PROJECT OBJECTIVES

The primary objective of the proposed Project is to address the most critical physical conditions and essential safety of the site, which includes alleviating known seismic and structural risks on the Campus.

Four objectives have been established for the SUP and will aid decision-makers in their review of the Project and associated environmental impacts:

1. Repair aging schools and improve student safety.

2. Upgrade schools to modern technology and educational needs.

3. Create capacity to attract, retain, and graduate more students through a comprehensive portfolio of small, high-quality pre-K through adult schools.

4. Promote healthier environment through green technology.

Furthermore, the District has established six core principles/objectives for the scoping of major modernization projects:

1. Buildings meeting Assembly Bill (AB) 300 criteria for seismic evaluation may be addressed, to the extent feasible, with a focus on those determined to have a high seismic vulnerability, through retrofit, removal, or seismic modernization, which will be determined based on an assessment of the seismic vulnerability of the building(s), the historic context of the building/site, actual or potential impact to the learning environment, site layout, and the approach that best ensures compliance with Division of the State Architect (DSA) requirements.

2. The buildings, grounds, and site infrastructure that have significant/severe physical conditions that already do or are highly likely in the near future to pose a health and safety risk, or negatively impact a school's ability to deliver the instructional program and/or operate may be addressed by repair or replacement.

3. The District reliance on relocatable buildings, especially for K–12 instruction, should be reduced.

4. Necessary and prioritized upgrades must be made throughout the school site in order to comply with the program accessibility requirements of the Americans with Disabilities Act (ADA) Title II Regulations, and the District's Self-Evaluation and Transition Plan under Title II of the ADA.

5. The exterior conditions of the school site will be enhanced around new buildings and/or areas impacted by construction to improve the visual appearance including landscape and hardscape.

6. Outdoor learning environments will be developed where the site layout and project planning provide the opportunity.

ES.3 PROJECT LOCATION

Irving MS is located at 3010 Estara Avenue, in the neighborhood of Glassell Park within the City of Los Angeles in Los Angeles County, California 90065, approximately 4 miles north of downtown Los Angeles. The Campus is located about 16 miles northeast of the Pacific Ocean. Primary regional access to the site is provided by State Route 2 (SR-2) by exiting on San Fernando Road, traveling northwest on San Fernando Road for approximately 0.2 mile, and then traveling northeast on Fletcher Drive for approximately 0.2 miles. The Project site is bounded by Fletcher Drive to the northwest, Estara Avenue to the northeast, Marguerite Street to the southeast, West Avenue 32 to the southwest, and residential properties and neighborhood commercial properties in the western corner. The Assessor's Parcel Numbers (APNs) for the Project site are 5458-019-900 (main parcel), 5458-018-903 [southwest of Moss Avenue], 5458-018-904, 5458-018-905, 5458-018-906, 5458-018-907, 5458-018-908, 5458-018-909, 5458-018-910, 5458-018-911, 5458-018-912, 5458-018-913, 5458-018-914, 5458-018-915, 5458-018-916, and 5458-018-917. The Campus is located within the City of Los Angeles' Northeast Los Angeles Community Plan Area.

ES.4 PROJECT DESCRIPTION

The proposed Project involves building replacement and reconfiguration on the Irving MS Campus as part of the update to the SUP. The scope consists of the modernization of the Campus to facilitate a safe and secure campus that is better aligned with the current instructional program and meets current DSA requirements and educational specifications. Structurally vulnerable buildings located on an identified earthquake fault would be demolished and replaced by a new building that will improve educational quality and safety for students and staff. The proposed Project also includes essential upgrades including seismic retrofit of the Auditorium Building outside of the earthquake fault, the removal of barriers and other accessibility upgrades, and various landscape and hardscape improvements. The proposed Project would result in demolition and/or modifications to existing buildings, including historic buildings and resources. However, the Project would be designed to preserve and/or enhance character-defining features associated with the Campus, while avoiding the earthquake fault. Additionally, the proposed Project would be designed and implemented in a manner that complies with the LAUSD Design Guidelines and Treatment Approaches for Historic Schools. Upon completion of Project construction, the Project would reduce the total number of standard classrooms on the Campus from 65 to 46 to accommodate the long-term needs of the school and community, while providing additional outdoor learning and gathering spaces for its students. The proposed Project would include the following changes to Campus Buildings, described fully in **Chapter 2, *Project Description***.

- 62,442 square feet of permanent building demolition, located directly over the identified earthquake fault (Homemaking Building, Classroom Building, and Administration Building)
- 12,172 square feet of portable building removal, six relocatable buildings in the northwest corner of the Campus and one accessory service structure
- 62,000 square feet of new building construction:
    - One, approximately 56,000-square-foot, two-story building that would house 19 classrooms and support spaces, administration offices, library, and other building service spaces
    - One, approximately 2,500-square-foot, Maintenance and Operation (M&O) Building
    - One, approximately 3,500-square-foot, modular building accommodating two classrooms and support spaces to be used by the City of Angels Community School to the north of the identified fault and vacated Moss Avenue cul-de-sac
- 14,957 square feet of permanent building seismic retrofit for the Auditorium
- 64,485 square feet of existing building to remain

The proposed Project also provides for ADA upgrades impacted by the Project scope. Interim Housing would be provided to ensure school is fully operational throughout construction. After completion of the proposed Project, the City of Angels Community School program would remain elsewhere on Campus, and the Isana Octavia Charter School would be relocated off Campus. The proposed Project would not result in an increase in enrollment at Irving MS; it would modernize the existing school for the safety of existing students.

The proposed Project would improve portions of the parking lots and playgrounds that are located on District property. Any areas located directly above the fault would be transformed into outdoors areas, such as hardscape, landscape, or parking areas. The proposed Project does not anticipate any reconfiguration or relocation of the four existing vehicular points of entry. One new vehicular point of entry would be added along Marguerite Street to provide access to new parking stalls. With development of the proposed Project, all existing pedestrian points of entry would remain except for "Octavia Gate 3," which serves as the City of Angels Entrance along Fletcher Drive. This entrance would be relocated, as the City of Angels would be relocated on-campus.

On-campus circulation would be modified due to new and reconfigured landscaped, hardscaped, and parking areas on campus. Campus parking would be reduced from 149 existing spaces by 69 parking spaces during construction and replaced with 24 new parking spaces for an overall total of 104 parking spaces for the proposed Project. The proposed Project would remove approximately 45 parking spaces south of Roswell Street in order to accommodate the new Administration and Classroom Building. Additional parking spaces on the Campus may be removed and/or reconfigured to accommodate new landscaping or hardscape areas, such as basketball courts. Upon completion of the Project, the minimum parking requirements would be either met or exceeded. Required parking and adequate vehicle circulation also would be maintained throughout the duration of construction.

ES.5 SUMMARY OF IMPACTS

Table ES-1, *Summary of Impacts and Mitigation Measures for the Irving Middle School Major Modernization Project*, presents a summary of the impacts and mitigation measures identified in the Draft EIR. The detailed impact statements and mitigation measures are presented in **Chapter 3, *Environmental Analysis***. The level of significance for each impact was determined using significance criteria (thresholds) developed for each category of impacts; these criteria are presented in the appropriate sections of Chapter 3. Significant impacts are those adverse environmental impacts that meet, or exceed, the significance thresholds; less than significant impacts would not exceed the thresholds. Table ES-1 lists the mitigation measures that would avoid, minimize, or otherwise reduce significant impacts to less than significant levels.

The proposed Project would not be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5, and would not result in potentially significant, or cumulatively considerable, hazard impacts to the public or the environment. Potential significant impacts to cultural resources and hazards and hazardous materials have been identified. Mitigation measures have been incorporated into this Draft EIR to avoid or minimize impacts associated with these resources. However, even with implementation of mitigation measures, impacts would be significant and unavoidable for cultural resources (see **Table ES-1**).

TABLE ES-1
SUMMARY OF IMPACTS AND MITIGATION MEASURES FOR THE IRVING MIDDLE SCHOOL MAJOR MODERNIZATION PROJECT

Impacts	Significance before Mitigation	Mitigation Measures	Significance after Mitigation
3.1 Air Quality			
Project Impacts			
Impact 3.1-1: The proposed Project would not conflict with, or obstruct, implementation of the applicable air quality plan.	Less than Significant	No mitigation measures are required.	Less than Significant
Impact 3.1-1: The proposed Project would not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard.	Less than Significant	No mitigation measures are required.	Less than Significant
Impact 3.2-3: The proposed Project would not expose sensitive receptors to substantial pollutant concentrations.	Less than Significant	No mitigation measures are required.	Less than Significant
Cumulative Impacts			
The proposed Project would not result in a cumulatively considerable impact in relation to conflict with, or obstruct, implementation of the applicable air quality plan.	Less than Significant	No mitigation measures are required.	Less than Significant
The proposed Project would not result in a cumulatively considerable impact in relation to a net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard.	Less than Significant	No mitigation measures are required.	Less than Significant
The proposed Project would not result in a cumulatively considerable impact in relation to exposing sensitive receptors to substantial pollutant concentrations.	Less than Significant	No mitigation measures are required.	Less than Significant
3.2 Cultural Resources			
Project Impacts			
Impact 3.2-1: The proposed Project would not result in a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5.	Significant	**MM-CUL-1.** To communicate information on the historic development and character of Irving MS, including the Administration Building, an Interpretative Program shall be developed and implemented. This Interpretive Program shall be accessible to the general public and include information on the history and architecture of the Campus (both exterior and interior), from the founding of the City (1781, incorporated 1850) until 1939, when the contributing buildings were completed. A historical architect, historian, or architectural historian who meets the Secretary of the Interior's professional qualifications shall be engaged to research and write the information to be provided in the Interpretive Program. The Interpretive Program shall be initiated within 1 year of the approval of the proposed Project and shall be completed by substantial completion of construction.	Significant and Unavoidable
Cumulative Impacts			
The proposed Project would not result in a cumulatively considerable impact in relation to a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5.	Less than Significant	No mitigation measures are required.	Less than Significant

TABLE ES-1
SUMMARY OF IMPACTS AND MITIGATION MEASURES FOR THE IRVING MIDDLE SCHOOL MAJOR MODERNIZATION PROJECT

Impacts	Significance before Mitigation	Mitigation Measures	Significance after Mitigation
3.3 Greenhouse Gas Emissions			
Impact 3.3.1: The proposed Project would not generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment.	Less than Significant	No mitigation measures are required.	Less than Significant
Impact 3.3.2: The proposed Project would not conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases.	No Impact	No mitigation measures are required.	No Impact
Cumulative Impacts			
The proposed Project would not result in a cumulatively considerable impact in relation to generating greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment.	Less than Significant	No mitigation measures are required.	Less than Significant
The proposed Project would not result in a cumulatively considerable impact in relation to conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases.	No Impact	No mitigation measures are required.	No Impact

TABLE ES-1
SUMMARY OF IMPACTS AND MITIGATION MEASURES FOR THE IRVING MIDDLE SCHOOL MAJOR MODERNIZATION PROJECT

Impacts	Significance before Mitigation	Mitigation Measures	Significance after Mitigation
3.4 Hazards & Hazardous Materials			
Project Impacts			
Impact 3.4-1: The proposed Project would have the potential to create a significant hazard to the public or the environment through the routine transport, storage, production, use, or disposal of hazardous materials.	Significant	**MM-HAZ-1: Soil Management Plan.** A soil management plan shall be required for all earth-moving construction activities conducted at the site. The purpose of the soil management plan is to provide guidance for identifying impacted soil and the proper handling, onsite management, and disposal of impacted soil that may be encountered during construction activities. The soil management plan shall be prepared by a licensed State of California Civil Engineer or Professional Geologist. The soil management plan shall include the following sections at a minimum. • Introduction • Background • Potential Contaminants of Concern • Contaminated Soil Management • Health and Safety • Excavation/Grading Contractor • Identification of Contaminated Soil • Excavation and Handling of Contaminated Soil • Soil Staging • Dust Mitigation and Track-Out Controls • Stormwater Management • Waste Characterization and Profiling • Transportation Requirements and Procedures • Requirements for Haulers • Truck Loading Operations • Transportation Route • Traffic Control Procedures • Shipment Documentation • Contingency Plan • Soil Sampling and Analysis Protocol • Confirmation Soil Sampling • Screening Levels • Actions Based on Soil Results • Reporting • References Before excavation or other soil-disturbing activities begin, a preparatory inspection must be conducted by the Contractor to ensure the proper soil management provisions, including initiation of the DigAlert notification(s) and stormwater Best Management Practices (BMPs) are evaluated.	Less than Significant

TABLE ES-1
SUMMARY OF IMPACTS AND MITIGATION MEASURES FOR THE IRVING MIDDLE SCHOOL MAJOR MODERNIZATION PROJECT

Impacts	Significance before Mitigation	Mitigation Measures	Significance after Mitigation
		MM-HAZ-2: SCAQMD Rule 1166 Monitoring During Soil Excavation – Implementation of the soil management plan shall include precautions and monitoring for soil potentially impacted by chemicals of concern previously identified. This mitigation measure specifically addresses air monitoring requirements during the underground storage tank (UST) removal activities prior to excavation and grading activities conducted during building renovation. During the UST removal activities air monitoring shall be implemented using a Photo-ionization Detector (PID) to monitor for volatile organic compounds (VOCs). The PID shall have a 11.7 eV lamp and shall be calibrated daily using the manufacturer suggested calibration gas. If soil releasing VOCs above 50 parts per million by volume (ppmv) is identified, the South Coast Air Quality Management District (SCAQMD) shall be notified regarding the renovation work at the subject property. A site-specific permit shall be obtained for the Project due its location at a school property. Excavation activities shall be performed in compliance with all applicable SCAQMD regulations.	
		MM-HAZ-3: Dust Control Plan – A dust control plan shall be required for all construction activities conducted on the site. The primary dust control requirement is for no visible dust to exit the site during construction activities. Dust control measures will be required daily during earth-moving activities to limit emissions of fugitive dust generated by their activities. The contractor is responsible for meeting requirements specified in Rule 403 and implementing reasonable Best Available Control Measures (BACMs) to minimize dust emissions. The following dust control measures shall be implemented to stabilize exposed surfaces and minimize suspended or tracked dust particles: • Apply water to excavation areas to minimize dust generated by vehicles, trucks, and heavy equipment. • Apply water to the staged soil piles before and during loading of trucks, and after completion of loading for the day. • Adequately tarp truck trailers, and clean truck tires as necessary prior to leaving the Site. Place shaker plates on the ingress and egress routes to the Site. • Cover and secure staged soil piles at the end of each day. Wind speed and wind direction shall be monitored at 15-minute intervals using a tripod-mounted weather station with data logging capabilities. Airborne particulate monitoring shall be conducted with aerosol monitors near the property boundary at locations upwind (one) and downwind (one) of excavation activities with an aggregate particle diameter of 10 microns or less (PM_{10}). The monitors shall provide real-time concentration and median particle size information and shall log the data at one-minute intervals for the duration of the monitoring period. The dust monitors shall be zeroed daily and an action level of 25 micrograms per cubic meter ($\mu g/m^3$) (per Rule 1466) shall be established and measured as the difference between upwind and downwind monitors.	
		MM-HAZ-4: Compliance Inspections – Site compliance inspections of the working areas shall be conducted by the Environmental Consultant or designated site manager to determine if any failed compliance has occurred. Stop-work orders shall be promptly issued if any failed compliance has occurred and corrective actions shall be immediately implemented to address the noncompliant issue.	
Impact 3.4-2: The proposed Project would have the potential to create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials or waste into the environment.	Significant	Mitigation Measures MM-HAZ-1 through MM-HAZ-4, listed above, would reduce pre-construction and construction hazard impacts.	Less than Significant
Impact 3.3-3: The proposed Project would have the potential to emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.	Significant	Mitigation Measures MM-HAZ-1 through MM-HAZ-4 would reduce pre-construction and construction hazard impacts.	Less than Significant

TABLE ES-1
SUMMARY OF IMPACTS AND MITIGATION MEASURES FOR THE IRVING MIDDLE SCHOOL MAJOR MODERNIZATION PROJECT

Impacts	Significance before Mitigation	Mitigation Measures	Significance after Mitigation
Impact 3.3-4: The proposed Project would be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code § 65962.5 and, as a result, would it create a significant hazard to the public or the environment.	Significant	Mitigation Measures MM-HAZ-1 through MM-HAZ-2 would reduce pre-construction and construction hazard impacts.	Less than Significant
Cumulative Impacts			
The proposed Project would not result in a cumulatively considerable impact in relation to creating a significant hazard to the public or the environment through the routine transport, storage, production, use, or disposal of hazardous materials.	Less than Significant	No mitigation measures are required.	Less than Significant
The proposed Project would not result in a cumulatively considerable impact in relation to reasonably foreseeable upset and accident conditions involving the release of hazardous materials or waste into the environment.	Less than Significant	No mitigation measures are required.	Less than Significant
The proposed Project would not result in a cumulatively considerable impact in relation to emitting hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.	Less than Significant	No mitigation measures are required.	Less than Significant
The proposed Project would not create a cumulatively considerable impact in relation to being located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code § 65962.5 and, as a result, would it create a significant hazard to the public or the environment.	No Impact	No mitigation measures are required.	No Impact
3.5 Noise			
Project Impacts			
Impact 3.5-1: The Project would not result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or in other applicable local, state, or federal standards.	Less than Significant	No mitigation measures are required.	Less than Significant
Impact 3.5-2: The Project would not result in generation of excessive groundborne vibration or groundborne noise levels.	Less than Significant	No mitigation measures are required.	Less than Significant
Cumulative Impacts			
The proposed Project would not result in a cumulatively considerable impact in relation to generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or in other applicable local, state, or federal standards.	Less than Significant	No mitigation measures are required.	Less than Significant
The proposed Project would not result in a cumulatively considerable impact in relation to generation of excessive groundborne vibration or groundborne noise levels.	Less than Significant	No mitigation measures are required.	Less than Significant
3.6 Pedestrian Safety			
Project Impacts			
Impact 3.6-1: The Project would not substantially increase vehicular and/or pedestrian safety hazards due to a design feature or incompatible uses.	Less than Significant	No mitigation measures are required.	Less than Significant
Impact 3.6-2: The Project would not create unsafe routes to schools for students walking from local neighborhoods.	Less than Significant	No mitigation measures are required.	Less than Significant
Impact 3.6-3: The Project would not be located on a site that is adjacent to or near a major arterial roadway or freeway that may pose a safety hazard.	Less than Significant	No mitigation measures are required.	Less than Significant
Cumulative Impacts			
The proposed Project would not result in a cumulatively considerable impact in relation to substantially increasing vehicular and/or pedestrian safety hazards due to a design feature or incompatible uses.	Less than Significant	No mitigation measures are required.	Less than Significant

TABLE ES-1
SUMMARY OF IMPACTS AND MITIGATION MEASURES FOR THE IRVING MIDDLE SCHOOL MAJOR MODERNIZATION PROJECT

Impacts	Significance before Mitigation	Mitigation Measures	Significance after Mitigation
The proposed Project would not result in a cumulatively considerable impact in relation to creating unsafe routes to schools for students walking from local neighborhoods.	Less than Significant	No mitigation measures are required.	Less than Significant
The proposed Project would not result in a cumulatively considerable impact in relation to being located on a site that is adjacent to or near a major arterial roadway or freeway that may pose a safety hazard.	Less than Significant	No mitigation measures are required.	Less than Significant
3.7 Transportation & Traffic			
Project Impacts			
Impact 3.7-1: The Project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities.	Less than Significant	No mitigation measures are required.	Less than Significant
Impact 3.7-3: The Project would not substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).	Less than Significant	No mitigation measures are required.	Less than Significant
Impact 3.7-4: The Project would not result in inadequate emergency access.	Less than Significant	No mitigation measures are required.	Less than Significant
Cumulative Impacts			
The proposed Project would not result in a cumulatively considerable impact in relation to conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities.	Less than Significant	No mitigation measures are required.	Less than Significant
The proposed Project would not result in a cumulatively considerable impact in relation to substantially increasing hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).	Less than Significant	No mitigation measures are required.	Less than Significant
The proposed Project would not result in a cumulatively considerable impact in relation to inadequate emergency access.	Less than Significant	No mitigation measures are required.	Less than Significant

ES.6 AREAS OF KNOWN CONTROVERSY

Pursuant to Section 15123(b)(2) of the CEQA Guidelines, a lead agency is required to include areas of controversies raised by agencies and the public during the scoping process for an EIR. Areas of controversy have been identified for this EIR based on comments made during the 30-day public scoping period for the NOP (see **Appendix A, *Initial Study***; **Appendix B, *Notice of Preparation***; **Appendix C, *Scoping Period Comments***). Commenting parties have expressed concern for air quality, hazards and hazardous materials, pedestrian safety and traffic, and historical resources. Concerns were related to construction activities occurring during the school year near sensitive receptors and the removal of the eligible historic contributor Administration Building. These issues have been considered during preparation of this Draft EIR.

ES.7 PROJECT ALTERNATIVES

Two alternatives to the proposed Project are analyzed in this EIR. The goal for evaluating alternatives is to identify ways to avoid or lessen the significant environmental effects resulting from implementation of the proposed Project, while attaining most of the Project objectives. The following provides a summary of each of the alternatives analyzed.

- **Alternative 1: No Project/No Build Alternative.** The No Project/No Build Alternative assumes that the Project site would remain as it is in existing conditions. No demolition or construction of new buildings would occur on the Project site, and the existing facilities and infrastructure would continue to be susceptible to seismic damage and deterioration. The Campus would continue to rely on portable classroom buildings and existing classrooms would remain undersized and compromised without specialty spaces. Only essential repairs such as repair of portable classrooms, replacement of lead pipes, and maintenance of fire alarm and fire suppression systems would occur over time.
- **Alternative 2: Retain Entire Existing Administration Building.** This alternative would retain the exterior aesthetic of the 1936 Administration Building, which is one of the original Campus structures and exemplifies the PWA Moderne architectural style. The distinctive features of horizontal lines, rhythmic façade, symmetry, and central entry point would be retained under this alternative, which has been considered for its potential to reduce significant impacts of the proposed Project to historic resources. It should be noted, however, that Section CAC 4-317(c) of the California Building Code indicates that no school building shall be constructed, rehabilitated (i.e., seismic retrofit), reconstructed, or relocated within 50 feet of the trace of an active fault. Under this alternative, two permanent buildings (Homemaking Building and Classroom Building) would be demolished, and two new structures (M&O #1 and Modular Classroom Building for City of Angels) would be constructed. There would be no change in the square footage of portable buildings removed or existing buildings to remain as-is on Campus.

Chapter 5, Alternatives Analysis, Sections 5.6 and 5.7, provide a comparative summary of the alternatives, including a summary of the ability of the alternatives to meet the Project objectives and a summary comparison of the potential impacts associated with each alternative and the proposed Project.

The No Project/No Build Alternative (Alternative 1) would reduce, or eliminate, all proposed Project impacts. The implementation of Alternative 1 would result in fewer environmental impacts compared to the proposed Project. However, Alternative 1 would result in greater impacts related to geology and soils (seismic risk) and would not meet any of the Project objectives.

Alternative 2 would be the environmentally superior alternative as it would result in the greatest reduction in air quality, cultural resources, and greenhouse gas emissions impacts, compared to the proposed Project. With implementation of Alternative 2, the significant and unavoidable impacts to cultural resources associated with development of the proposed Project would be reduced to less than significant with the retention of the Administration Building. However, Alternative 2 would be inconsistent with Objective #1, which would not be entirely met (see Table 5-3). The intent of the objectives is to increase safety for staff and students by providing upgraded buildings and to reduce the reliance on portable buildings. Further, the objectives aim to provide larger classroom spaces that could accommodate modern and efficient technology, which would not be met with Alternative 2. Therefore, Alternative 2 would meet some of the objectives but not to the same degree as the proposed Project.

ES.8 ISSUES TO BE RESOLVED

Per CEQA Guidelines Section 15123(b)(3), issues must be resolved including the choice among alternatives and whether or how to mitigate the significant effects. The impact analysis in the Draft EIR found that the proposed Project would result in less than significant impacts after incorporation of mitigation measures in relation to hazards and hazardous materials. After implementation of Standard Conditions (SCs) and mitigation measures, impacts to cultural resources in relation to eligibility of the Washington Irving Middle School Historic District for the National Register of Historic Places would remain significant and unavoidable. For all other environmental issues evaluated in the Draft EIR, impacts were determined to be less than significant.

Impacts to cultural resources would be reduced to a less than significant level under Alternative 2, which would therefore be the environmentally superior alternative. But this alternative would be inconsistent with Objective #1, which would not be entirely met (see Table 5-3). The intent of the objectives is to increase safety for staff and students by providing upgraded buildings and to reduce the reliance on portable buildings. Further, the objectives aim to provide larger classroom spaces that could accommodate modern and efficient technology, which would not be entirely met with Alternative 2. Therefore, this alternative would meet some of the objectives but not to the same degree as the proposed Project. There are no other issues to be resolved.

CHAPTER 1
Introduction

1.1 Purpose of the EIR

The Los Angeles Unified School District (LAUSD or District) is proposing a major modernization of Washington Irving Middle School (Irving MS) (proposed Project), located at 3010 Estara Avenue, in the City of Los Angeles, Los Angeles County, California. Major modernization projects are designed to address the most critical physical needs of the building and grounds at the Irving MS Campus (Campus) through building replacement, renovation, modernization, and reconfiguration. The proposed Project is required to undergo an environmental review pursuant to the California Environmental Quality Act (CEQA). This Draft Environmental Impact Report (EIR) provides an evaluation of the potential environmental consequences associated with this proposed Project.

1.2 Intended Use of the EIR

This EIR provides information to the public and public agency decision-makers about the environmental effects that could result from the proposed Project, as well as mitigation that would reduce those effects. Section 15161 of the CEQA Guidelines states that a project EIR "should focus primarily on the changes in the environment that would result from the development project. The EIR shall examine all phases of the project including planning, construction, and operation."[1]

1.3 CEQA Environmental Review Process

1.3.1 CEQA Process Overview

The environmental compliance process is governed by CEQA[2] and the State CEQA Guidelines.[3] CEQA was enacted in 1970 by the California Legislature to disclose to decision-makers and the public the significant environmental effects of projects and to identify ways to avoid or reduce the environmental effects through feasible alternatives and/or mitigation measures. Compliance with CEQA applies to California government agencies at all levels: local, regional, and State agencies, boards, commissions, and special districts (such as school districts and water districts). LAUSD is the lead agency for this proposed Project and is, therefore, required to conduct an environmental review to analyze its environmental effects.

California Public Resources Code (PRC) Section 21080(a) states that analysis of a project's environmental impact is required for any "discretionary projects proposed to be carried out or approved by public agencies." In this case, LAUSD has determined that an Initial Study is required to determine whether there is substantial

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

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

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

evidence that construction and operation of the proposed Project would result in environmental impacts. An Initial Study is a preliminary environmental analysis to determine whether an EIR, a mitigated negative declaration (MND), or a negative declaration (ND) is required for a project.[4]

When an Initial Study identifies the potential for significant environmental impacts, the lead agency must prepare an EIR;[5] however, if all impacts are found to be less than significant or can be mitigated to a less than significant level, the lead agency can prepare an ND or MND.[6]

A "project" means the whole of an action that could result in either a direct physical change in the environment, or a reasonably foreseeable indirect physical change in the environment, and that is any of the following (CEQA Guidelines Section 15378(a)):

1) An activity directly undertaken by any public agency including but not limited to public works construction and related activities clearing or grading of land, improvements to existing public structures, enactment and amendment of zoning ordinances, and the adoption and amendment of local General Plans or elements thereof pursuant to Government Code Sections 65100-65700.

2) An activity undertaken by a person which is supported in whole or in part through public agency contacts, grants, subsidies, loans, or other forms of assistance from one or more public agencies.

3) An activity involving the issuance to a person of a lease, permit, license, certificate, or other entitlement for use by one or more public agencies.

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

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

This EIR includes information necessary for agencies to meet statutory responsibilities related to the proposed Project. State and local agencies will use the EIR when considering any permit or other approvals necessary to implement the Project. The environmental topics that have been identified for study in the EIR are:

[4] California Code of Regulations, Title 14, Division 6, Chapter 3, §15063.

[5] California Code of Regulations, Title 14, Division 6, Chapter 3, §15064.

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

- Air Quality
- Cultural Resources
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Noise
- Pedestrian Safety
- Transportation and Traffic.

Following consideration of public comments on the Initial Study, this Draft EIR has been prepared and circulated to the public and affected agencies for review and comment. One of the primary objectives of CEQA is to include public participation in the planning process; public involvement is an essential feature of CEQA. Community members are encouraged to participate in the environmental review process, request to be notified, monitor newspapers for formal announcements, and submit substantive comments at every possible opportunity afforded by LAUSD. The environmental review process provides several opportunities for the public to participate through public notice and public review of CEQA documents and public meetings. Additionally, LAUSD is required to consider comments from the scoping process in the preparation of the Draft EIR and to respond to Draft EIR public comments in the Final EIR.

This type of project is one of many that were analyzed in the 2023 Subsequent Program EIR (SPEIR) that was certified by the LAUSD BOE on December 12, 2023,[7] which replaced the previous School Upgrade Program (SUP) Program EIR that had been in effect since 2015[8] and was the governing Program EIR at the time the Notice of Preparation and Initial Study for the Project were issued. LAUSD's SUP Program EIR meets the criteria for a Program EIR under CEQA Guidelines Section 15168 (a)(4) as one "prepared on a series of actions that can be characterized as one large project and are related … [a]s individual activities carried out under the same authorizing statutory or regulatory authority and having generally similar environmental effects which can be mitigated in similar ways."

The 2023 SPEIR enables LAUSD to streamline future environmental compliance and reduces the need for repetitive environmental studies.[9] The 2023 SPEIR serves as the framework and baseline for CEQA analyses of later projects through a process known as "tiering." Under CEQA Guidelines Sections 15152(a) and 15385, "tiering" refers to using the analysis of general matters contained in a broader EIR (such as one prepared for a program) with later EIRs and negative declarations on narrower projects; incorporating by reference the general discussions from the broader EIR; and concentrating the later EIR or negative declaration solely on the issues specific to the later project.[10]

[7] Los Angeles Unified School District. 2023. *Subsequent Program EIR for the School Upgrade Program*. http://achieve.lausd.net/ceqa.

[8] Los Angeles Unified School District. 2015. *Program EIR for the School Upgrade Program. Report*. http://achieve.lausd.net/ceqa.

[9] Los Angeles Unified School District. 2023. *Subsequent Program EIR for the School Upgrade Program*. http://achieve.lausd.net/ceqa.

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

The 2023 SPEIR is applicable to all projects implemented under the SUP. The 2023 SPEIR provides the framework for evaluating environmental impacts related to ongoing facility upgrade projects planned by the District.[11] Due to the extensive number of individual projects anticipated to occur under the SUP, projects were grouped into four categories based on project scope, type of construction and location of project. The four categories of projects are as follows:[12]

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

The proposed Project is categorized as Type 2 – New Construction on Existing Campus, which includes demolition and new building construction on existing campuses and the replacement of school buildings on the same location; and Type 3 – Modernization, Repair, Replacement, Upgrade, Remodel, Renovation, and Installation, which includes modernization and infrastructure upgrades. The evaluation of environmental impacts related to Type 2 and Type 3 projects, and the appropriate project design features and mitigation measures to incorporate, are provided in the 2023 SPEIR.

The proposed Project is considered to be a site-specific project under the 2023 SPEIR; therefore, this EIR is tiered from the 2023 SPEIR. The 2023 SPEIR is available for review online at http://achieve.lausd.net/ceqa and at LAUSD's Office of Environmental Health and Safety, 333 South Beaudry Avenue, 21st Floor, Los Angeles, CA 90017.

1.3.2 Notice of Preparation and Public Scoping

Under Section 150282 of the CEQA Guidelines, the lead agency is required to send a Notice of Preparation (NOP) that states that a Draft EIR will be sent to the state Office of Planning and Research (OPR), responsible and trustee agencies, and federal agencies involved in the approval or funding of the proposed Project. Sufficient information must be provided in the NOP for responsible agencies to respond meaningfully. The NOP must include a description of the project, location of the project, and probable environmental effects of the project (CEQA Guidelines Section 15082(a)(1)). Within 30 days of receiving the NOP, responsible and trustee agencies and the OPR shall provide the lead agency with specific details about the scope and context of the environmental information related to statutory responsibility of the area. This information must be included within the Draft EIR, per CEQA Guidelines Section 15082(b)).

In accordance with Section 15063 and 15082 of the CEQA Guidelines, LAUSD published an NOP for the Draft EIR on December 1, 2023, and circulated it to government agencies, elected officials, organizations, and persons who may be interested in the proposed Project, which includes nearby residents, property owners, student parents/ legal guardians, and teachers/ staff(Appendix 2, *Notice of Preparation*). The NOP requested

[11] Ibid, at 4-8.

[12] Ibid, at 1-7.

comments on the scope of the Draft EIR and asked those agencies with regulatory authority over any aspect of the Project to describe that authority. The NOP provided a general description of the proposed actions, a description of the Project area, and a preliminary list of potential environmental impacts.

On Wednesday, December 6, 2023, in accordance with CEQA Section 21083.9, LAUSD sponsored a public scoping meeting to obtain comments from interested parties regarding the scope of the Draft EIR. The scoping meeting presentation included an overview of the proposed Project and a summary of the findings contained in the Initial Study. The issues raised by participants are summarized and included in this Draft EIR. Five comment letters were received in response to the NOP, two comment cards were provided during the public scoping meeting, and a transcript from the public scoping meeting recorded verbal comments (see Appendix 3, *Scoping Comments*). Comments received noting concern over environmental impacts related to the Project are discussed in **Table 1.3-1, Summary of NOP Comments**.

State CEQA Guidelines Section 15083 encourages early consultation with interested parties to help identify "the range of actions, alternatives, mitigation measures, and significant effects to be analyzed in depth in an EIR and in eliminating from detailed study issues found not to be important." The revised Project Description is detailed in Chapter 2 of the Draft EIR.

TABLE 1.3-1
SUMMARY OF NOP COMMENTS

Commenter/Date	Summary of Environmental Issues Raised in Comment Letters	Applicable Draft EIR Sections
Notice of Preparation - December 6, 2023, Agencies		
California Department of Transportation (Caltrans), January 5, 2024	The commenter makes suggestions as to what elements are to be addressed in the EIR, such as safety recommendations for traffic, pedestrian, and bicycle safety during construction and operation of the project. Consideration of multi-modal improvements.	Section 3.6, *Pedestrian Safety*; Section 3.7, *Transportation and Traffic.*
Native American Heritage Commission (NAHC), December 1, 2023	Recommends consultation with California Native American Tribes traditionally and culturally affiliated with the geographic are of the project under Assembly Bill (AB) 52 Tribal consultation requirements for CEQA and Impacts to Tribal Cultural Resources. Provides NAHC recommendations for Cultural Resources Assessments.	As stated in Section 2, *Environmental Setting*, of the Initial Study (Appendix 2 to the EIR), pursuant to AB 52, LAUSD notified the Native American tribes/tribal representatives that are traditionally and culturally affiliated with the Project area. No Native American tribes have requested consultation with LAUSD, pursuant to PRC Section 21080.3.1. LAUSD Office of Environmental Health and Safety (OEHS) contacted the NAHC regarding all of the Major Modification Projects. NAHC provided the list of tribes affiliated within the area of all seven of the Major Modernization Projects. On August 25, 2023, letters requesting consultation were sent via email to all of the tribes listed in the letter from the NAHC. Tribes had 30 days to request consultation regarding any or all of the Projects. The 30-day period has ended, and no requests were

TABLE 1.3-1
SUMMARY OF NOP COMMENTS

Commenter/Date	Summary of Environmental Issues Raised in Comment Letters	Applicable Draft EIR Sections
		received. This topic was not carried forward in the EIR, as stated in Section XIX, *Tribal Cultural Resources*, of the Initial Study. LAUSD Standard Conditions of Approval from the SUP SC-TCR-1 and SC-TCR-2 would be required.
California Department of Toxic Substances Control (DTSC), December 21, 2023	Requests consideration that if the District plans to use California Department of Education (CDE) fund that the Project shall comply with requirements California Education Code Sections 17210, 17213.1, and 17213.2, unless otherwise exempt under Section 17268. Requests that the district enter into an Environmental Oversight Agreement with DTSC if applicable. Requests that if demolition is to occur, surveys are done for presence of lead-based paints, mercury, asbestos, or polychlorinated biphenyl caulk, with the removal of these materials if they are found for CEQA compliance. Requests that all imported soil and fill material be tested to ensure any contaminants are within approval screening levels for intended land use, as well as additional documentation and screening of soil and fill.	Section 3.4, *Hazards and Hazardous Materials*.
Scoping Meeting – December 6, 2023, Comment Card Individuals		
Aura E. Gonzalez	No concerns. Meeting was very informative.	N/A.
Maria E. Barboza	Comment related to outreach in order to prepare local families of incoming sixth and seventh graders for assisting parents, deadlines, and transition within the district during planned construction.	LAUSD has received the request and will add outreach to incoming sixth and seventh graders with planned construction notices.
Scoping Meeting – December 6, 2023, Verbal Comment Individuals		
Janet Chu	Comment related to interim earthquake safety concern before project implementation starts. Comment requesting consideration of construction scheduling so that the bulk will happen on weekends and over the summer.	The school would continue to follow earthquake safety protocols contained in the Integrated Safe School Plan. Chapter 3.5, *Noise* (SC-N-4, 8, and 9).
Samantha Fuentes	Comment asking what “New City of Angels” means. Comment asking for clarification regarding construction times – during school hours or after school	Chapter 2, *Project Description* (City of Angels Community School; removal of existing classrooms and new classrooms would be provided as part of project). Chapter 2, *Project Description* (construction would be conducted during and after school hours).

TABLE 1.3-1
SUMMARY OF NOP COMMENTS

Commenter/Date	Summary of Environmental Issues Raised in Comment Letters	Applicable Draft EIR Sections
Christine Louise Mills	Comments requesting IT support during public scoping meeting.	N/A.
Emily Bills	Comment requesting more information regarding mitigation of toxic lead and other dust created by the demolition, including where the specific protocol for demolition and containment of dust/debris created by demolition (concerns about lead dust in particular). Comment requesting where documentation of air quality on the temporary classroom buildings for volatile organic compounds (VOCs) etc.	Section 3.4, *Hazards and Hazardous Materials*, and Appendix 4, *Irving MS Soil Removal Plan.* Section 3.1, *Air Quality*.
Lenni L	Concern about whether construction would impact ability to host tournaments, dance recitals, and other events at the current gym.	Chapter 2, *Project Description* (the Physical Education Building, which is not located on the fault, would remain as-is).
Laura and Ray Montenegro	Comment about how LAUSD will receive and incorporate student and teacher ideas into the design process.	N/A. Students and teachers should reach out to the Principal to share ideas and feedback so they can be relayed to the project team during design. Principal will be involved in the design process to provide feedback.
Elizabeth	Comment about concerns regarding construction dust impacts on neighbors, rat infestations effects from demolition, sidewalk fixes, and additional nighttime lighting needed when kids get out at 6 pm. Comment with concerns about lead, dust, and asbestos hazards from construction in the neighborhood. Comment that City of Los Angeles is not doing anything about the sidewalks. Comment that the (rat) infestation was not addressed. It is going to get worse with the demolition.	Section 3.1, *Air Quality*, and Chapter 2, *Project Description*. Section 3.4, *Hazards and Hazardous Materials*, and Appendix 4, *Irving MS Soil Removal Plan.* N/A. LAUSD has received the request and will forward the request to the City of Los Angeles Department of Transportation. Chapter 2, *Project Description*.
Heather Melish	Comment about whether the budget for the design of the new construction includes ornamentation to meet the quality of the existing building. Comment asking whether there is any art component to the project.	Chapter 2, *Project Description*.
Individuals		
Sarah J Bartlett, January 3, 2024	Requests that the EIR evaluate rehabilitation alternative to demolition. Irving MS was chosen due to historical character and older tree cover on campus; new construction will change character. Concerned that new construction will still be within the fault	Chapter 5, *Alternatives Analysis*; and Appendix 5, *Historical Resources Technical Report* (HRTR).

TABLE 1.3-1
SUMMARY OF NOP COMMENTS

Commenter/Date	Summary of Environmental Issues Raised in Comment Letters	Applicable Draft EIR Sections
	zone. Requests detailed timeline of proposed Project out of concern that Project plans were made before geologic study.	
Peter Benoit, January 1, 2023	Concerned that the district has not conducted a reasonable study with proposed alternate retrofit/upgrade approach. Request that District and associated agencies study a preservation option that retrofits and or upgrades the 1939 Moderne New Deal Era Public Works Administration-built structure.	Chapter 5, *Alternatives Analysis*; and Appendix 5, HRTR.

1.3.3 Draft EIR

The Draft EIR has been prepared pursuant to the requirements of CEQA Guidelines Section 15126. The environmental issues addressed in this Draft EIR were established through review of environmental documentation developed for the Project, environmental documentation for nearby projects, and public and agency responses to the NOP. This Draft EIR provides an analysis of reasonably foreseeable impacts associated with the construction and operation of the proposed Project. The environmental baseline for determining potential impacts is the date of publication of the NOP (CEQA Guidelines Section 15125(a)). Unless otherwise indicated, the environmental setting for each resource assessed in this Draft EIR describes the existing conditions as of January 2024. The impact analysis is based on changes to existing conditions that would result from implementation of the proposed Project.

In accordance with CEQA Guidelines Section 15126, the Draft EIR describes the proposed Project and the existing environmental setting, identifies environmental impacts associated with Project implementation, identifies mitigation measures for significant impacts, and provides an analysis of alternatives. Significance thresholds have been developed for each environmental resource analyzed in this Draft EIR (see Chapter 3).

1.3.4 Public Review

In accordance with CEQA Guidelines Section 15105, this Draft EIR is being circulated and made available to local, state, federal agencies, and interested organizations and individuals who may wish to review and comment on it during the 45-day review period. All written comments should be directed to:

Edward Paek, AICP
Los Angeles Unified School District – Office of Environmental Health & Safety
333 South Beaudry Avenue, 21st Floor
Los Angeles, CA 90017

Comments on the Draft EIR must be received by close of business on the last day of the 45-day review period.

1.3.5 Final EIR Publication and Certification

Written and oral comments received in response to the Draft EIR will be addressed in a Response to Comments document that, together with the Draft EIR, will constitute the Final EIR. The LAUSD Board will then consider EIR certification (CEQA Guidelines Section 15090). If the EIR is certified, the Board may consider Project approval. Prior to approving the Project, LAUSD must make written findings with respect to each significant environmental effect identified in the Draft EIR in accordance with Section 15091 of the CEQA Guidelines. In addition, LAUSD must adopt a Statement of Overriding Considerations concerning each unmitigated significant environmental effect identified in the Final EIR (if any). The Statement of Overriding Considerations would be included in the record of the Project's approval and mentioned in the Notice of Determination (NOD) following CEQA Guidelines Section 15093(c). Pursuant to Section 15094 of the CEQA Guidelines, LAUSD will file a NOD with the State Clearinghouse and Los Angeles County Clerk within five working days after Project approval.

1.3.6 Mitigation Monitoring and Reporting Program

CEQA requires lead agencies to "adopt a reporting and mitigation monitoring program for the changes to the Project which it has adopted or made a condition of Project approval in order to mitigate or avoid significant effects on the environment" (CEQA Guidelines Section 15097). The mitigation monitoring program will be available to the public at the same time as the Final EIR.

1.3.7 Standard Conditions of Approval

LAUSD Standard Conditions of Approval (SC) are uniformly applied development standards and were updated in 2023[13] in order to incorporate and reflect changes in the recent laws, regulations and the LAUSD's standard policies, practices and specifications.[14] The SCs were compiled from established LAUSD standards, guidelines, specifications, practices, plans, policies, and programs, as well as typically applied mitigation measures. The SCs are divided into 16 of the 21 LAUSD CEQA environmental topics (Appendix G of the CEQA Guidelines and Pedestrian Safety). For each SC, compliance is triggered by factors such as the project type, existing conditions, and type of environmental impact. Compliance with every SC is not required.

1.4 Organization of the EIR

This Draft EIR is organized into the following chapters and appendices:

ES. Executive Summary. The summary provides a synopsis of the Project's impacts. It identifies, in an overview fashion, the Project under consideration and its objectives. The section also summarizes the

[13] Los Angeles Unified School District (LAUSD). Standard Conditions of Approval for District Construction, Upgrade, and Improvement Projects. Accessed January 24, 2024. Available at: https://www.lausd.org/cms/lib/CA01000043/Centricity/domain/135/ceqa/2023_Standard_Conditions_UPDATE_Final.pdf

[14] Los Angeles Unified School District (LAUSD). Standard Conditions of Approval for District Construction, Upgrade, and Improvement Projects. Accessed January 24, 2024. Available at: https://www.lausd.org/cms/lib/CA01000043/Centricity/domain/135/ceqa/2023_Standard_Conditions_UPDATE_Final.pdf

Project's impacts and mitigation measures and contains a summary analysis of the alternatives to the Project.

1. **Introduction.** The introduction includes the purpose of an EIR and procedural information.

2. **Project Description.** The Project description includes the Project background, Project location and setting, site characteristics, Project objectives, and the characteristics of the Project. The section also includes a summary of the necessary permits and approvals for the Project.

3. **Environmental Analysis.** This chapter describes the environmental setting and identifies impacts of the proposed Project for each of the following environmental resource areas: Air Quality, Cultural Resources, Greenhouse Gas Emissions, Hazards and Hazardous Materials, Noise, Pedestrian Safety, and Transportation and Traffic. Mitigation measures to reduce significant impacts of the proposed Project are presented for each resource area. This section also provides an analysis of the cumulative impacts for each issue area analyzed in the Draft EIR.

4. **Other CEQA Considerations.** This chapter provides an analysis of the extent to which the Project's primary and secondary effects would commit resources to uses that future generations would probably be unable to reverse. This chapter also discusses the resource areas determined to have no impact with implementation of the Project.

5. **Alternatives.** This chapter presents an overview of the alternatives development process and describes and analyzes the alternatives to the Project, including the No Project Alternative.

6. **Report Preparation.** This chapter provides a list of the individuals who contributed to the preparation of the Draft EIR.

7. **Appendices.** The appendices contain important information used to support the analyses and conclusions made in the EIR.

    - Appendix 1: Initial Study
    - Appendix 2: Notice of Preparation
    - Appendix 3: Scoping Comments
    - Appendix 4: Soil Removal Plan
    - Appendix 5: Historical Resources Technical Report
    - Appendix 6: Emissions Calculations
    - Appendix 7: Noise Background and Modeling Data
    - Appendix 8: Pedestrian and Safety Study for Washington Irving Middle School Major Modernization Project
    - Appendix 9: Alternatives Analysis Support Documents

CHAPTER 2
Project Description

2.1 Introduction

The purpose of the project description is to explain the proposed Project in a way that is meaningful to the public, reviewing agencies, and decision makers. As described in Section 15124 of the CEQA Guidelines, the project description in an EIR is required to contain the following information: (1) the location and boundaries of the proposed Project; (2) a statement of Project objectives; (3) a general description of the Project's technical, economic, and environmental characteristics, including a consideration of the supporting public service facilities; and (4) a statement briefly describing the intended uses of the EIR. The CEQA Guidelines state that a project description need not supply extensive detail beyond that needed for the evaluation and review of the environmental impact.

The proposed Project would include renovations, modernizations, new construction, and demolition at Irving MS to address the most critical physical conditions and essential safety issues of the school's buildings and grounds, further described below.

2.2 Background

The LAUSD bond program began in 1997 with the initial focus on addressing overcrowded conditions—including the use of year-round multitrack calendars and busing of students to less crowded campuses—by providing new schools with traditional calendars. This goal was met with the opening of 131 new schools for K–12 students, allowing students to attend schools in their neighborhoods operating on a two-semester, single-track calendar. Since the completion of the New School Construction Program, the District's focus has shifted from constructing new facilities to correct decades of overcrowding, to addressing aging existing school facilities. The District's priority is to upgrade existing facilities and provide additional facilities to achieve the educational benefits of smaller learning environments.[1]

In 2014, the District embarked on a new bond program known as the School Upgrade Program (SUP). Projects developed under the SUP framework focus on upgrading, modernizing, and replacing aging and deteriorating school facilities; updating technology; and addressing facilities inequities. Initially in 2014, $7.85 billion was allocated for the development of school projects. Since that time, new sources of funds have been allocated to the program, increasing the total amount of funds to support the development of projects to $9.2 billion. To date, nearly 2,000 projects valued at approximately $1.5 billion have been funded by the SUP and completed by LAUSD Facilities, and nearly 690 additional projects valued at approximately $5.4 billion are underway. The Program EIR for the 2014 SUP was certified by the Board on November 10, 2015.

Measure RR was passed in 2020 to help address the significant and unfunded needs of Los Angeles public school facilities. Measure RR is a $7 billion bond measure aimed at continuing the funding for improvement of facilities and technology, upgrade of existing facilities, as well as increased safety measures amid the COVID-19 pandemic. On August 24, 2021, the Board updated the SUP to allocate the Measure RR funds, adjusted the

[1] Los Angeles Unified School District, Facilities Services Division. 2023. Strategic Execution Plan, p. 1.

categories and spending targets within the program, and approved the Measure RR Implementation Plan to help guide the identification of sites and development of project proposals. Accordingly, the 2015 SUP Program EIR has since been replaced by the 2023 Subsequent Program EIR (SPEIR) that was certified by the Board on December 12, 2023.[2]

The bond program is now focused on improving equity between newer and older schools so that every student has an equal opportunity for success. The updated SUP framework and the Measure RR Implementation Plan reflect the goals of and priorities for Measure RR, as outlined in the bond language approved by voters and the Proposed 2020 Bond Funding Priorities Package previously adopted by the Board. Moreover, they also reflect the input solicited earlier this year from Community of Schools Administrators and Local District leadership. The overarching goals and principals of the SUP, which will drive the development of future projects, are to upgrade, modernize, and replace aging and deteriorating District school facilities; update technology; and address District school facilities inequities to provide students with physically and environmentally safe, secure, and updated school facilities that support 21st-century learning.[3]

On October 12, 2021, the Board approved the project definition for site due diligence, planning and, feasibility activities for the proposed Project to identify and prioritize the improvements needed at the Campus. On November 15, 2022, the Board approved the redefinition of the proposed Project to provide facilities that are safe, secure, and better aligned with the current instructional program. The proposed Project is designed to address the most critical physical concerns of the building and grounds at the Campus while providing renovations, modernizations, and reconfiguration as needed.[4]

The proposed Project has been developed under the LAUSD's SUP to provide Measure RR funding to give every student access to safe, secure, and updated schools. Irving MS was identified as one of seven schools in the District most in need of an upgrade due to the physical condition of the facilities.[5] The primary objective of the proposed Project is to address the most critical physical conditions and essential safety of the site, which includes alleviating seismic and structural risks discovered on the Campus. The three buildings on the Assembly Bill (AB) 300 list (Administration Building, Auditorium, and Physical Education Building) have structural deficiencies. The Administration Building has insufficient seismic gaps, overstressed shear walls and diaphragm openings that are too large. The Auditorium has insufficient wall anchorage and diagonal sheathing at the diaphragm. The Physical Education Building was found to have overstressed shear walls and insufficient wall anchorage at the diaphragm.

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2 Los Angeles Unified School District. 2023. *Subsequent Program EIR for the School Upgrade Program*. http://achieve.lausd.net/ceqa

3 Based on: Los Angeles Unified School District, Facilities Services Division. August 24, 2021. Board of Education Report, Update to the School Upgrade Program to Integrate Measure RR Funding and Priorities.

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

5 Los Angeles Unified School District. November 15, 2022. Board of Education Report (File #: Rep-074-22/23). Approve the Redefinition of Five Major Modernization Projects at 49th Street Elementary School, Canoga Park High School, Garfield High School, Irving Middle School, and Sylmar Charter High School, and Amend the Facilities Services Division Strategic Execution Plan to Incorporate Therein.

A fault is a fracture or zone of fractures between two blocks of rock.[6] Faults allow the blocks to move relative to each other. This movement may occur rapidly, in the form of an earthquake, or may occur slowly, in the form of creep. As stated in the Initial Study (**Appendix 1**) and the Geotechnical Investigation Report (Appendix D to the Initial Study; hereafter **Appendix 1-D**), multiple known earthquake faults have been mapped beneath the Campus. The Hollywood Fault is estimated to be located in the southern corner of the Campus running west beneath the New Classroom Building and the Soccer Field; the Raymond Fault is estimated to be located in the north corner of the site running west beneath the Athletic Field; and a postulated fault is estimated to run west beneath the Homemaking Building, Classroom Building, Administration Building, and six bungalows. The Geotechnical Investigation mapped a postulated fault zone and 50-foot zone on either side of the fault zone to be excluded from new structure construction (see Figure 2, *Site Geologic Map*, in Appendix 1-D).

The Physical Education Building, while not located on the fault, is located within the 50-foot setback area where no new structure construction would occur under the proposed Project. The Administration Building is located within the fault zone. The Classroom Building, Homemaking Building, New Classroom Building, Shop Building #2, and all six bungalow classrooms are also located in the fault zone.

[6] U.S. Geological Survey (USGS). N.d. What Is a Fault and What Are The Different Types? https://www.usgs.gov/faqs/what-a-fault-and-what-are-different-types (accessed August 20, 2024).

2.3 Project Location

The approximately 11.2-acre Irving MS Campus is located at 3010 Estara Avenue (APNs 5458-019-900 [main parcel], 5458-018-903 [southwest of Moss Avenue], 5458-018-904, 5458-018-905, 5458-018-906, 5458-018-907, 5458-018-908, 5458-018-909, 5458-018-910, 5458-018-911, 5458-018-912, 5458-018-913, 5458-018-914, 5458-018-915, 5458-018-916, and 5458-018-917) in the community of Northeast Los Angeles (neighborhood of Glassell Park) within the City of Los Angeles (City) in Los Angeles County.[7] Within LAUSD, Irving MS is a part of Region West and the Board District 5. Regional access to the site is from State Route 2 by exiting on San Fernando Road, traveling northwest on San Fernando Road for approximately 0.2 miles, and then traveling northeast on Fletcher Drive for approximately 0.2 miles (see **Figure 2-1, *Project Vicinity***).

The Project site is bounded by Fletcher Drive to the northwest, Estara Avenue to the northeast, Marguerite Street to the southeast, West Avenue 32 to the southwest, and residential properties and neighborhood commercial properties in the western corner (see **Figure 2-2, *Project Location***). Additionally, Moss Avenue and Roswell Street are City-owned rights-of-way that run through the Campus and connect Fletcher Drive to Estara Avenue. The proposed Project does not involve any structural work on the City streets; therefore, the proposed Project site consists of 11.2 acres of the Campus, not including the City rights-of-way. Additionally, there may be some asphalt replacement and parking lot restriping occurring on these streets. Regionally, the Project site is approximately 0.01 miles north and approximately 0.1 miles west of State Route 2, approximately 1.5 miles east of I-5, and approximately 2.6 miles south of State Route 134.

The Campus is located on the U.S. Geological Survey (USGS) 7.5-minute series Los Angeles quadrangle, within a valley between the San Rafael Hills to the north (with elevations of 1,600+ feet above mean sea level [msl]), the hills of Mount Washington to the east (with elevations of 900+ feet above msl), Elysian Heights to the south (with elevations of 650+ feet above msl), and Griffith Park to the west (with elevations of 1,400+ feet above msl). The Project site is sloped downwards on all sides from the campus core towards the surrounding land uses, with the lowest point in the southernmost corner, and has an elevation that ranges from approximately 390–391 to 415–416 feet above msl.

[7] City of Los Angeles. N.d. ZIMAS. https://zimas.lacity.org/ (accessed August 22, 2023).

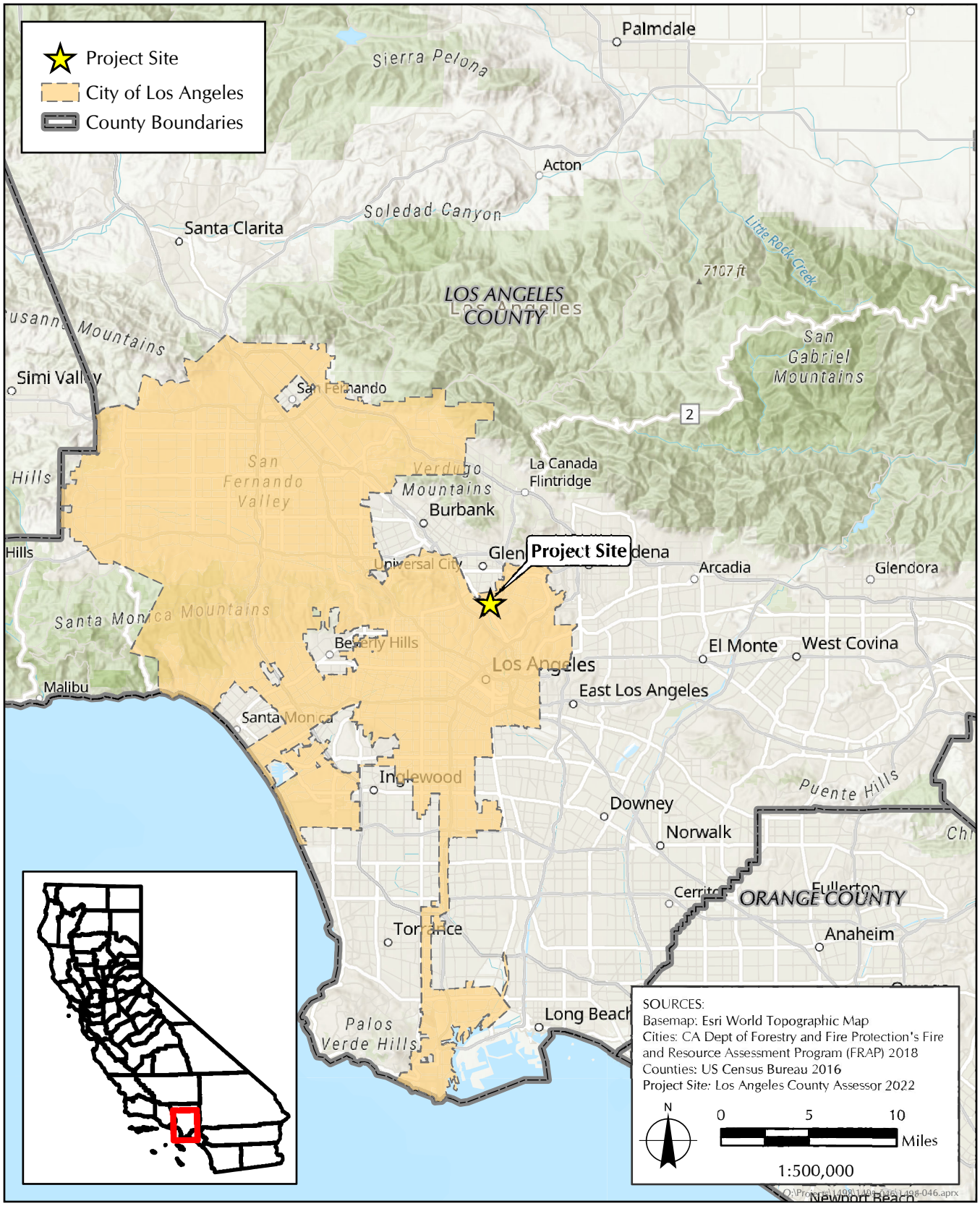


FIGURE 2-1

Project Location

FIGURE 2-2
Project Location

2.4 Existing Setting

2.4.1 Existing Land Use

The proposed Project site is an educational facility that primarily serves Grades 6 through 8 (middle school) through a STEAM[8] Magnet Program with approximately 815 students enrolled in the program (**Table 2-1, *2023–2024 Campus Enrollment***). However, the Campus hosts two additional specialized instructional programs in addition to the STEAM Magnet Program: Isana Octavia Charter (kindergarten [K] through 8th grade) and City of Angels Community School (K through 12th grade). In total, the Campus currently has an enrollment of approximately 1,100 students.[9]

TABLE 2-1
2023–2024 CAMPUS ENROLLMENT

School Program	Grades	Enrollment
Washington Irving Middle School Math, Music and Engineering Magnet[1]	6–8	815
ISANA Octavia Charter Academy[2]	3–8	375
City of Angels Community School[3]	K–12	~30

Source: [1] California Department of Education. N.d. School Profile: Washington Irving Middle School Math, Music and Engineering Magnet. https://www.cde.ca.gov/sdprofile/details.aspx?cds=19647336058077 (accessed November 2, 2023).

[2] California Department of Education. N.d. School Profile: ISANA Octavia Academy. https://www.cde.ca.gov/sdprofile/details.aspx?cds=19647330122655 (accessed November 2, 2023).

[3] Enrollment estimate based on one student classroom capacity.

Irving MS is an irregularly shaped campus split by two City streets on an approximately 11.2-acre parcel, with 11 permanent buildings comprising 56 standard classrooms and six portable buildings comprising 9 standard classrooms. The main entrance gate to the Campus is located on the northeastern side, along Estara Avenue between the Administration Building and the Auditorium. The Campus site is bisected by two main walking paths. The first main walking path runs east-west across Campus and connects an entrance on Marguerite Avenue to Moss Avenue. Both ends of this walking path serve as drop-off points for pedestrians. The second main walking path starts at the Main Pedestrian Gate entrance on Estara Avenue and runs southwest to the Physical Education Building. The buildings are oriented inwardly, away from the streetscape, to face walkways, parking lots, courtyards, and the playing field at the south end of the campus at the corner of West Avenue 32 and Marguerite Street. Another playing field at the corner of Fletcher Drive and Estara Avenue, paved recreation areas, and storage containers occupy the rectangular area formed by the former Moss Avenue and the former Roswell Street. The Campus contains a natural grass athletic field at the northern corner, adjacent to eight asphalt basketball courts near Fletcher Drive. At the southern end of Campus, an artificial turf soccer field surrounded by a track is located adjacent to seven additional asphalt basketball courts along Marguerite Street, with racquetball courts to the east of the soccer field, between the Physical Education Building and Marguerite Street. On-site parking can be accessed from the former/abandoned Roswell Street easement, which provides parking on both sides and Special Education (SPED) bus pick-up and drop-off in front of the

[8] Science, technology, engineering, art, and mathematics.

[9] California Department of Education. N.d. School Profile: Washington Irving Middle School Math, Music and Engineering Magnet. https://www.cde.ca.gov/sdprofile/details.aspx?cds=19647336058077 (accessed November 2, 2023).

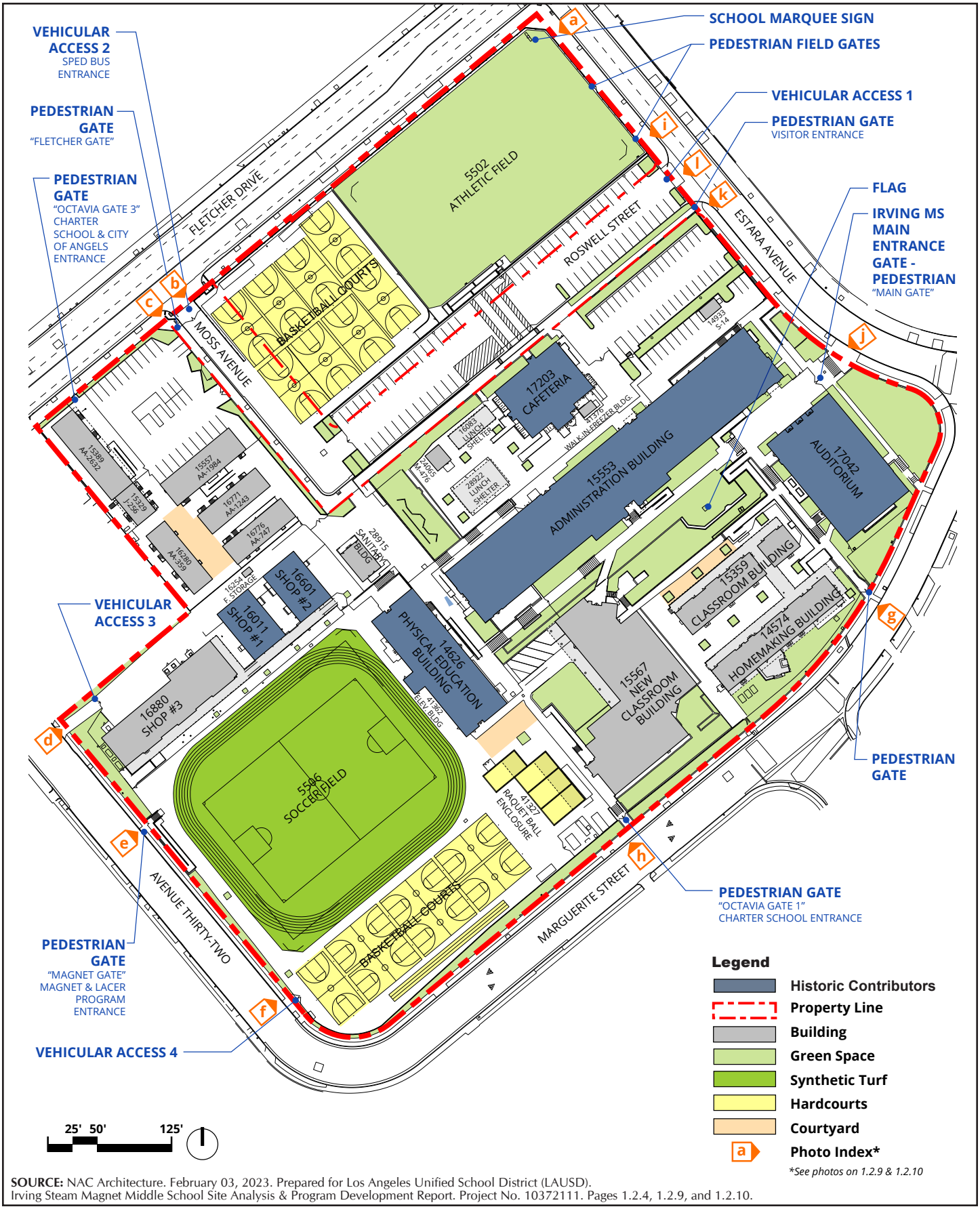
Cafeteria Building, as well as the former/abandoned Moss Avenue. There are five pick-up/drop-off zones located on campus. There is a Magnet and afterschool program pick-up/drop-off zone located on W Avenue 32, a Charter School pick-up/drop-off zone located on Marguerite Street with an entrance at Octavia Gate, an Irving MS pick-up/drop-off zone at the Pedestrian Gate on Marguerite Street, a City of Angels Community School pick-up/drop-off zone off Fletcher Drive, and an Irving MS pick-up/drop-off zone at the Main Gate entrance. **Table 2-2, *Characteristics of Existing Buildings***, provides a summary of all the buildings on the Campus. **Figure 2-3, *Existing Site Plan and Context Photos*,** shows the existing Campus site plan and buildings.

In addition to the four original campus buildings on the eastern half of Campus, there are several shops and classroom buildings within the west side of Campus. On the southeast side of Campus off Marguerite Street is a complex of newer classroom buildings, southeast of the Administration Building and between the Auditorium and the Physical Education Building.

The proposed Project site is located entirely within an Alquist Priolo Earthquake Fault Zone, with the Hollywood Fault and the Raymond Fault running beneath the Campus.[10] The Hollywood Fault is estimated to be located in the southern corner of the Campus running west beneath the New Classroom Building and the Soccer Field; the Raymond Fault is estimated to be located in the north corner of the site running west beneath the Athletic Field; and a postulated fault is estimated to run west beneath the Homemaking Building, Classroom Building, Administration Building, and bungalows. The proposed Project is being undertaken to alleviate existing structural and seismic deficiencies in Campus buildings and to address the risks associated with the postulated fault. In addition to potential for fault rupture, three buildings on Campus (Administration Building, Auditorium, and Physical Education Building) have been found to have structural deficiencies.[11] The Administration Building has insufficient seismic gaps, overstressed shear walls, and diaphragm openings that are too large. The Auditorium has insufficient wall anchorage and diagonal sheathing at the diaphragm. The Physical Education Building has overstressed shear walls and insufficient wall anchorage at the diaphragm. The buildings' existing structural deficiencies currently pose greater risks of loss, injury, or death than other buildings if fault rupture were to occur. The proposed Project would replace the removed Administration Building, Homemaking Building, a permanent classroom building, and multiple portable buildings with new construction at least 50 feet away from the known fault.

[10] California Department of Conservation, California Geological Survey. N.d. Earthquake Zones of Required Investigation https://maps.conservation.ca.gov/cgs/EQZApp/app/ (accessed August 17, 2023)

[11] NAC Architecture for Los Angeles Unified School District. February 3, 2023. Irving Steam Magnet Middle School Site Analysis and Development Report.



SOURCE: NAC Architecture. February 03, 2023. Prepared for Los Angeles Unified School District (LAUSD). Irving Steam Magnet Middle School Site Analysis & Program Development Report. Project No. 10372111. Pages 1.2.4, 1.2.9, and 1.2.10.

FIGURE 2-3
Existing Site Plan and Context Photos

a: View of athletic field at corner of Fletcher Drive and Estara Ave. Looking south.

b: Gate at Moss Ave off of Fletcher drive. Looking southeast. (Vehicular Access 2)

c: Pedestrian gate off of Fletcher Drive. Looking southeast. (Octavia Gate 3 - Pedestrian)

d: View of the Shop Buildings from 32 Ave. Looking northeast. (Vehicular Access 3)

e: Gate south of the soccer field of off 32 Ave. (Magnet Gate - Pedestrian)

f: Gate on 32 Ave. by basketball courts at south end of the campus. (Vehicular Access 4)

SOURCE: NAC Architecture. February 03, 2023. Prepared for Los Angeles Unified School District (LAUSD).
Irving Steam Magnet Middle School Site Analysis & Program Development Report. Project No. 10372111. Pages 1.2.4, 1.2.9, and 1.2.10.

FIGURE 2-3
Existing Site Plan and Context Photos

g: Pedestrian gate on Marguerite St between the Homemaking and Auditorium Buildings.

h: View of Charter school entrance from Marguerite St, Looking northwest. (Octavia Gate 1 - Pedestrian)

i: Pedestrian gates on Estara Ave. for Athletic Field access.

j: Original main entrance of off Estara Ave. Admin bldg is in the background. (Main Gate - Pedestrian)

k: View of main pedestrian gate from Estara Ave. Looking southwest.

l: View of parking entrance gate of off Estara Ave. Looking southwest. (Vehicular Access 1)

SOURCE: NAC Architecture. February 03, 2023. Prepared for Los Angeles Unified School District (LAUSD).
Irving Steam Magnet Middle School Site Analysis & Program Development Report. Project No. 10372111. Pages 1.2.4, 1.2.9, and 1.2.10.

FIGURE 2-3
Existing Site Plan and Context Photos

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TABLE 2-2
CHARACTERISTICS OF EXISTING BUILDINGS

Building ID	Building DSA Number	Building Name	Year Built	Building Square Footage	Stories	Building Type	Historic Contributor	Assembly Bill (AB) 300[1]
Buildings to be Demolished/Removed								
15553	1710	Administration Building	1937	53,949	2+B	Permanent	Contributor	Yes – insufficient seismic gaps, overstressed shear walls, and diaphragm openings that are too large
14574	12798	Homemaking Building	1956	4,432	1	Permanent		No
15359	12798	Classroom Building	1956	4,061	1	Permanent		No
Portable Buildings to Be Removed								
16280	5039	AA-359 Relocatable Building (Bungalow)	1947	1,852	1	Portable		No
16776	7277	AA-747 Relocatable Building (Bungalow)	1949	1,912	1	Portable		No
16771	10419	AA-1243 Relocatable Building (Bungalow)	1953	1,922	1	Portable		No
15329	16338	J-256 Relocatable Building (Sanitary)	1957	902	1	Portable		No
15557	18474	AA-1984 Relocatable Building (Bungalow)	1959	2,555	1	Portable		No
15389	32479	AA-2632 Relocatable Building (Bungalow)	1970	2,774	1	Portable		No
14933	No DSA	S-14 (Service)	1973	255	1	Portable		No
Permanent Building for Seismic Retrofit								
17042	1699	Auditorium	1939	14,957	1+B+M	Permanent	Contributor	Yes – insufficient wall anchorage and diagonal sheathing at the diaphragm
Buildings to Remain								
14626	1711	Physical Education Building	1937	15,776	2	Permanent	Contributor	Yes – overstressed shear walls and insufficient wall anchorage at the diaphragm
16011	1938	Shop No. 1	1937	3,000	1+M	Permanent	Contributor	No
16601	1939	Shop No. 2	1937	2,999	1+M	Permanent	Contributor	No
17203	1937	Cafeteria	1938	5,231	1	Permanent	Contributor	No
24065	No DSA	M-476 (Storage)	1939	381	1	Portable		No
16254	No DSA	Flammable Storage	1953	45	1	Permanent		No
16880	12798	Shop No. 3	1955	6,541	1	Permanent		Yes – building has been updated
15567	48818	New Classroom Building	1990	29,084	2	Permanent		No
41362	64389	Elevator Building	2001	413	2	Permanent		No
28915	03-104998	Sanitary Building	2004	864	1	Permanent		No
41376	No DSA	Walk-in Freezer	Unknown	151	n/a	Portable		No

Source: [1] State of California. April 5, 1999. AB 300. http://www.leginfo.ca.gov/pub/99-00/bill/asm/ab_0251-0300/ab_300_bill_19991010_chaptered.html

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The buildings on the Campus range in condition from good to critical.[12] Most of the buildings are in poor condition. The Homemaking Building, Cafeteria, New Classroom Building, and Shop Building #2 are all in critical condition, with HVAC and Fire Protection being the primary concerns cited in the Facilities Condition Index as well as by the site observation team. Assembly Bill (AB) 300, enacted in 1999, required the State of California Department of General Services (DGS) to survey the State's public school buildings (grades K–12) for earthquake safety and to submit a report of its findings to the Legislature.[13] In addition, AB 300 was amended in 2001 adding Section 17317, required the DGS to be in consultation with the Seismic Commission for conducting an inventory of public school buildings that did not meet the minimum requirements of the 1976 Uniform Building Code.[14] Since 2006, 667 of LAUSD's buildings have been identified for seismic evaluation based upon AB 300 criteria and LAUSD's higher standards. Since that time, seismic evaluations have been performed on school buildings identified to be the most seismically vulnerable, and projects have been developed to address the buildings determined to be in the greatest need of structural upgrades. The three buildings on the AB 300 list (Administration Building, Auditorium, and Physical Education Building) have all been found to have structural deficiencies. The Administration Building has insufficient seismic gaps, overstressed shear walls and diaphragm openings that are too large. The Auditorium has insufficient wall anchorage and diagonal sheathing at the diaphragm. The Physical Education Building was found in the Site Analysis and Development Report to have overstressed shear walls and insufficient wall anchorage at the diaphragm. The Administration Building is located in a fault zone. The Classroom Building, Homemaking Building, New Classroom Building, and Shop Building #2 are located on the fault. The Physical Education Building is located outside the postulated fault zone, within the 50-foot setback area. All six bungalow classrooms are either located on the fault or within the 50-foot setback area.

The site topography has 20 feet of grade change across the campus. It slopes from south to north with the lowest point in the southernmost corner. The highest point is in the middle of the Campus at the Administration Building and Cafeteria. There are multiple terraces, stairs, and ramps to mitigate these grade differences. Some of these ramps are accessibility upgrades that have been made over the years and contribute to the disconnected nature of the exterior spaces.

[12] NAC Architecture for Los Angeles Unified School District. February 3, 2023. Irving Steam Magnet Middle School Site Analysis and Development Report.

[13] Los Angeles Unified School District. N.d. Seismic Safety of School Buildings. https://www.lausd.org/Page/18943 (accessed November 2, 2023).

[14] California Legislative Information. N.d. Article 3, Section 17317. https://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?lawCode=EDC&sectionNum=17317 (accessed July 11, 2024).

The Project site is designated by the City General Plan and the Northeast Community Plan as "Junior High School – Public" with a "Public Facilities" land use designation (see **Figure 2-4, *General Plan Land Use Designation Map***),[15] and it is zoned "Public Facilities" (PF) (see **Figure 2-5, *Zoning Designation Map***).[16] Both the Northeast Los Angeles Community Plan and the City zoning code permit public secondary schools in the Public Facilities designations.[17,18] Public Facilities is the designation for the use and development of publicly owned land in order to implement the City's adopted General Plan, including, the circulation and service systems designations in the City's adopted district and community plans, and other relevant General Plan elements, including the circulation, public recreation and service systems elements.[19] Under the proposed Project, the use of the land falls under public secondary schools, which is allowed by the PF (public facility) zoning designation. As allowed per Government Code Section 53094, in 2019 the LAUSD Board of Education adopted a resolution to exempt all LAUSD school sites from local land use regulations.[20] LAUSD anticipates that it would comply with Government Code Section 53094 to render the local City of Los Angeles Zoning Ordinance inapplicable to the proposed Project.

[15] City of Los Angeles. June 25, 2014. General Plan Land Use Map – Northeast Los Angeles Community Plan. https://planning.lacity.org/plans-policies/community-plan-area/north-los-angeles

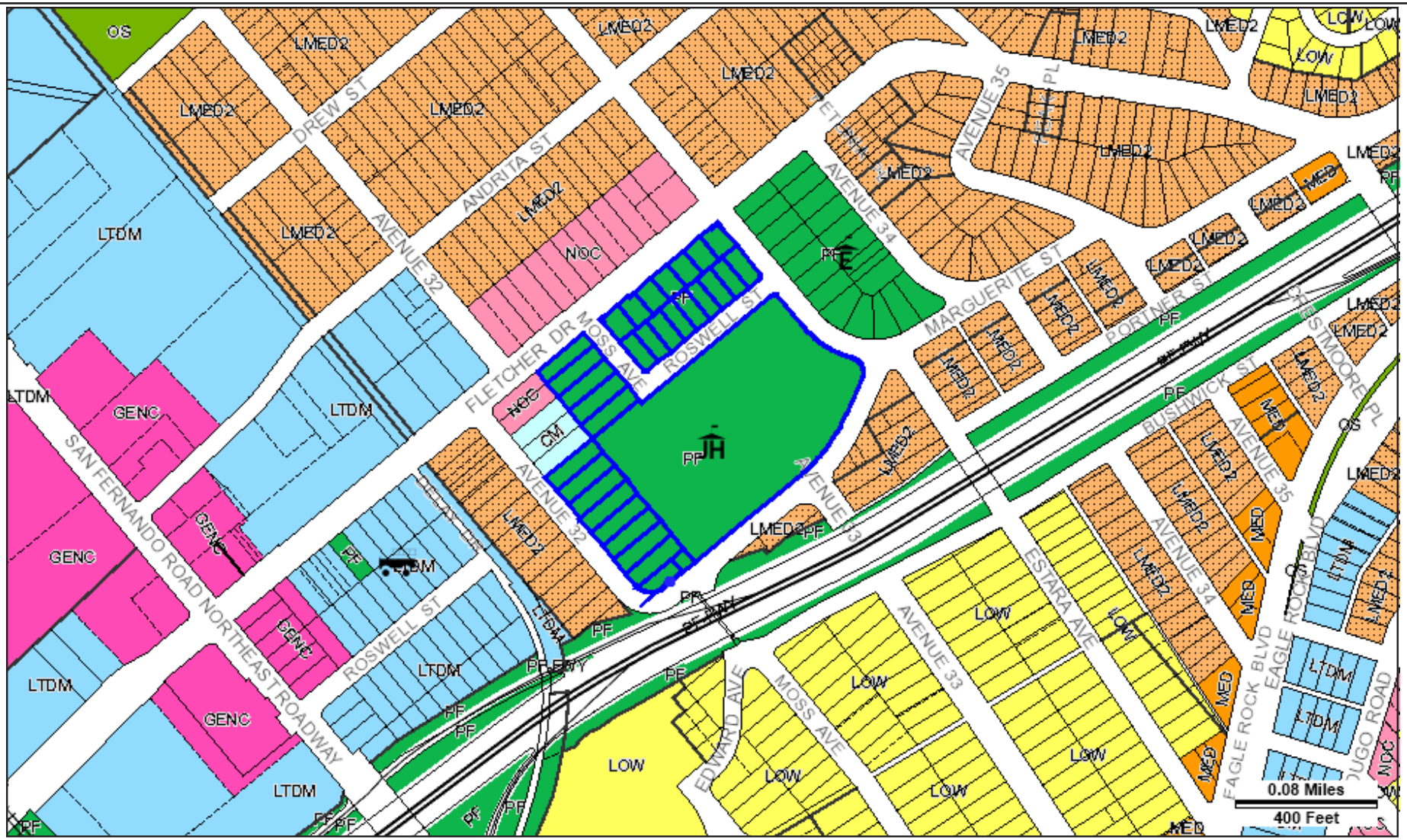
[16] City Zone Information and Map Access System (ZIMAS). N.d. http://zimas.lacity.org/. (accessed August 29, 2023).

[17] City of Los Angeles. September 7, 2016. Northeast Los Angeles Community Plan. https://planning.lacity.org/plans-policies/community-plan-area/north-los-angeles

[18] City of Los Angeles. N.d. Municipal Code, Chapter 1, Section 12.04.09 "PF" Public Facilities Zone. https://codelibrary.amlegal.com/codes/los_angeles/latest/lapz/0-0-0-1548 (accessed April 23, 2023)

[19] American Legal Publishing. June 30, 1991. Los Angeles Municipal Code. Section 12.04.09. "PF" Public Facilities Zone. https://codelibrary.amlegal.com/codes/los_angeles/latest/lapz/0-0-0-1548 (accessed August 29, 2023)

[20] Los Angeles Unified School District. 2019. Board of Education Report. 18/19 ed. Vol. 256.



Address: undefined
APN: 5458019900
PIN #: 153A213 42

Tract: TR 575
Block: None
Lot: FR 116
Arb: None

Zoning: PF-1-CDO
General Plan: Public Facilities

SOURCE: City of Los Angeles. July 11, 2023. ZIMAS. General Plan Land Use Background Map Display Layer. Available at: https://zimas.lacity.org/

FIGURE 2-4
General Plan Land Use Designation Map

LEGEND

GENERALIZED ZONING

- OS, GW
- A, RA
- RE, RS, R1, RU, RZ, RW1
- R2, RD, RMP, RW2, R3, RAS, R4, R5, PVSP
- CR, C1, C1.5, C2, C4, C5, CW, WC, ADP, LASED, CEC, USC, PPSP, MU, NMU
- CM, MR, CCS, UV, UI, UC, M1, M2, LAX, M3, SL, HJ, HR, NI
- P, PB
- PF

GENERAL PLAN LAND USE

LAND USE

RESIDENTIAL

- Minimum Residential
- Very Low / Very Low I Residential
- Very Low II Residential
- Low / Low I Residential
- Low II Residential
- Low Medium / Low Medium I Residential
- Low Medium II Residential
- Medium Residential
- High Medium Residential
- High Density Residential
- Very High Medium Residential

COMMERCIAL

- Limited Commercial
- Limited Commercial - Mixed Medium Residential
- Highway Oriented Commercial
- Highway Oriented and Limited Commercial
- Highway Oriented Commercial - Mixed Medium Residential
- Neighborhood Office Commercial
- Community Commercial
- Community Commercial -Mixed High Residential
- Regional Center Commercial

INDUSTRIAL

- Commercial Manufacturing
- Limited Manufacturing
- Light Manufacturing
- Heavy Manufacturing
- Hybrid Industrial

PARKING

- Parking Buffer

PORT OF LOS ANGELES

- General / Bulk Cargo - Non Hazardous (Industrial / Commercial)
- General / Bulk Cargo - Hazard
- Commercial Fishing
- Recreation and Commercial
- Intermodal Container Transfer Facility Site

LOS ANGELES INTERNATIONAL AIRPORT

- Airport Landside / Airport Landside Support
- Airport Airside
- LAX Airport Northside

OPEN SPACE / PUBLIC FACILITIES

- Open Space
- Public / Open Space
- Public / Quasi-Public Open Space
- Other Public Open Space
- Public Facilities

INDUSTRIAL

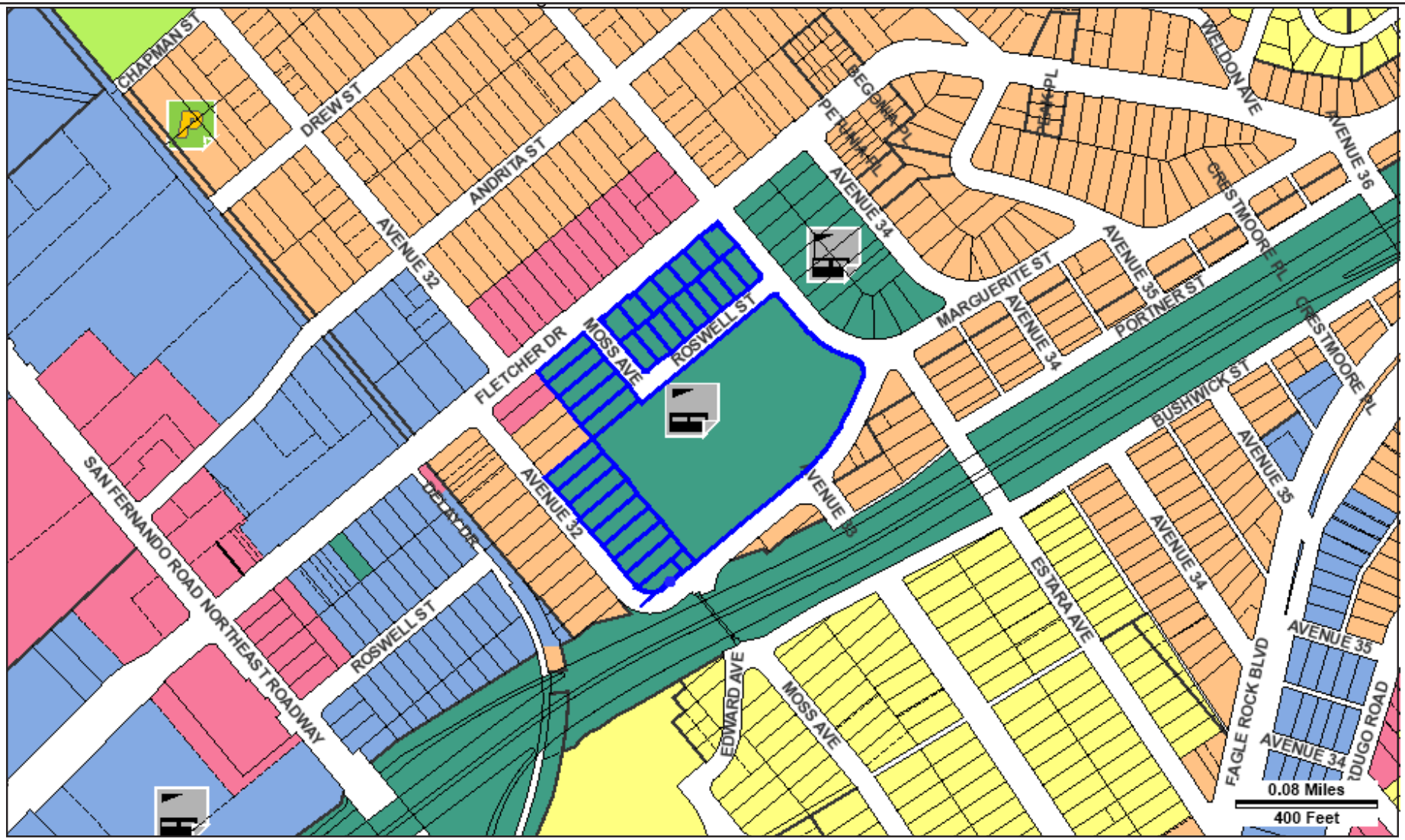
- Limited Industrial
- Light Industrial

FRAMEWORK

COMMERCIAL

- Neighborhood Commercial
- General Commercial
- Community Commercial
- Regional Mixed Commercial

FIGURE 2-4
General Plan Land Use Designation Map



Address: undefined
APN: 5458019900
PIN #: 153A213 42

Tract: TR 575
Block: None
Lot: FR 116
Arb: None

Zoning: PF-1-CDO
General Plan: Public Facilities

SOURCE: City of Los Angeles. July 11, 2023. ZIMAS. Generalized Zoning Background Map Display Layer. Available at: https://zimas.lacity.org/

FIGURE 2-5
Zoning Designation Map

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2.4.2 Campus History

Irving MS has been in operation as a school since 1937.[21] The site was undeveloped land in the late 1800s and was primarily developed with residences and associated structures through the 1900s (see **Appendix 1-A, *Phase I Environmental Site Assessment [ESA]***). The Project site was originally the location where Andrew Glassell built his "Ranch House" in 1889 on the land he purchased from the 36,403-acre Rancho San Rafael tract.[22, 23] Andrew Glassell (1827–1901) was an American real estate attorney and investor from Virginia who was named the first president of the Los Angeles Bar Association. After his death, the Glassell family began selling some of the property, leading to subdivisions in the community that is now called Glassell Park. The land was originally surrounded by citrus orchards and walnut groves. The orchards and groves along with the surrounding areas would eventually be transformed into residential tract made up of individually designed bungalow residences. By the 1930s, two streets and commercial properties were added, and portions of the existing school were developed on the northern portion in 1936 and 1937. In 1936, the City purchased Glassell's ranch house through eminent domain to establish Irving MS, which included the following buildings: Administration Building (1937); Auditorium (1939); Physical Education Building (1937); Cafeteria (1938); and two-unit shops that were constructed between 1936 and 1939 (see Table 2-2).[24] The Irving MS campus core was constructed from 1936 to 1939 in the architectural era of Public Works Administration (PWA) Moderne.[25] In the 1930s, PWA funding helped buoy school construction during the Great Depression.[26] According to the Historic Resource Evaluation Report (HRER) for the Project site, the Administration Building, Auditorium, and the Physical Education Building were designed by Edwin L. Bergstrom and the Cafeteria along with the two-unit shops were designed by Alfred S. Nibecker, Jr. (see **Appendix 1-B, *Historic Resource Evaluation Report***). The buildings by Bergstrom "exhibit character-defining features associated with PWA Moderne architecture, with elements of Streamline Moderne style."[27] In the 1940s and again in the 1980s, the school expanded by taking over adjacent residential properties. A third Shop Building was built in 1955, the one-story Classroom and Homemaking Buildings were built in 1956, six bungalow classrooms were added to the campus from 1947 to 1970, the two-story Classroom Building was built in 1990, and the Sanitary Building was built in 2004.[28] Additional structures have been developed onsite, and the existing structures and configuration of the site have been present since 2004. Today, the Project site continues to be surrounded predominantly by multi-

[21] California Department of Education. August 17, 2023. California School Directory - Washington Irving Middle School Math, Music and Engineering Magnet. https://www.cde.ca.gov/schooldirectory/details?cdscode=19647336058077

[22] ASM Affiliates, Inc. 2022. Historic Resource Evaluation Report: Irving Middle School. Prepared for Los Angeles Unified School District, Office of Environmental Health & Safety.

[23] U.S. Department of the Interior, National Park Service. April 13, 2007. National Register of Historic Places Continuation Sheet. Glassell Park Elementary School. https://npgallery.nps.gov/GetAsset/aadbdf39-2ca0-4a3f-9f77-2c367a27f5b6/

[24] ASM Affiliates, Inc. 2022. Historic Resource Evaluation Report: Irving Middle School. Prepared for Los Angeles Unified School District, Office of Environmental Health & Safety.

[25] ASM Affiliates, Inc. 2022. Historic Resource Evaluation Report: Irving Middle School. Prepared for Los Angeles Unified School District, Office of Environmental Health & Safety.

[26] Sapphos Environmental, Inc. 2014. Los Angeles Unified School District Historic Context Statement, 1870 to 1969. Prepared for Los Angeles Unified School District, Office of Environmental Health and Safety.

[27] ASM Affiliates, Inc. 2022. Historic Resource Evaluation Report: Irving Middle School. Prepared for Los Angeles Unified School District, Office of Environmental Health & Safety.

[28] NAC Architecture for Los Angeles Unified School District. February 3, 2023. Irving Steam Magnet Middle School Site Analysis and Development Report.

family residential with some single-family residential, commercial, industrial, and public facilities (see Figure 2-3).

2.4.3 Surrounding Land Uses

Land uses surrounding the Project site are composed of public facilities, single- and multi-family residential, neighborhood commercial, commercial manufacturing, and limited manufacturing uses (see **Figure 2-6, *Surrounding Land Use***). Fletcher Drive Elementary School is located across Estara Avenue to the northeast, residential uses are located immediately west and across Marguerite Street and Avenue 32 to the southeast and southwest, State Route 2 is located across Marguerite Street to the south, and commercial and manufacturing uses are located immediately west (Furniture Fosters and The Stash on York) and across Fletcher Drive to the northwest (The Crème Shop, Mendez Tax Services, Love Your Hair, Julie's Market, Viet on Fletcher, Birds Auto Detail and Ceramic Coatings, R B Signs, Zumba, Fresh Pup Cuts, Los Angeles World Embroidery & School Uniforms, Olivares flower and party shop, and El Ranchito Meat Market).

FIGURE 2-6

Surrounding Land Use

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2.5 Project Objectives

State CEQA Guidelines Section 15124 requires an EIR to include a statement of objectives sought by the proposed project. Four objectives have been established for the SUP and will aid decision makers in their review of the Project and associated environmental impacts:

1. Repair aging schools and improve student safety.
2. Upgrade schools to modern technology and educational needs.
3. Create capacity to attract, retain, and graduate more students through a comprehensive portfolio of small, high-quality pre-K through adult schools.
4. Promote healthier environment through green technology.

Furthermore, the District has established six core principles/objectives for the scoping of major modernization projects. The core principles of major modernization project scoping are as follows:[29]

1. Buildings meeting AB 300 criteria for seismic evaluation may be addressed, to the extent feasible, with a focus on those determined to have a high seismic vulnerability, through retrofit, removal, or seismic modernization, which will be determined based on an assessment of the seismic vulnerability of the building(s), the historic context of the building/site, actual or potential impact to the learning environment, site layout, and the approach that best ensures compliance with Division of the State Architect (DSA) requirements.
2. The buildings, grounds, and site infrastructure that have significant/severe physical conditions that already do or are highly likely in the near future to pose a health and safety risk, or negatively impact a school's ability to deliver the instructional program and/or operate may be addressed by repair or replacement.
3. The District reliance on relocatable buildings, especially for K–12 instruction, should be reduced.
4. Necessary and prioritized upgrades must be made throughout the school site in order to comply with the program accessibility requirements of the Americans with Disabilities Act (ADA) Title II Regulations, and the District's Self-Evaluation and Transition Plan under Title II of the ADA.
5. The exterior conditions of the school site will be enhanced around new buildings and/or areas impacted by construction to improve the visual appearance including landscape and hardscape.
6. Outdoor learning environments will be developed where the site layout and project planning provide the opportunity.

[29] Los Angeles Unified School District. November 15, 2022. Board of Education Report (File #: Rep-074-22/23). Approve the Redefinition of Five Major Modernization Projects at 49th Street Elementary School, Canoga Park High School, Garfield High School, Irving Middle School, and Sylmar Charter High School, and Amend the Facilities Services Division Strategic Execution Plan to Incorporate Therein.

The proposed Project would substantially modernize the Irving MS campus. The Project would be completed under LAUSD's SUP. As such, the goals of the Project are consistent with the SUP's goal to build, modernize, and repair school facilities to improve student health, safety, and educational quality.[30]

2.6 Project Characteristics

The proposed Project involves building replacement and reconfiguration on the Irving MS Campus as part of the update to the SUP. The scope consists of the modernization of the Campus to facilitate a safe and secure campus that is better aligned with the current instructional program and meets current DSA requirements and educational specifications. Structurally vulnerable buildings located on an identified earthquake fault would be demolished and replaced by a new building that will improve educational quality and safety for students and staff. The proposed Project also includes essential upgrades, including seismic retrofit of the Auditorium Building outside of the earthquake fault, the removal of barriers and other accessibility upgrades, and various landscape and hardscape improvements.

The proposed Project would result in demolition and/or modifications to existing buildings, including historic buildings and resources. However, the Project would be designed to preserve and/or enhance character-defining features associated with the Campus, while avoiding the earthquake fault. Additionally, the proposed Project would be designed and implemented in a manner that complies with the LAUSD Design Guidelines and Treatment Approaches for Historic Schools.[31]

Upon completion of Project construction, the Project would reduce the total number of standard classrooms on the Campus from 65 to 46 to accommodate the long-term needs of the school and community, while providing additional outdoor learning and gathering spaces for its students. The proposed Project would include the changes to the Campus buildings shown in **Table 2-3, *Proposed Project (Demolition, Removal, and Construction)***, **Figure 2-7, *Demolition Plan*,** and **Figure 2-8, *Proposed Project Site Plan***.

[30] Los Angeles Unified School District. 2023. *Subsequent Program EIR for the School Upgrade Program*. http://achieve.lausd.net/ceqa

[31] SWCA Environmental Consultants. January 2015. Los Angeles Unified School District Design Guidelines and Treatment Approaches for Historic Schools. https://www.lausd.org/cms/lib/CA01000043/Centricity/domain/135/pdf%20files/Final_Design_Guidelines.pdf

TABLE 2-3
PROPOSED PROJECT (DEMOLITION, REMOVAL, AND CONSTRUCTION)

Bldg. ID.	Building	Building Type	Demolition	Removal	New Construction	Seismic Retrofit	Existing to Remain
14574	Homemaking Building	Permanent	4,432 sf				
14626	Physical Education Building	Permanent					15,776 sf (improvements need to be addressed in a future project)
14933	S-14	Portable - Service		255 sf			
15329	J-256 Relocatable Building	Portable - Sanitary		902 sf			
15359	Classroom Building	Permanent	4,061 sf				
15389	AA-2632 Relocatable Building	Portable - Bungalow		2,774 sf			
15553	Administration Building	Permanent	53,949 sf				
15557	AA-1984 Relocatable Building	Portable - Bungalow		2,555 sf			
15567	New Classroom Building	Permanent					29,084 sf
16011	Shop #1	Permanent					3,000 sf
16254	Flammable Storage	Permanent					45 sf
16280	AA-359 Relocatable Building	Portable - Bungalow		1,852 sf			
16601	Shop #2	Permanent					2,999 sf
16771	AA-1243 Relocatable Building	Portable - Bungalow		1,922 sf			
16776	AA-747 Relocatable Building	Portable - Bungalow		1,912 sf			
16880	Shop #3	Permanent					6,541 sf
17042	Auditorium	Permanent				14,957 sf	
17203	Cafeteria	Permanent					5,231 sf
24065	M-476	Portable - Storage					381 sf
28915	Sanitary Building	Permanent					864 sf
41362	Elevator Building	Permanent					413 sf
41376	Walk-in Freezer	Portable enclosure					151 sf
New Building Construction							
	(New) Administration and Classroom Building	Permanent			56,000 sf		
	Maintenance &Operations Building	Permanent			2,500 sf		
	Modular Classroom Building (for City of Angels)	Permanent			3,500 sf		
	Campus Total* (does not include outdoor space)		62,442 sf	12,172 sf	62,000 sf	14,957 sf	64,485 sf

Note: All numbers are in square feet (sf). All new square footages are approximate and subject to change during final site and architectural planning and design phases. These square footage changes would not significantly change the environmental analysis or findings in this IS. This table provides square footage for changes to existing and proposed buildings and portable structures; it does not include 4,211 square feet in demolition of arcades.

* Square footage totals may not add up exactly due to rounding and the way usable space is calculated. All numbers are based on *LAUSD Irving Middle School Preliminary Draft Space Program*, June 21, 2023, and *Test Fit 3A in LAUSD Irving Steam Magnet Middle School Site Analysis and Program Development Report (Site Analysis)*, February 3, 2023.

Current total square footage = 154,056. After Project square footage = 141,442. Decrease in campus square footage = 12,614.

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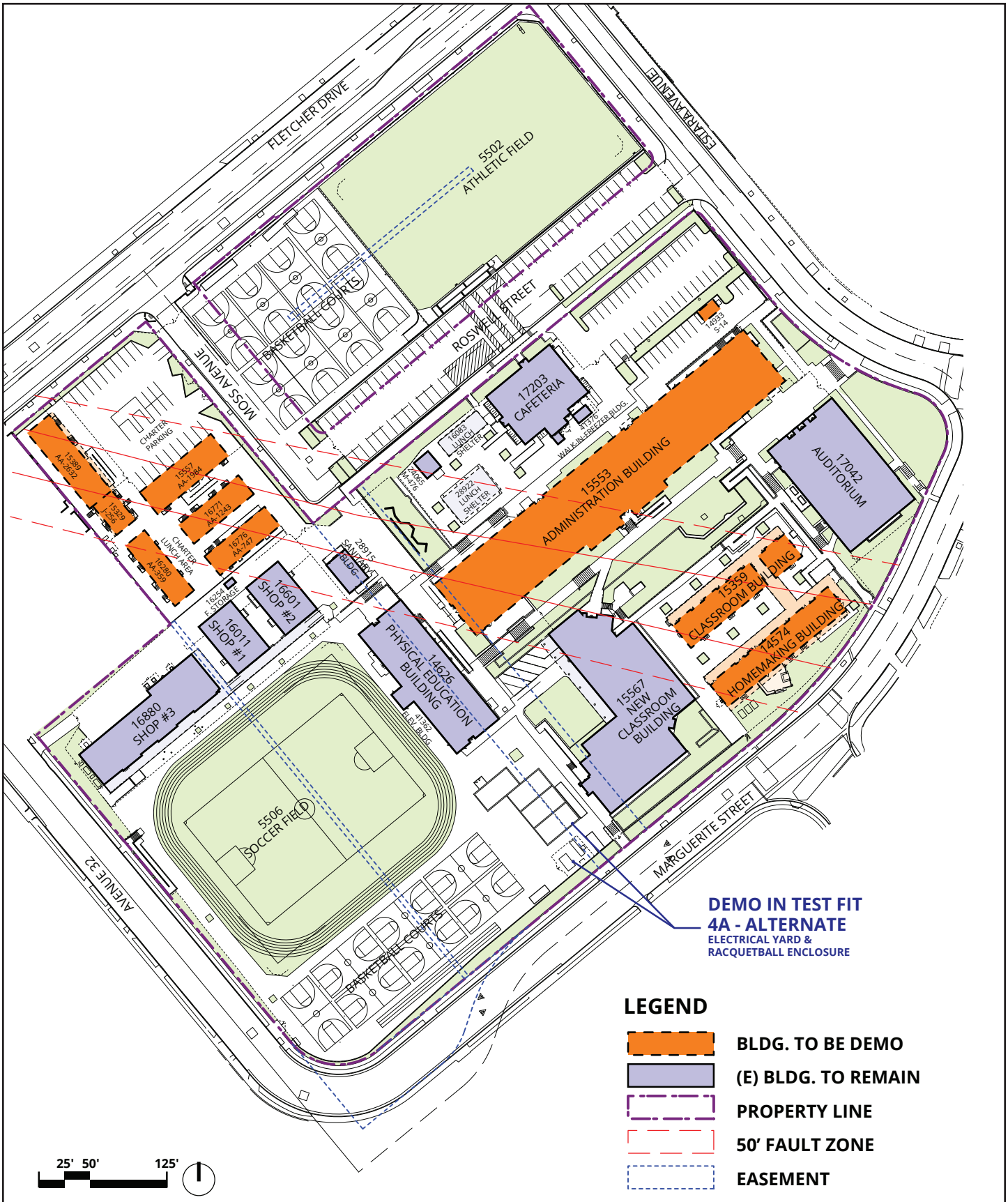

SOURCE: NAC Architecture. February 03, 2023. Prepared for Los Angeles Unified School District (LAUSD). Irving Steam Magnet Middle School Site Analysis & Program Development Report. Project No. 10372111. Page 5.1.2.

FIGURE 2-7
Demolition Plan

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Irving MS Project – Project Scope and Budget

Proyecto en Irving MS – Componentes y presupuesto del proyecto

New Construction

- (~19) Classrooms and Support Spaces
- Administration
- Library
- Maintenance & Operations
- (2) Classrooms for City of Angels District Program

Construcción Nueva

- *~19 Aulas y espacios de apoyo*
- *Administración*
- *Biblioteca*
- *Mantenimiento y Operaciones*
- *(2) Aulas para el Programa del Distrito de la Ciudad de Ángeles*

Seismic Retrofit

- Auditorium

Reforzamiento sísmico

- *Auditorio*

Site Work

- Site Infrastructure (as required)
- Landscape Improvements
- Parking
- Interim Facilities (as required)

Trabajo en el sitio

- *Infraestructura del sitio (según sea necesario)*
- *Mejoras de jardinería*
- *Estacionamiento*
- *Instalaciones provisionales (según sea necesario)*

Project Budget

- $139.9 million

Presupuesto

- *$139.9 millones*

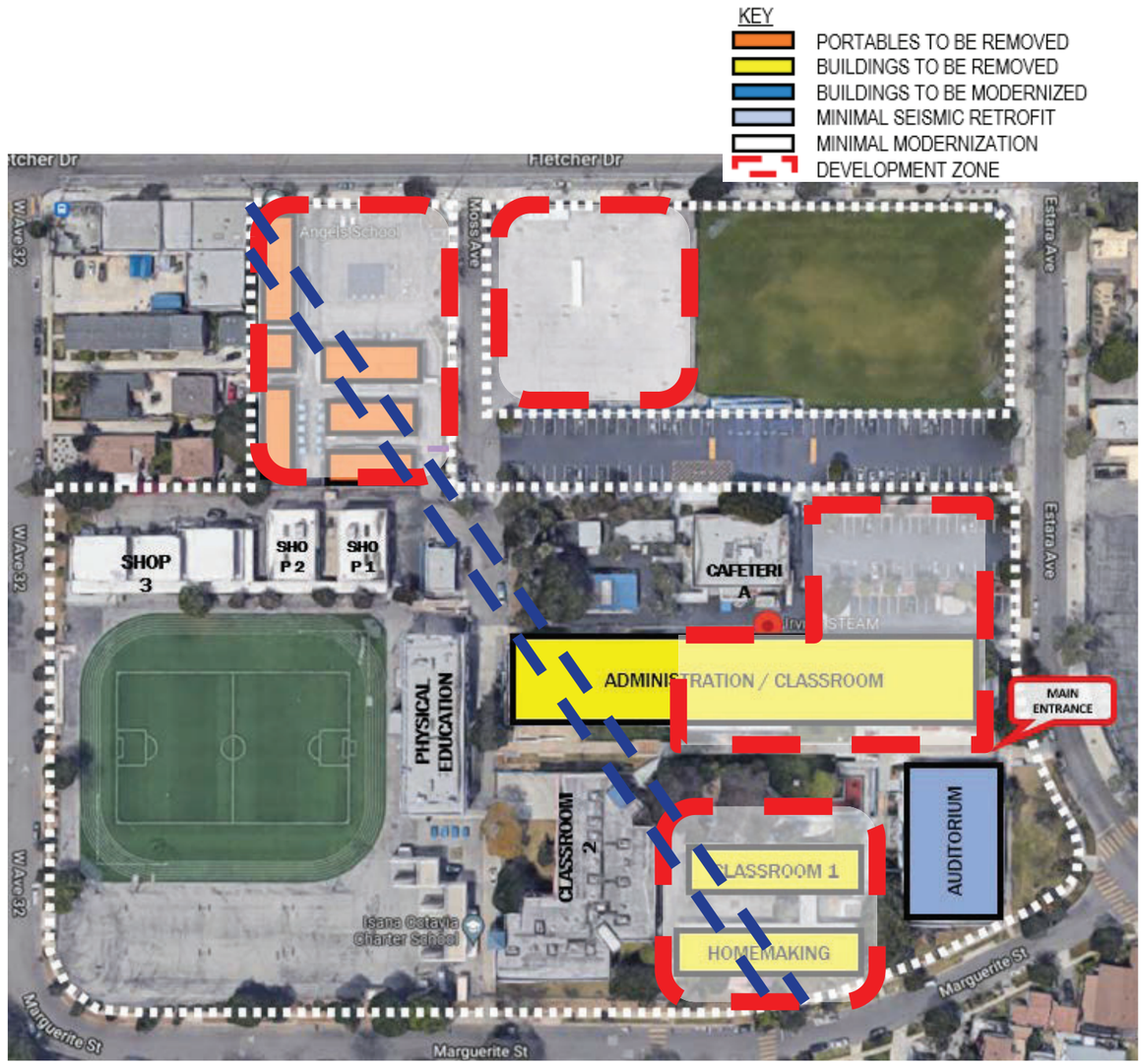

FIGURE 2-8
Proposed Project Site Plan

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2.6.1 Demolition and Removal

As shown in Figure 2-7, the proposed Project includes the demolition of the three permanent classroom buildings located directly over the known earthquake fault (Homemaking Building, Classroom Building, and Administration Building). Additionally, the proposed Project includes the removal of six relocatable buildings in the northwest corner of the site due to their location over the fault and as part of the District's goal of eliminating portable classroom facilities on campus. The proposed Project would also remove one accessory service structure. Total demolition is estimated at approximately 62,442 square feet. Total removal is estimated at approximately 12,172 square feet.

2.6.2 New Construction

The three permanent buildings, six relocatable buildings, and one accessory service structure planned to be demolished/removed would be replaced by one, approximately 56,000-square-foot, two-story building that would house 19 classrooms and support spaces, administration offices, library, and other building service spaces (see Figure 2-8). Additionally, the proposed Project would include construction of a Maintenance and Operation (M&O) Building and a modular building accommodating two classrooms and support spaces to be used by the City of Angels Community School to the north of the fault and vacated Moss Avenue cul-de-sac. All new structures would be located a minimum of 50 feet away from the fault, as required by state regulations. Total new construction is estimated at approximately 62,000 square feet.

2.6.3 Building Upgrades

In addition to the demolition of existing buildings and construction of new buildings, the proposed Project includes seismic and structural retrofitting for the Auditorium and a Campus-wide fire alarm upgrade.

The proposed Project also provides for ADA upgrades and accessibility as noted in the LAUSD Self-Evaluation and Transition Plan (SET Plan).[32] The SET Plan notes that programs, benefits, services, and activities provided by public entities must be made accessible to people with disabilities which are key requirements of both the ADA and Section 504, of the Rehabilitation Act of 1973. In addition, the SET Plan identifies three (3) levels, identified as categories, of access applied to schools:

- **Category 1:** "Key" schools including general access that are in accordance with applicable accessibility standards;
- **Category 2:** "Program-Accessible" schools with accessibility to core campus spaces and features as well as programs and activities; and
- **Category 3:** "Core-Access" schools with certain common spaces made accessible to ensure a basic level of access to building such as parking, the main entrance and main office, assembly areas, and some restrooms.

[32] Los Angeles Unified School District. October 10, 2017. Self-Evaluation and Transition Plan. https://www.lausd.org/cms/lib/CA01000043/Centricity/Domain/821/AAA%20Self-Evaluation%20and%20Transition%20Plan%20Under%20the%20ADA%20APPROVED%20101017.pdf

In sum, Category 1 is the highest level of accessibility, whereas Category 2 is a program-accessible facility, and Category 3 is a base level of accessibility per the SET Plan.[33] Temporary building space would be provided to ensure the school is fully operational throughout construction.

After completion of the proposed Project, the City of Angels Community School program would remain elsewhere on Campus, and the Isana Octavia Charter School would be relocated off Campus.

The proposed Project is not anticipated to result in an increase in enrollment at Irving Middle School, as it would modernize the existing school for the safety of current students. When completed, there would be fewer classrooms, as the current 65 standard classrooms would be reduced to 46 standard classrooms.

2.6.4 Design Strategy

The proposed Project site design is strategically integrated with the architectural planning to best serve the needs of students, faculty, adjacent community and the District, while considering the Campus' existing historic elements. In addition to meeting essential functional and operational needs, the Campus landscape provides opportunities for students, faculty, and staff to engage with nature. The landscaped areas would serve multiple purposes: functional, educational, and experiential.

2.6.5 Circulation, Access, and Parking

Vehicular and pedestrian access to Irving MS is currently provided at all four streets surrounding the campus, with the main student entrances located on Estara Avenue and Marguerite Street. The proposed Project would improve portions of the parking lots and playgrounds that are located on District property (see development zone in Figure 2-8). Any areas located directly above the fault would be turned into outdoor areas, such as hardscape, landscape, or parking areas. The project site currently consists of 149 existing parking spaces of which 47 are unmarked compact spaces. During construction, a minimum of 80 parking stalls would be maintained, and after construction, a minimum of 104 stalls would be maintained. The project parking will be reduced by 69 parking spaces during construction and replaced with 24 new parking spaces for an overall total of 104 parking spaces for the proposed Project. According to ADA requirements per **Table 2.4, *ADA Requirements – Minimum Number of Accessible Spaces***, six accessible parking spaces will be required based on the total of 104 new parking spaces of which one of the six would be required to be a "Van-Accessible" space.[34]

TABLE 2-4
ADA REQUIREMENTS – MINIMUM NUMBER OF ACCESSIBLE SPACES

Total Number of Parking Spaces Provided in Parking Facility	Minimum Number of Accessible Parking Spaces (Car or Van)	Minimum Number of Van-Accessible Parking Spaces (1 for every 6 accessible spaces)
–101-150	5	1

Source: [1] ADA.gov – U.S. Department of Civil Rights Division. September 15, 2010. 2010 ADA Standards for Accessible Design. Available at: https://www.ada.gov/resources/restriping-parking-spaces/ (accessed July 22, 2024).

[33] Los Angeles Unified School District. October 10, 2017. Self-Evaluation and Transition Plan. https://www.lausd.org/cms/lib/CA01000043/Centricity/Domain/821/AAA%20Self-Evaluation%20and%20Transition%20Plan%20Under%20the%20ADA%20APPROVED%20101017.pdf

[34] ADA.gov – U.S. Department of Civil Rights Division. September 15, 2010. 2010 ADA Standards for Accessible Design. Available at: https://www.ada.gov/resources/restriping-parking-spaces/ (accessed July 22, 2024).

Vehicular Site Access

Irving MS provides existing vehicular access at the following locations:

- Vehicular Access 1 on Estara Avenue providing access along the abandoned Roswell Street, which runs through Campus and provides on-Campus parking
- Vehicular Access 2 on Fletcher Drive ("SpEd Bus Entrance") providing access to the abandoned Moss Street cul-de-sac, which runs through Campus and provides a connection to existing on-Campus parking locations
- Vehicular Access 3 near W Avenue 32
- Vehicular Access 4 on W Avenue 32

The proposed Project does not anticipate any reconfiguration or relocation of the four existing vehicular Campus points of entry. One new vehicular point of entry would potentially be added along Marguerite Street to provide access to new parking stalls (see Figure 2-8).

Pedestrian Site Access

Irving MS provides existing pedestrian access at the following locations:

- Three Pedestrian Field Gates providing access to the Athletic Field from Estara Avenue
- Pedestrian Gate ("Visitor Entrance") on Estara Avenue at Roswell Street
- Irving MS Main Entrance Gate – Pedestrian ("Main Gate") on Estara Avenue
- Pedestrian Gate on Marguerite Street
- Pedestrian Gate on Marguerite Street ("Octavia Gate 1" serving as the Charter School Entrance)
- Pedestrian Gate on W Avenue 32 ("Magnet Gate" serving as the Magnet and Lacer Program Entrance)
- Pedestrian Gate on Fletcher Drive ("Octavia Gate 3" serving as the City of Angels Entrance)
- Pedestrian Gate on Fletcher Drive ("Fletcher Gate")

After the proposed Project, all existing pedestrian points of entry would remain except for "Octavia Gate 3," which serves as the City of Angels Entrance along Fletcher Drive. This entrance would be relocated, as the City of Angels would be relocated on-campus. Pavement areas within the Project would include proper placement, mixing, and compaction of soil fills and maintain clearances of structural footings during trenching per the geotechnical report recommendations while maintaining paths to be ADA compliant. In addition, worn

down or damaged paths due to site construction shall be repaired. Concrete unit pavers should be used at key areas to define transitions between spaces on campus.[35]

On-Campus Circulation and Parking

On-campus circulation would be modified due to new and reconfigured landscaped, hardscaped, and parking areas on campus. The proposed Project would remove approximately 45 parking spaces south of Roswell Street in order to accommodate the new Administration and Classroom Building. Additional parking spaces on the Campus may be removed and/or reconfigured to accommodate new landscaping or hardscape areas such as basketball courts. Upon completion of the Project, the minimum parking requirements would either be met or exceeded based on the LAUSD School Design Guide and ADA standard requirements. Since the proposed project will be a design-build effort, the total parking spaces provided would be determined per LAUSD design guide and ADA standards during the design phase and in coordination with LAUSD. According to 28 CFR Part 35.151, *New Construction and Alterations* of the 2010 ADA Standards for Accessible Design, states that "A *"path of travel"* includes a continuous, unobstructed way of pedestrian passage by means of which the altered area may be approached, entered, and exited, and which connects the altered area with an exterior approach (including sidewalks, streets, and parking areas), an entrance to the facility, and other parts of the facility.[36] Furthermore, all design and elements of vehicle access, roadway and surface parking improvements, including size, configuration, vertical and horizontal alignment, lane widths, striping, signage, lighting and traffic control measures would comply with the California Manual on Uniform Traffic Control Devices,[37] City of Los Angeles, and California Building Code (CBC) Title 24 accessible standards.[38] Required parking and adequate vehicle circulation would also be maintained throughout the duration of construction. It is anticipated that construction worker parking would generally be accommodated on-site in the staging area during all phases of construction. Construction workers would not be permitted to park on local streets and would therefore not affect the current usage of street parking. Temporary parking and the construction staging, during construction, will be located within the Project development areas.

2.6.6 Landscape Improvements

The Campus is developed with buildings, paved areas (including parking lots, hardcourts, and walkways), and landscaped areas (including turf playfields and ornamental landscaping with trees, shrubs, and grass). There are currently over 120 trees within and along the boundaries of the Project site. There are 41 City of Los Angeles street trees that border the Project site along the sidewalks on Fletcher Drive, Estara Avenue, Marguerite Street, and W Avenue 32.

Landscaped and hardscaped areas would be designed to be located directly above the fault as only nonstructural construction is permitted in those areas. The proposed Project would include new landscaped areas that contribute to meeting the District Board's goal of 30 percent landscaped areas. The proposed Project would increase pervious ground cover by converting existing impervious areas (such as the existing Administration

[35] NAC Architecture for Los Angeles Unified School District. October 19, 2023. Irving Steam Magnet Middle School Criteria Documents.

[36] ADA.gov – U.S. Department of Civil Rights Division. September 15, 2010. 2010 ADA Standards for Accessible Design. Available at: https://www.ada.gov/law-and-regs/design-standards/2010-stds/ (accessed July 21, 2024).

[37] California Department of Transportation. January 11, 2024. California Manual on Uniform Traffic Control Devices. https://dot.ca.gov/programs/safety-programs/camutcd (accessed July 22, 2024).

[38] NAC Architecture for Los Angeles Unified School District. October 19, 2023. Irving Steam Magnet Middle School Criteria Documents.

Building, Classroom Building, Homemaking Building, hardscaped parking areas, and hardscaped recreation areas).

Tree Removal

Irving MS has several mature trees located on Campus. The Tree Inventory in the Site Analysis documented a total of 120 trees that were determined to be "protected" or "significant." Per the LAUSD Tree Trimming and Removal Procedure guidelines, "protected" trees include all indigenous oaks species (excluding scrub oak), western sycamore, American sycamore, Southern California black walnut, and California bay laurel, if they measure 4 inches or more in cumulative diameter at 4.5 feet above ground level at the base of the tree and were not grown as part of a tree planting program.[39] A "significant" tree is any tree with a trunk diameter of 8 inches or larger. Of the 120 trees inventoried on the Campus, four are protected, including one coast live oak and three western sycamore trees. The remaining 116 trees are significant and subject to the District's policies.

Figure 2-9, *Tree Inventory Status Map*, documents the existing trees inventoried on the Campus. Any "protected" tree under 4 inches in diameter and/or any "significant" tree under 8 inches in diameter was not documented. There are four protected trees located on the Campus, one of which requires removal under the proposed Project and is, therefore, subject to the LAUSD Tree Trimming and Removal Procedure guidelines.[40] The protected tree that would be removed is Tree #67 (western sycamore), which is located where the new Administration and Classroom Buildings would be constructed. The protected trees that would remain on the Campus are Trees #5, #16, and #115 (see **Appendix 1-C, *Tree Inventory from Site Analysis & Program Development Report***). Tree #5 (western sycamore) is located above the fault at the southern corner of Moss Avenue and Roswell Street, Tree #16 (western sycamore) is located next to the Shop #3 Building, and Tree #115 (coast live oak) is located along the southern edge of the Project site near the basketball courts.

As required by the LAUSD Tree Trimming and Removal Procedures, Tree #67 may be relocated or removed subject to submittal of a Tree Removal Application and approval by the Director of OEHS and replacement equivalent to the City of LA Tree Preservation Ordinance requirements.

Additionally, any corrective tree trimming or removal must also comply with LAUSD Tree Trimming and Removal Procedures. Tree trimming or removal shall be avoided during the avian breeding and nesting season (February 1st through August 31st) when feasible. For any work requiring tree removal, or pruning, the presence of culturally significant trees should be identified with the school administrator to determine if proposed activities may impact trees.

[39] Los Angeles Unified School District Office of Environmental Health & Safety. April 24, 2023. Tree Trimming & Removal Procedure. https://www.lausd.org/cms/lib/CA01000043/Centricity/Domain/135/LAUSD_Tree_Protection.pdf

[40] Los Angeles Unified School District Office of Environmental Health & Safety. April 24, 2023. Tree Trimming & Removal Procedure. https://www.lausd.org/cms/lib/CA01000043/Centricity/Domain/135/LAUSD_Tree_Protection.pdf

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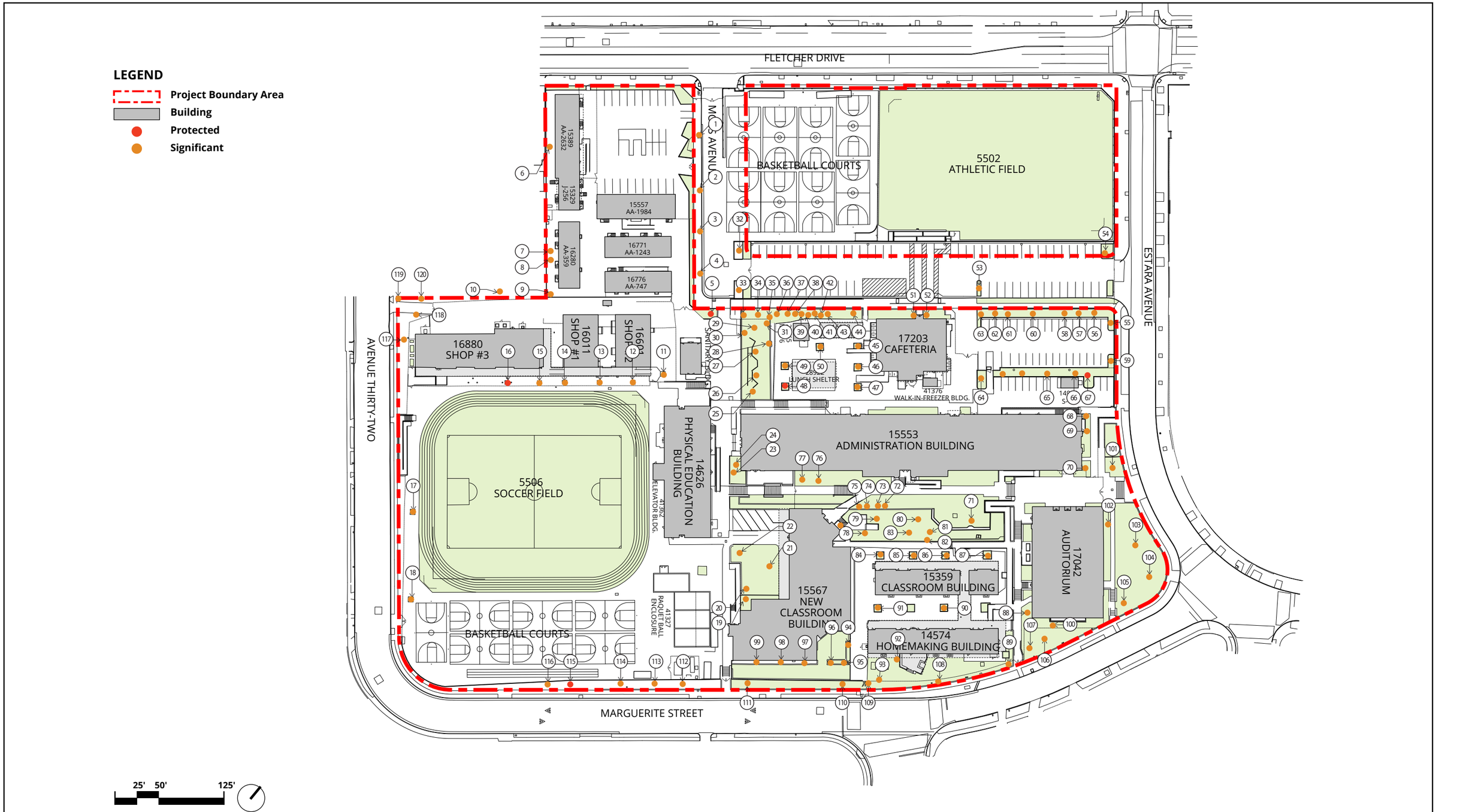

SOURCE: NAC Architecture. February 03, 2023. Prepared for Los Angeles Unified School District (LAUSD). Irving Steam Magnet Middle School Site Analysis & Program Development Report. Project No. 10372111. Page 2.4.21.

FIGURE 2-9
Tree Inventory Status Map

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2.6.7 Infrastructure and Utility Providers

The Project site is currently served by existing utilities. The Los Angeles Department of Water and Power (LADWP) provides electric and potable water service to the Project site. The Southern California Gas Company provides natural gas to the Project site. Sewer lines at the Project site are serviced by the City of Los Angeles Bureau of Sanitation. Storm drain lines that serve the school ultimately connect to the County of Los Angeles storm drain system network. As the proposed project would not be designed to increase enrollment, infrastructure and utility improvements would not be required to accommodate additional demand. Where necessary due to outdated infrastructure, site-wide infrastructure improvements would be completed as part of the proposed project for electrical, gas, sewer, water, and drainage.

2.6.8 Security and Safety Features

With the exception of areas where Campus buildings serve as walls along the perimeter, the Campus is surrounded by chain-link metal security fences. The proposed Project does not include any changes to the existing security and safety features of the Campus. Additional internal fencing would be installed to accommodate new parking areas. All new structures would be equipped with fire suppression sprinkler systems and lighting on the exterior walls. Existing fire alarm systems would be replaced with new, updated fire alarm systems with sprinkler protection systems. Site lighting would be designed to comply with the LAUSD School Design Guide[41] and Title 24 Part 6 requirements of the Building Energy Efficiency Standards[42] as well as the International Dark-Sky Association (IDA),[43] the illuminating Engineering Society (IES) Model Lighting ordinance (MLO)[44] which would provide guidance towards applying environmentally responsible outdoor lighting. The MLO has outdoor lighting standards that reduce glare, light trespass, and skyglow. The MLO uses lighting zones (LZ) 0 to 4, which allow the District to vary the lighting restrictions according to the sensitivity of the community. The MLO also incorporates the Backlight-Uplight Glare (BUG) rating system for luminaires, which provides more effective control of unwanted light. The MLO establishes standards to:

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

The framework would help with minimal offsite impact and contribution to sky glow by controlling the amount of uplight. New construction would use District-approved LED or fluorescent fixtures with occupancy/vacancy sensors, time clocks, daylight harvesting, dimming, and demand response controls. In addition, emergency exit illumination with a one foot-candle minimum would be included for areas such as

41 Los Angeles Unified School District. N.d. Design Standards & Technical Specifications. https://www.lausd.org/Page/18996 (accessed July 22, 2024).

42 California Energy Commission. August 2022. 2022 Building Energy Efficiency Standards for Residential and Nonresidential Buildings: Title 24, Part6 and Associated Administrative Regulations in Part 1. https://www.energy.ca.gov/sites/default/files/2022-08/CEC-400-2022-010_CMF.pdf

43 International Dark-Sky Association. N.d. International Dark Sky Places. https://darksky.org/what-we-do/international-dark-sky-places/ (accessed July 22, 2024).

44 Illuminating Engineering Society (IES). June 15, 2011. The IES Lighting Library Standards Collections. https://www.ies.org/standards/lighting-library/ (accessed July 22, 2024).

corridors, stairs, lobbies, and exterior paths of travel for exiting buildings, including: administration; classrooms larger than 1000 square feet or that have two egress doors; multi-purpose/auditorium; gymnasium; cafeteria; library; large instruction rooms; and other occupancies as required by code.

2.6.9 Sustainability Features

LAUSD is committed to sustainable construction principles and has been a member of the Collaborative for High Performance Schools (CHPS) since 2001. CHPS has established criteria for the development of high performance schools to create a better educational experience for students and teachers by designing the best facilities possible. CHPS-designed facilities are energy efficient, material efficient, easy to maintain and operate, environmentally responsive, safe and secure, a community resource, and adaptable to changing needs. The design team would be responsible for incorporating sustainability features for the proposed Project, including onsite treatment of stormwater runoff, "cool roof" building materials, lighting that reduces light pollution, water and energy-efficient design, water-wise landscaping, collection of recyclables, and sustainable and/or recycled-content building materials.

2.6.10 Soil Removal Plan

As a result of the findings of a Phase I ESA (see Appendix 1-A) prepared by Eco & Associates, Inc. in March 2022, a Preliminary Environmental Assessment Equivalent (PEA-E) Report (**Appendix 1-F**) was prepared by Civil-Environmental-Survey Group (CES) in May-October 2023 and approved by the LAUSD OEHS, followed by a Soil Removal Plan (SRP) (see **Appendix 4**), prepared by CES Group in December 2023 for the proposed Project. The SRP addresses the potential health risks to construction workers, onsite students and staff, and surrounding residents through the implementation of soil management processes intended to close potential exposure routes to potentially impacted soils. Construction activities would follow the recommendations and requirements specified in the SRP that includes items as:

- Excavation activities and offsite disposal
- Underground Storage Tanks (UST) removal
- Preparation of Soil Management Plan
- Air, wind and particulate monitoring
- Dust control
- Periodic Site Inspections

Also, refer to **Section 3.4, *Hazards and Hazardous Materials***, for detailed information regarding the recommendations and requirements.

2.6.11 Construction Schedule

Construction is planned to start in the first quarter (Q1) of 2026 and be completed by Q3 2029 (approximately 42 months). **Table 2-5, *Construction Schedule and Equipment***, summarizes the proposed construction activities and schedule for implementation of the proposed Project. Access would be provided throughout construction from Fletcher Avenue onto Moss Avenue and/or from Estara Avenue onto Roswell Street. It is anticipated that construction would be conducted in five phases:

- **Phase 1:** Set Up Interim Facility Space

  Prior to the demolition and construction of any structures, temporary interim facilities would be added to the campus to house classrooms during construction. The interim facilities would be located along Fletcher Avenue adjacent to the Athletic Field.

- **Phase 2:** Demolish Administration Building

- **Phase 3:** Construct New Administration and Classroom Building

  Staging is anticipated to move to where the Administration Building was located.

- **Phase 4:** Remove Homemaking Building, Classroom Building, Six Bungalows and Interim Housing

  a) **Phase 5:** Construct New M&O Building, New Modular Building for City of Angels, and Site Work Including Landscape, Hardscape, Parking

  The final stage of construction would involve any site work.

The construction schedule used in the EIR analysis represents a "worst-case" scenario as emission factors for construction equipment decrease as the phasing schedule time increases, due to improvements in technology and more stringent regulatory requirements. The duration of construction activities would be approximately 42 months, from Q1 2026 to Q3 2029, and the associated construction equipment represents a reasonable estimate of the construction fleet required. The construction scenario assumes activities would occur in the following phases: demolition, site preparation, grading, building construction, paving, and architectural coating. Construction equipment anticipated to be used for each phase, as listed in Table 2-5, was estimated based on projects of comparable size and land uses.

TABLE 2-5
CONSTRUCTION SCHEDULE AND EQUIPMENT

Schedule	# of Equipment	Equipment Type	# Hours/Day
Demolition			
1/12/2026 – 6/26/2026 (120 days)	1	Excavators	4
	1	Rubber tired dozers	2
Site Preparation			
6/27/2026 –1/22/2027 (150 days)	1	Tractors/loaders/backhoes	4
Building Construction			
1/23/2027 – 7/20/2029 (650 days)	1	Cranes	4
	1	Forklifts	4
	1	Generator sets	8
	1	Tractors/loaders/backhoes	7
	1	Welders	2
Paving			
7/21/2029 – 9/10/2029 (36 days)	1	Pavers	8
	1	Rollers	8
Architectural Coating			
9/11/2029 – 9/24/2029 (10 days)	1	Air compressors	6

Consistent with the City of Los Angeles Municipal Code, all non-emergency construction activities would occur between 7:00 a.m. and 9:00 p.m., Monday through Friday and 8:00 a.m. to 6:00 p.m. on Saturdays and national holidays.[45] Construction would be prohibited on Sundays.

The demolition phase would involve the use of heavy equipment to permanently remove 62,442 square feet of existing buildings. Site preparation activities would involve hand tools and minimal use of heavy equipment to water the proposed Project site following demolition, vegetation clearing, and the removal of unwanted materials at the proposed Project site. Portable buildings will also be removed during his phase and relocated during the construction phase.

Building construction involves the construction of the new pads for the relocation of the portable buildings and construction of the newly proposed buildings. Construction employees are anticipated to work at the proposed Project site for the duration of all construction phases, but site-specific construction fleet would vary due to specific Project needs at the time of construction. The final construction phase, including architectural coating, is required for the interior and exterior surfaces for the new educational and service buildings.

The proposed Project would comply with the District's Integrated Pest Management policy, which contains standards and guidelines for pest control at all LAUSD facilities.[46]

[45] City of Los Angeles Municipal Code, § 41.40(b).

[46] Los Angeles Unified School District. N.d. Integrated Pest Management (IPM). https://www.lausd.org/Page/18939 (accessed September 6, 2024).

2.7 Project Plan and Building Design

The Project is subject to the California Department of Education (CDE) design and siting requirements, and the school architectural designs are subject to review and approval by the California Division of the State Architect (DSA). The proposed Project, along with all other SUP-related projects, is required to comply with specific design standards and sustainable building practices. Certain standards assist in reducing environmental impacts, such as the California Green Building Code (CALGreen Code),[47] LAUSD Standard Conditions of Approval (SC), and the Collaborative for High-Performance Schools (CHPS) criteria.[48]

Any proposed art component considered for the proposed Project, which may include murals, signage, and other graphics, would be developed during design and subject to District approval.

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

Standard Conditions of Approval for District Construction, Upgrade, and Improvement Projects. SCs were adopted by the Board on December 12, 2023, with certification of the SPEIR. SCs are environmental standards that are applied to District construction, upgrade, and improvement projects and used by the LAUSD Office of Environmental Health and Safety (OEHS) to offset potential environmental impacts in CEQA analyses. The SCs were largely compiled from established LAUSD design guidelines and standards, best management practices (BMPs), and regulatory requirements and are required to be included in the construction specifications. For each SC, applicability is triggered by factors such as the project type and existing conditions. These SCs are implemented during the planning, construction, and/or operational phases of the projects.

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

Mitigation Measures. If, after incorporation and implementation of federal, State, and local regulations; CHPS prerequisite criteria; PDFs; and SCs, there are still significant environmental impacts, then feasible and

[47] California Green Building Standards Code, Title 24, Part 11.

[48] 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.

project-specific mitigation measures are required to reduce impacts to less than significant levels. Mitigation under CEQA Guidelines Section 15370 includes:

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

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

The specific CHPS prerequisite criteria and LAUSD SCs are identified in the tables under each CEQA topic.[49] 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.

2.8 Project Approvals

It is anticipated that approval required for the proposed Project would include, but may not be limited to, those listed below.

LAUSD

LAUSD Board of Education to review and approve the proposed project prior to permitting.

Responsible Agencies

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

- California Department of General Services, Division of State Architect (DSA). Approval of site-specific construction drawings.
- South Coast Air Quality Management District (SCAQMD) Permit for compliance with Rule 1166
- Los Angeles Regional Water Quality Control Board. General Construction Activity Permit, including the Storm Water Pollution Prevention Plan.
- City of Los Angeles Public Works Department. Permit for curb, gutter, driveways, and other offsite improvements.
- City of Los Angeles Fire Department. Approval of plans for emergency access and emergency evacuation as well as fire hydrants pursuant to the Los Angeles Fire Code and part of DSA permit approval.
- City of Los Angeles Department of Building & Safety. Approval of haul route.

[49] CHPS criteria are summarized. The full requirement can be found at http://www.chps.net/dev/Drupal/California.

Trustee Agencies

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

State

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

Regional

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

Local

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

2.9 Related Projects

Section 15130 of the CEQA Guidelines requires that an EIR consider the significant environmental effects of a project as well as "cumulative impacts." A cumulative impact is defined as an impact that is created as a result of the combination of the project evaluated in the EIR together with other projects causing related impacts (CEQA Guidelines Section 15355). As stated in the CEQA Guidelines Section 15130(a)(1), the cumulative impacts discussion in an EIR need not discuss impacts that do not result in part from the project evaluated in the EIR. All projects that are proposed (i.e., with pending applications), recently approved, under construction, or otherwise reasonably foreseeable that could produce a cumulative impact on the local environment when considered in conjunction with a project are required to be evaluated in an EIR. These projects can include, if necessary, projects outside of the control of the lead agency. If a concise list of related projects is not available, cumulative impacts may be analyzed using the regional or area-wide growth projections contained in an adopted or certified general plan or related planning document.

Section 4.8.2, *Achievements*, of the SUP EIR lists the 22 comprehensive modernization projects that have been completed under the Repair and Modernization Program, as well as six out of seven major modernization planning projects that have been approved for project definition by the LAUSD Board of Education, including the proposed Project (**Table 2-6, *Related Projects***).

TABLE 2-6
RELATED PROJECTS

School Campus[1]	Proximity to Project Site	Project Status[2]	Planned Construction Period[2]
32nd Street/USC Performing Arts Magnet	6.6 miles south	CEQA documentation is not yet on LAUSD CEQA website	TBD
49th Street ES	8.1 miles south	Final Negative Declaration (ND) was adopted by the Board of Education on April 9, 2024 (approved)	Q2 2025 to Q2 2029
Canoga Park High School (HS)	21.3 miles northwest	Final ND was adopted by the Board of Education on May 7, 2024 (approved)	Q4 2025 to Q4 2029
Fairfax HS	7.1 miles southwest	CEQA documentation is not yet on LAUSD CEQA website	TBD
Garfield HS	7.7 miles southeast	Preparation of Final Mitigated Negative Declaration (MND) is underway (April-May 2024 public review)	Q1 2026 to Q3 2029
Sylmar Charter HS	17.3 miles northwest	CEQA documentation is not yet on LAUSD CEQA website	TBD

Source: [1] Los Angeles Unified School District. December 13, 2023. Los Angeles Unified School District School Upgrade Program Subsequent EIR. https://ceqanet.opr.ca.gov/2023010013/2
[2] Los Angeles Unified School District Office of Environmental Health & Safety. N.d. CEQA Documents. https://www.lausd.org/Page/2799 (accessed July 22, 2024).

In addition to these seven planned LAUSD school modernization projects, the City of Los Angeles environmental planning website identifies one planned project approximately 0.4 mile southwest of the project Site at 2800 Cassitas Avenue (formerly referred to the Bow Tie Yard Lofts Project), which would involve the demolition of an existing 117,000-square-foot manufacturing/warehouse/production building and construction of a mixed-use development with up to 419 multi-family residential units, up to 64,000 square feet of commercial space, and a multi-story parking structure.[50] The schedule for this planned project is unknown, as a Draft EIR was re-circulated for public review in 2021 and no Final EIR has been published to date. No other related projects were identified from review of the City of Los Angeles website within a mile radius of the Project site.

[50] Los Angeles City Planning. N.d. New Comment Period: April 15, 2021-June 1, 2021. 2800 Casitas Avenue Project (formerly the Bow Tie Yard Lofts Project). https://planning.lacity.gov/development-services/eir/2800-casitas-avenue-project-formerly-bow-tie-yard-lofts-project-0

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CHAPTER 3

Environmental Analysis

This Draft EIR is prepared in accordance with CEQA (California Public Resources Code, Section 21000 et seq.), the CEQA Guidelines (California Code of Regulations, Title 14, Section 15000 et seq.), and applicable rules and regulations of regional and local entities. This Draft EIR evaluates the potential environmental impacts associated with the construction and operation of the proposed Project and is intended to serve as an informational document for the public agency decision-makers and the public regarding the proposed Project.

3.1 Air Quality

This section evaluates impacts related to air emissions generated by construction and operation of the proposed Project. The analysis also addresses consistency of the Project with air quality policies set forth within the South Coast Air Quality Management District's (SCAQMD) Air Quality Management Plan (AQMP), City of Los Angeles General Plan Air Quality Element, and LAUSD. The analysis of project-generated air emissions focuses on whether the Project would cause exceedance of an ambient air quality standard, or a SCAQMD significance threshold. Details regarding the air quality analysis are provided in Appendix 6, *Emissions Calculations,* of this Draft EIR.

3.1.1 Environmental Setting

Regional Air Quality

The proposed Project site is located in the South Coast Air Basin (SCAB) and the SCAQMD. Approximately 12,000 square miles span SCAB's jurisdiction, consisting of Orange County and the urbanized areas of San Bernardino, Riverside, and Los Angeles counties. The SCAB is a coastal plain with connecting broad valleys and low hills, bounded by the Pacific Ocean to the southwest and high mountains around the perimeter. The boundaries of the SCAB were altered in May 1996 by the California Air Resources Board (CARB) to include the Beaumont-Banning area. The distinctive climate of the SCAB is determined by its terrain and geographic location. The general region lies in the semipermanent high-pressure zone of the eastern Pacific, resulting in a mild climate tempered by cool sea breezes with light average wind speeds. The usually mild climatological pattern is interrupted occasionally by periods of extremely hot weather, winter storms, or Santa Ana winds. The SCAB is classified as a dry-hot desert climate.[1]

The vertical dispersion of air pollutants in the SCAB is hampered by the presence of persistent temperature inversions. High-pressure systems, such as the semipermanent high-pressure zone in which the SCAB is located, are characterized by an upper layer of dry air that warms as it descends, restricting the mobility of cooler marine-influenced air near the ground surface, and resulting in the formation of subsidence inversions. These inversions restrict the vertical dispersion of air pollutants released into the marine layer and, together with strong sunlight, can produce worst-case conditions for the formation of photochemical smog. The basin-wide occurrence of inversions at 3,500 feet above sea level or less averages 191 days per year.[2]

The atmospheric pollution potential of an area is largely dependent on winds, atmospheric stability, solar radiation, and terrain. The combination of low wind speeds and low inversions produces the greatest concentration of air pollutants. On days without inversions, or on days of winds averaging over 15 miles per hour, smog potential is greatly reduced.[3] Meteorological data from a weather station located in downtown Los Angeles (USC Campus) has indicated that the average high of 83.1 degrees Fahrenheit (°F) occurs during the summer months, and a low of 48.3°F occurs in the winter months. The average annual maximum temperature is 74.0°F, and the average annual minimum temperature is 55.8°F. Very little rainfall or no rainfall at all occurs

[1] South Coast Air Quality Management District. April 1993. CEQA Air Quality Handbook, p. A8-1.

[2] South Coast Air Quality Management District. April 1993. CEQA Air Quality Handbook, p. A8-2.

[3] South Coast Air Quality Management District. April 1993. CEQA Air Quality Handbook.

during the summer months. Rainfall typically occurs from October through April, providing an average annual rainfall of 14.8 inches of rain.

The SCAB exceeds federal standards for ozone, particulate matter 10 microns or less in diameter, or respirable particulate matter (PM_{10}), particulate matter 2.5 microns or less in diameter, or fine particulate matter ($PM_{2.5}$), and lead. Section 107 of the 1977 Clean Air Act (CAA) Amendment mandates the EPA to publish a list of geographic areas and their compliance with National Ambient Air Quality Standards (NAAQS). A non-attainment status is attached to areas not in compliance with NAAQS and can be categorized into four designations of increasing severity: (1) moderate, (2) serious, (3) severe, and (4) extreme. Designations are assigned on a pollutant-by-pollutant basis. The U.S. Environmental Protection Agency (EPA) has classified the project area as an extreme nonattainment area for ozone and a moderate nonattainment area for $PM_{2.5}$ (**Table 3.1-1, *Attainment Area Designations in Project Area***). Mobile sources, including cars, trucks, and off-road equipment, are the largest contributors to the formation of ozone, $PM_{2.5}$, diesel particulate matter, and greenhouse gas (GHG) emissions in California. The CARB developed a suite of mobile sources. The project area is in nonattainment status for the 8-hour ozone state and federal standard, PM_{10} state standard, and $PM_{2.5}$ state and federal standard.

TABLE 3.1-1
ATTAINMENT AREA DESIGNATIONS IN PROJECT AREA

Criteria Pollutant	California State Standards	Federal Standards
8-hr Ozone (O_3) (2008)	Nonattainment	Extreme nonattainment
1-hr Nitrogen dioxide (NO_2) (1971)	Attainment	Attainment/maintenance
1-hr Carbon monoxide (CO) (1971)	Attainment	Attainment/maintenance
Respirable particulate matter (PM_{10}) (1987)	Nonattainment	Attainment/maintenance
Fine particulate matter ($PM_{2.5}$) (2012)	Nonattainment	Moderate nonattainment
Sulfur dioxide (SO_2) (2010)	Attainment	Attainment
Lead (Pb) (2008)	Attainment	Nonattainment
Sulfates	Attainment	N/A
Hydrogen sulfide (HS)	Unclassified	N/A
Visibility reducing particles	Unclassified	N/A

Source: U.S. Environmental Protection Agency. 1 February 2016. U.S. EPA green book. Current nonattainment counties for all criteria pollutants. https://www.epa.gov/green-book
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Local Air Quality

Existing Ambient Air Quality in the Project Area

SCAB air pollutant levels are measured by the CARB-maintained air monitoring stations. The nearest monitoring station to the project site is the Los Angeles Monitoring Station, located at 1630 N. Main St, Los Angeles, California 90012, which is approximately 3.7 miles southeast of the proposed project site (**Table 3.1-2, *Summary of Ambient Air Quality at the Los Angeles Monitoring Station***). Designations for attainment are determined from the ambient air quality. Table 3.1-2 shows pollutant levels, state and federal standards, and the number of record exceedances at the Los Angeles Monitoring Station between 2020 and 2022. The state and federal standards for 8-hour O_3 were exceeded 2-22 times within this time frame. PM_{10} and nitrogen dioxide (NO_2) did not exceed the NAAQS between 2020 and 2022. The federal standards for NO_2, PM_{10} and $PM_{2.5}$ and the state standard for NO_2 were not exceeded during this time frame. $PM_{2.5}$ emissions spiked in 2020, which then decreased in 2021.

Sensitive Receptors

Certain population groups, such as children, elderly, and acutely and chronically ill persons (especially those with cardio-respiratory diseases), are considered more sensitive to the effects of air pollution than others. For the purposes of CEQA, the SCAQMD considers a sensitive receptor to be a location where a sensitive individual could remain for 24 hours, such as residences, hospitals, or convalescent facilities.[4] As shown in **Figure 3.1-1, *Air Quality Sensitive Receptors***, the nearest sensitive receptors are the existing students at Irving MS and Isana Octavia Charter Academy; Fletcher Drive Elementary School, located approximately 422 feet northwest from construction activity); Juntos Park, located approximately 1,220 feet northwest from construction activity; Drew Street Park, located approximately 948 feet north of construction activity; multi-family residential, located approximately 130 feet west and south of construction activity; and single-family residential areas, located approximately 298 feet southeast of construction activity.

All other air quality sensitive receptors are located at greater distances from the Project site and would be less impacted by Project emissions.

[4] South Coast Air Quality Management District. July 2008. Final Localized Significance Threshold Methodology. https://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/final-lst-methodology-document.pdf?sfvrsn=2

TABLE 3.1-2
SUMMARY OF AMBIENT AIR QUALITY AT LOS ANGELES MONITORING STATION

Pollutant	Year		
	2020	2021	2022
Ozone			
Maximum 1-hr concentration (ppm)	0.185	0.099	0.138
Days exceeding CAAQS (0.09 ppm)	14	1	1
Days exceeding NAAQS (ppm)	1	0	1
State maximum 8-hour concentration (ppm)	0.118	0.086	0.091
National maximum 8-hour concentration (ppm)	0.118	0.085	0.090
Days exceeding CAAQS (0.070 ppm)	22	2	6
Days exceeding NAAQS (0.070 ppm)	22	2	6
$PM_{2.5}$			
National maximum 24-hour concentration (µg/m^3)	175.0	61.0	33.7
State maximum 24-hour concentration (µg/m^3)	175.0	61.1	38.0
Measured days exceeding NAAQS (35 µg/m^3)	12	13	0
AAM (µg/m^3)	13.7	12.8	10.9
Does measured AAM exceed NAAQS (15 µg/m^3)?	No	No	No
Does measured AAM exceed CAAQS (12 µg/m^3)?	Yes	Yes	No
PM_{10}			
National maximum 24-hour concentration (µg/m^3)	83.7	64.0	61.0
State maximum 24-hour concentration (µg/m^3)	185.2	138.5	43.7
Measured days exceeding NAAQS (150 µg/m^3)	0	0	0
Measured days exceeding CAAQS (50 µg/m^3)	34	14	0
AAM (µg/m^3)	33.1	26.0	29.4
Does measured AAM exceed NAAQS (no standard)?	*	*	*
Does measured AAM exceed CAAQS (20 µg/m^3)?	Yes	Yes	Yes
NO_2			
National maximum 1-hour concentration (ppb)	61.8	77.8	75.1
State maximum 1-hour concentration (ppb)	61.0	77.0	75.0
Days exceeding NAAQS (0.100 ppm)	0	0	0
Days exceeding CAAQS (0.18 ppm)	0	0	0
State AAM (ppb)	17.0	17.0	18
Does measured AAM exceed NAAQS (0.053 ppm)?	No	No	No
Does measured AAM exceed CAAQS (0.03 ppm)?	No	No	No
CO (not measured at Los Angeles monitoring station)			
SO_2 (not measured at Los Angeles monitoring station)			
HS (not measured at Los Angeles monitoring station)			

Note: ppm = parts per million by volume; µg/m^3 = micrograms per cubic meter; AAM = annual average; CO = carbon monoxide; SO_2 = sulfur dioxide; HS = hydrogen sulfide; CAAQS = California Ambient Air Quality Standards; NAAQS = the National Ambient Air Quality Standards; ppb = parts per billion by volume; * Denotes insufficient data.

Source: California Air Resources Board. N.d. Top 4 Summary: Select Pollutant, Years, & Area. http://www.arb.ca.gov/adam/topfour/topfour1.php (accessed January 23, 2023).

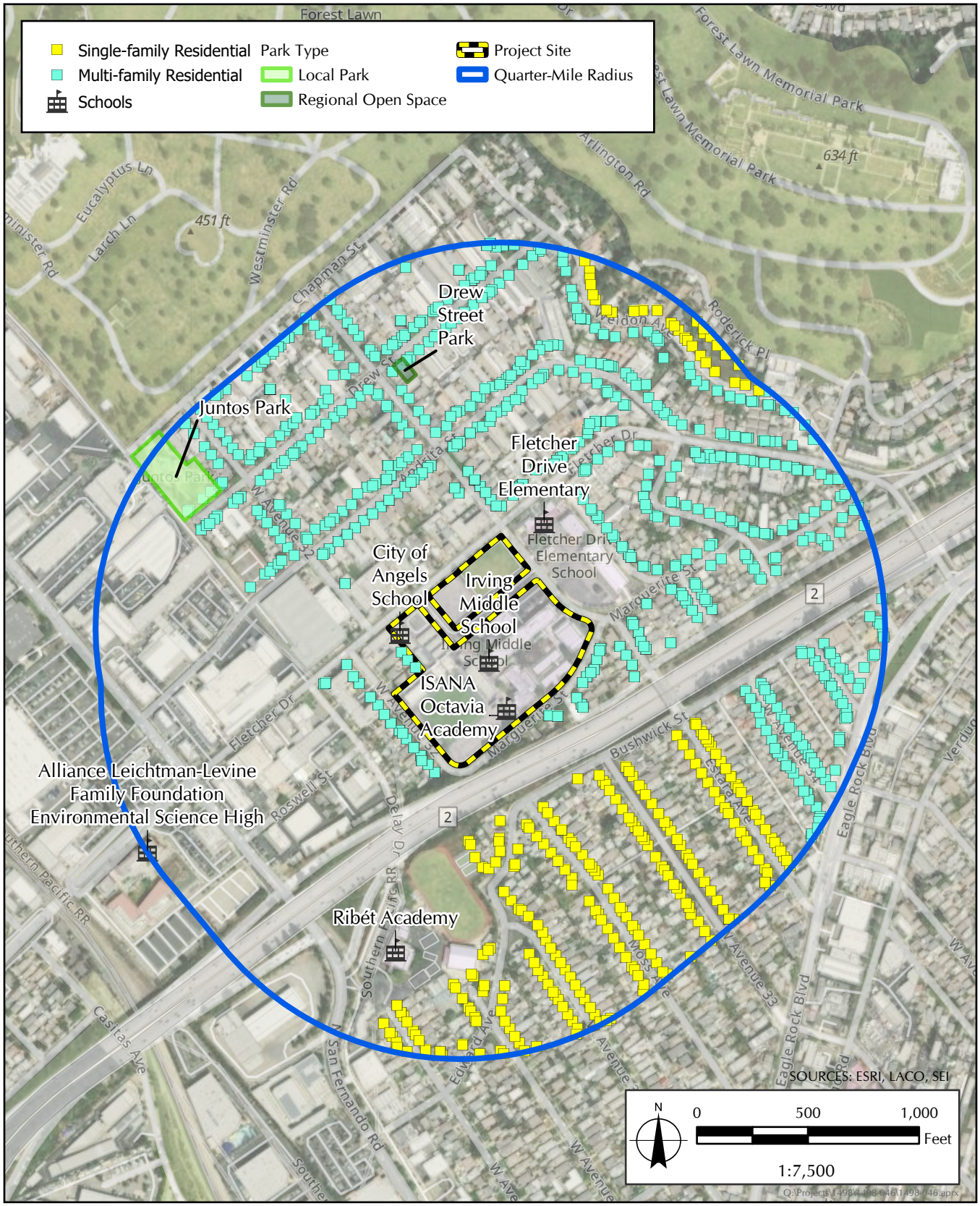

FIGURE 3.1-1
Sensitive Receptors

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Working Definitions

Concentrations: The amount of pollutant material per volumetric unit of air, measured in parts per million (ppm) or micrograms per cubic meter (μg/m3). The definitions below identify the pollutants included in this analysis.

Criteria Pollutants: Health-based air quality standards have been established by California and the federal government for the following criteria pollutants: carbon monoxide (CO), ozone (O_3), NO_2, sulfur dioxide (SO_2), $PM_{2.5}$, PM_{10}, and lead (Pb). California also includes standards for hydrogen sulfide, vinyl chloride, sulfates, and visibility. The pollutants are described below, with a summary of the health effects for each criteria pollutant.

Carbon Monoxide (CO): CO is a colorless, odorless, relatively inert gas. It is a trace constituent in the unpolluted troposphere and is produced by both natural processes and human activities. In remote areas far from human habitation, carbon monoxide occurs in the atmosphere at an average background concentration of 0.04 ppm, primarily as a result of natural processes such as forest fires and the oxidation of methane. Global atmospheric mixing of CO from urban and industrial sources creates higher background concentrations (up to 0.20 ppm) near urban areas. The major source of CO in urban areas is incomplete combustion of carbon containing fuels, mainly gasoline. CO concentrations are generally highest in the vicinity of major concentrations of vehicular traffic. CO is a primary pollutant, meaning that it is directly emitted into the air, not formed in the atmosphere by chemical reaction of precursors, as is the case with ozone and other secondary pollutants. Ambient concentrations of CO exhibit large spatial and temporal variations due to variations in the rate at which CO is emitted and in the meteorological conditions that govern transport and dilution. Unlike ozone, CO tends to reach high concentrations in the fall and winter months. The highest concentrations frequently occur on weekdays at times consistent with rush hour traffic and late night during the coolest, most stable portion of the day.

Individuals with a deficient blood supply to the heart are the most susceptible to the adverse effects of CO exposure. The effects observed include earlier onset of chest pain with exercise, and electrocardiograph changes indicative of worsening oxygen supply to the heart. Inhaled CO has no direct toxic effect on the lungs but exerts its effect on tissues by interfering with oxygen transport by competing with oxygen to combine with hemoglobin present in the blood to form carboxyhemoglobin (COHb). Hence, conditions with an increased demand for oxygen supply can be adversely affected by exposure to CO. Individuals most at risk include patients with diseases involving heart and blood vessels, fetuses (unborn babies), and patients with chronic hypoxemia (oxygen deficiency) as seen in high altitudes. Reductions in birth weight and impaired neurobehavioral development have been observed in animals chronically exposed to CO, resulting in COHb levels similar to those observed in smokers. Recent studies have found increased risks for adverse birth outcomes with exposure to elevated CO levels. These include preterm births and heart abnormalities.

Ozone (O_3): Ozone, a colorless gas with a sharp odor, is a highly reactive form of oxygen. High ozone concentrations exist naturally in the stratosphere. Some mixing of stratospheric ozone downward through the troposphere to the earth's surface does occur; however, the extent of ozone transport is limited. At the earth's surface in sites remote from urban areas, ozone concentrations are normally very low (e.g., from 0.03 ppm to 0.05 ppm).

While ozone is beneficial in the stratosphere because it filters out skin-cancer-causing ultraviolet radiation, it is a highly reactive oxidant. It is this reactivity that accounts for its damaging effects on materials, plants, and

human health at the earth's surface. The propensity of ozone for reacting with organic materials causes it to be damaging to living cells. Ozone enters the human body primarily through the respiratory tract and causes respiratory irritation and discomfort, makes breathing more difficult during exercise, and reduces the respiratory system's ability to remove inhaled particles and fight infection. Individuals exercising outdoors, children, and people with preexisting lung disease, such as asthma and chronic pulmonary lung disease, are considered to be the most susceptible subgroups for ozone effects. Short-term exposures (lasting for a few hours) to ozone at levels typically observed in Southern California can result in breathing pattern changes, reduction of breathing capacity, increased susceptibility to infections, inflammation of the lung tissue, and some immunological changes. In recent years, a correlation between elevated ambient ozone levels and increases in daily hospital admission rates, as well as mortality, has also been reported. An increased risk for asthma has been found in children who participate in multiple sports and live in high-ozone communities. Elevated ozone levels are also associated with increased school absences. Ozone exposure under exercising conditions is known to increase the severity of the abovementioned observed responses. Animal studies suggest that exposures to a combination of pollutants that includes ozone may be more toxic than exposure to ozone alone. Although lung volume and resistance changes observed after a single exposure diminish with repeated exposures, biochemical and cellular changes appear to persist, which can lead to subsequent lung structural changes.

Nitrogen Dioxide and Nitric Oxide (NO): NO_2 is a reddish-brown gas with a bleach-like odor. Nitric oxide (NO) is a colorless gas, formed from the nitrogen and oxygen in air under conditions of high temperature and pressure which are generally present during combustion of fuels; NO reacts rapidly with the oxygen in air to form NO_2. NO_2 is responsible for the brownish tinge of polluted air. The two gases, NO and NO_2, are referred to collectively as nitrous oxide (NO_x). In the presence of sunlight, NO_2 reacts to form nitric oxide and an oxygen atom. The oxygen atom can react further to form ozone, via a complex series of chemical reactions involving hydrocarbons. NO_2 may also react to form nitric acid (HNO_3), which reacts further to form nitrates, components of $PM_{2.5}$ and PM_{10}.

Population-based studies suggest that an increase in acute respiratory illness, including infections and respiratory symptoms in children (not infants), is associated with long-term exposures to NO_2 at levels found in homes with gas stoves, which are higher than ambient levels found in Southern California. Increase in resistance to air flow and airway contraction is observed after short-term exposure to NO_2 in healthy subjects. Larger decreases in lung functions are observed in individuals with asthma and/or chronic obstructive pulmonary disease (e.g., chronic bronchitis, emphysema) than in healthy individuals, indicating a greater susceptibility of these subgroups. More recent studies have found associations between NO_2 exposures and cardiopulmonary mortality, decreased lung function, respiratory symptoms, and emergency room asthma visits. In animals, exposure to levels of NO_2 considerably higher than ambient concentrations result in increased susceptibility to infections, possibly due to the observed changes in cells involved in maintaining immune functions. The severity of lung tissue damage associated with high levels of ozone exposure increases when animals are exposed to a combination of ozone and NO_2.

Sulfur Dioxide: A key criteria pollutant, SO_2 (sulfur dioxide), is a type of sulfate. SO_2 is a colorless gas with a sharp odor. It reacts in the air to form sulfuric acid (H_2SO_4), which contributes to acid precipitation, and sulfates, which are components of PM_{10} and $PM_{2.5}$. Most of the SO_2 emitted into the atmosphere is produced by burning sulfur containing fuels.

Exposure of a few minutes to low levels of SO_2 can result in airway constriction in some asthmatics. All asthmatics are sensitive to the effects of SO_2. In asthmatics, increase in resistance to air flow, as well as reduction

in breathing capacity leading to severe breathing difficulties, is observed after acute higher exposure to SO_2. In contrast, healthy individuals do not exhibit similar acute responses even after exposure to higher concentrations of SO_2. Animal studies suggest that despite SO_2 being a respiratory irritant, it does not cause substantial lung injury at ambient concentrations. However, very high levels of exposure can cause lung edema (fluid accumulation), lung tissue damage, and sloughing off of cells lining the respiratory tract. Some population-based studies indicate that the mortality and morbidity effects associated with fine particles show a similar association with ambient SO_2 levels. In these studies, efforts to separate the effects of SO2 from those of fine particles have not been successful. It is not clear whether the two pollutants act synergistically or one pollutant alone is the predominant factor.

Particulate Matter: Of great concern to public health are the particles small enough to be inhaled into the deepest parts of the lung. Respirable particles (PM_{10}) consist of suspended particles or droplets 10 micrometers or smaller in diameter. Some sources of PM_{10}, like pollen and windstorms, are naturally occurring. However, in populated areas, most PM_{10} is caused by road dust, diesel soot, combustion products, abrasion of tires and brakes, and construction activities. Sources of fine particulate matter ($PM_{2.5}$) include fuel combustion from automobiles, power plants, wood burning, industrial processes, and diesel-powered vehicles such as buses and trucks. These fine particles are also formed in the atmosphere when gases such as SO_2, NO_X, and ROGs are transformed in the air by chemical reactions.

$PM_{2.5}$ and PM_{10} pose a greater health risk than larger-size particles. When inhaled, these tiny particles can penetrate the human respiratory system's natural defenses and damage the respiratory tract. $PM_{2.5}$ and PM_{10} can increase the number and severity of asthma attacks, cause or aggravate bronchitis and other lung diseases, and reduce the body's ability to fight infections. Children, the elderly, exercising adults, and those suffering from asthma are especially vulnerable to adverse health effects of PM_{10} and $PM_{2.5}$. A consistent correlation between elevated ambient fine PM_{10} and $PM_{2.5}$ levels and an increase in mortality rates, respiratory infections, number and severity of asthma attacks, and the number of hospital admissions has been observed in different parts of the United States and various areas around the world. Studies have reported an association between long-term exposure to air pollution dominated by fine particles ($PM_{2.5}$) and increased mortality, reduction in lifespan, and an increased mortality from lung cancer. Daily fluctuations in fine particulate matter concentration levels have also been related to hospital admissions for acute respiratory conditions, to school and kindergarten absences, to a decrease in respiratory function in normal children and to increased medication use in children and adults with asthma. Studies have also shown lung function growth in children is reduced with long-term exposure to particulate matter. In addition to children, the elderly, and people with preexisting respiratory and/or cardiovascular disease appear to be more susceptible to the effects of PM_{10} and $PM_{2.5}$.

Lead (Pb): Lead in the atmosphere is present as a mixture of a number of lead compounds. Leaded gasoline and lead smelters have been the main sources of lead emitted into the air. Due to the phasing out of leaded gasoline, there was a dramatic reduction in atmospheric lead in Southern California over the past three decades.

Fetuses, infants, and children are more sensitive than others to the adverse effects of lead exposure. Exposure to low levels of lead can adversely affect the development and function of the central nervous system, leading to learning disorders, distractibility, inability to follow simple commands, and lower intelligence quotient. In adults, increased lead levels are associated with increased blood pressure. Lead poisoning can cause anemia, lethargy, seizures, and death. It appears that there are no direct effects of lead on the respiratory system. Lead can be stored in the bone from early age environmental exposure, and elevated blood lead levels can occur due to breakdown of bone tissue during pregnancy, hyperthyroidism (increased secretion of hormones from the

thyroid gland), and osteoporosis (breakdown of bone tissue). Fetuses and breast-fed babies can be exposed to higher levels of lead because of previous environmental lead exposure of their mothers.

Hydrogen Sulfide: Hydrogen sulfide is a flammable, colorless gas that smells like rotten eggs. People usually can smell hydrogen sulfide at low concentrations in air ranging from 0.0005 to 0.3 ppm. Hydrogen sulfide occurs naturally in crude petroleum, natural gas, volcanic gases, and hot springs. It can also result from bacterial breakdown of organic matter. Bacteria found in your mouth and digestive tract produce hydrogen sulfide during the digestion of food containing vegetable or animal proteins. Industrial sources of hydrogen sulfide include petroleum refineries, natural gas plants, petrochemical plants, coke oven plants, food processing plants, and tanneries.

Studies in humans suggest that the respiratory tract and nervous system are the most sensitive targets of hydrogen sulfide toxicity. Exposure to low concentrations of hydrogen sulfide may cause irritation to the eyes, nose, or throat. It may also cause difficulty in breathing for some asthmatics. Respiratory distress or arrest has been observed in people exposed to very high concentrations of hydrogen sulfide. Exposure to low concentrations of hydrogen sulfide may cause headaches, poor memory, tiredness, and balance problems. Brief exposures to high concentrations of hydrogen sulfide can cause loss of consciousness. In most cases, the person appears to regain consciousness without any other effects. However, in some individuals, there may be permanent or long-term effects such as headaches, poor attention span, poor memory, and poor motor function.

Vinyl Chloride: Vinyl chloride is a colorless, flammable gas at ambient temperature and pressure. At room temperature, vinyl chloride is a gas with a sickly-sweet odor that is easily condensed. However, it is stored as a liquid. Due to the hazardous nature of vinyl chloride to human health there are no end products that use vinyl chloride in its monomer form. Vinyl chloride is a chemical intermediate, not a final product. It is an important industrial chemical chiefly used to produce polymer polyvinyl chloride (PVC). The process involves vinyl chloride liquid fed to polymerization reactors where it is converted from a monomer to a polymer PVC. The final product of the polymerization process is PVC in either a flake or pellet form. Billions of pounds of PVC are sold on the global market each year. From its flake or pellet form, PVC is sold to companies that heat and mold the PVC into end products such as PVC pipe and bottles.

Vinyl chloride is highly toxic and is classified by the American Conference of Governmental Industrial Hygienists (ACGIH) as A1 (confirmed carcinogen in humans) and by the International Agency for Research on Cancer (IARC) as 1 (known to be a human carcinogen).

Sulfates (SO_x): Sulfates are chemical compounds which contain the sulfate ion and are part of the mixture of solid materials that make up PM_{10}. Most of the sulfates in the atmosphere are produced by oxidation of SO_2. Oxidation of sulfur dioxide yields sulfur trioxide (SO_3), which reacts with water to form sulfuric acid, which contributes to acid deposition. The reaction of sulfuric acid with basic substances such as ammonia yields sulfates, a component of PM_{10} and $PM_{2.5}$.

Most of the health effects associated with fine particles and SO_2 at ambient levels are also associated with SO_x. Thus, both mortality and morbidity effects have been observed with an increase in ambient SO_x concentrations. However, efforts to separate the effects of SO_x from the effects of other pollutants have generally not been successful. Clinical studies of asthmatics exposed to sulfuric acid suggest that adolescent asthmatics are possibly a subgroup susceptible to acid aerosol exposure. Animal studies suggest that acidic particles such as sulfuric

acid aerosol and ammonium bisulfate are more toxic than nonacidic particles like ammonium sulfate. Whether the effects are attributable to acidity or to particles remains unresolved.

Visibility: With the exception of Lake County, which is designated in attainment, all of the air districts in California are currently designated as unclassified with respect to the California Ambient Air Quality Standards (CAAQS) for visibility reducing particles. (A pollutant is designated unclassified if the data are incomplete and do not support a designation of attainment or nonattainment.)

Since deterioration of visibility is one of the most obvious manifestations of air pollution and plays a major role in the public's perception of air quality, the state of California has adopted a standard for visibility or visual range. Until 1989, the standard was based on visibility estimates made by human observers. The standard was changed to require measurement of visual range using instruments that measure light scattering and absorption by suspended particles. The visibility standard is based on the distance that atmospheric conditions allow a person to see at a given time and location. Visibility reduction from air pollution is often due to the presence of sulfur and nitrogen oxides, as well as particulate matter. Visibility degradation occurs when visibility reducing particles are produced in sufficient amounts such that the extinction coefficient is greater than 0.23 inverse kilometers (to reduce the visual range to less than 10 miles) at relative humidity less than 70 percent, 8-hour average (from 10:00 a.m. to 6:00 p.m.) according to the state standard.

Volatile Organic Compounds (VOCs): Reactive organic gases (ROGs) are referred to as reactive organic compounds (ROCs) or VOCs. ROGs are compounds composed primarily of hydrogen and carbon atoms. Internal combustion associated with motor vehicle usage is the major source of hydrocarbons. Adverse effects on human health are not caused directly by ROGs, but rather by reactions of ROGs to form secondary air pollutants, including ozone. ROGs themselves are not criteria pollutants; however, they contribute to formation of ozone. It should be noted that there are no state or national ambient air quality standards for VOCs because they are not classified as criteria pollutants. VOCs are regulated, however, because limiting VOC emissions reduces the rate of photochemical reactions that contribute to the formation of ozone. VOCs are also transformed into organic aerosols in the atmosphere, contributing to higher PM_{10} and lower visibility levels.

Although health-based standards have not been established for VOCs, health effects can occur from exposures to high concentrations of VOCs because of interference with oxygen uptake. In general, ambient VOC concentrations in the atmosphere are suspected to cause coughing, sneezing, headaches, weakness, laryngitis, and bronchitis, even at low concentrations. Some hydrocarbon components classified as VOC emissions are thought or known to be hazardous. Benzene, for example, one hydrocarbon component of VOC emissions, is known to be a human carcinogen.

Emissions: The quantity of pollutants released into the air, measured in pounds per day (ppd) or tons per day (tpd).

Toxic Air Contaminants (TACs): TACs, also referred to as hazardous air pollutants (HAPs), are generally defined as those contaminants that are known or suspected to cause serious health problems, but do not have a corresponding ambient air quality standard. TACs are also defined as an air pollutant that may increase a person's risk of developing cancer and/or other serious health effects; however, the emission of a toxic chemical does not automatically create a health hazard. Other factors, such as the amount of the chemical, its toxicity, how it is released into the air, the weather, and the terrain, all influence whether the emission could be hazardous to human health. Toxic air contaminants can result from manufacturing industries, automobile repair facilities, and diesel particulate emissions associated with heavy-duty equipment operations. TACs are emitted

by a variety of industrial processes such as petroleum refining, electric utility and chrome plating operations, commercial operations such as gasoline stations and dry cleaners, and motor vehicle exhaust and may exist as PM_{10} and $PM_{2.5}$ or as vapors (gases). TACs include metals, other particles, gases absorbed by particles, and certain vapors from fuels and other sources.

TACs increase the likelihood of health problems and can cause ecological impacts. The resultant health effects depend on the pollutant, exposure level, site conditions, and characteristics of the populations affected. Human exposure to these pollutants at sufficient concentrations and durations can result in cancer, poisoning, and rapid onset of sickness, such as nausea or difficulty in breathing. Other less measurable effects include immunological, neurological, reproductive, developmental, and respiratory problems. Pollutants deposited onto soil or into lakes and streams affect ecological systems and eventually human health through consumption of contaminated food. The carcinogenic potential of TACs is a particular public health concern because many scientists currently believe that there is no "safe" level of exposure to carcinogens. Any exposure to a carcinogen poses some risk of contracting cancer.

Controlling air toxic emissions became a national priority with the passage of the Clean Air Act Amendments (CAAA) of 1990, whereby Congress mandated that the EPA regulate 188 air toxics, also known as hazardous air pollutants. The EPA has assessed this expansive list in their rule in 2007 on the Control of Hazardous Air Pollutants from Mobile Sources,[5] and identified a group of 93 compounds emitted from mobile sources that are listed in their Integrated Risk Information System (IRIS).[6] In addition, EPA identified nine compounds with significant contributions from mobile sources that are among the national and regional-scale cancer risk drivers from their 2011 National Air Toxics Assessment (NATA).[7] These are acrolein, benzene, 1,3-butidiene, acetaldehyde, diesel particulate matter plus diesel exhaust organic gases (diesel PM), ethylbenzene, formaldehyde, naphthalene, and polycyclic organic matter.[8]

Air Dispersion: Air dispersion is defined as how air pollutants travel through ambient air. TACs/Mobile Source Air Toxics (MSATs) impact those located closest to the emission sources more than those located further away. A California law passed in 2003 (Public Resources Code Section 21151.8) prohibits the siting of a school within 500 feet of a freeway unless "the school district determines, through analysis based on appropriate air dispersion modeling, that the air quality at the proposed site is such that neither short-term nor long-term exposure poses significant health risks to pupils." The U.S. EPA has issued a number of regulations that will dramatically decrease MSATs through cleaner fuels and cleaner engines.

Diesel Particulate Matter (DPM): According to the CARB, most toxic air emissions are from motor vehicles and the particulate matter from the exhaust of diesel-fueled engines.[9] In 1998, the OEHHA completed a comprehensive health assessment of diesel exhaust. This assessment formed the basis for a decision by the

[5] Federal Register. February 26, 2007. 72(37): 8430.

[6] Environmental Protection Agency. August 2023. Integrated Risk Information System. https://www.epa.gov/iris

[7] Environmental Protection Agency. 2018. National Air Toxics Assessment. https://www.epa.gov/national-air-toxics-assessment

[8] Federal Highway Administration. January 2023. Memorandum. Information: Interim Guidance on Mobile Source Air Toxic Analysis in NEPA. https://www.fhwa.dot.gov/environment/air_quality/air_toxics/policy_and_guidance/msat/index.cfm

[9] California Air Resources Board. N.d. Reducing Toxic Air Pollutants in California's Communities. http://www.arb.ca.gov/toxics/brochure.pdf (accessed August 20, 2023).

CARB to formally identify particles in diesel exhaust as a TAC that may pose a threat to human health.[10] Diesel particulate matter is part of a complex mixture that makes up diesel exhaust. Diesel exhaust is commonly found throughout the environment and is estimated by EPA's National Scale Assessment to contribute to the human health risk in New England. Diesel exhaust is composed of two phases, either gas or particle, and both phases contribute to the risk. The gas phase is composed of many of the urban hazardous air pollutants, such as acetaldehyde, acrolein, benzene, 1,3-butadiene, formaldehyde, and polycyclic aromatic hydrocarbons.

The particle phase also has many different types of particles that can be classified by size or composition. The size of diesel particulates that are of greatest health concern are those that are in the categories of fine, and ultra-fine particles. The composition of these fine and ultrafine particles may be composed of elemental carbon with absorbed compounds such as organic compounds, sulfate, nitrate, metals, and other trace elements. Diesel exhaust is emitted from a broad range of diesel engines: the on-road diesel engines of trucks, buses, and cars and the off-road diesel engines that include locomotives, marine vessels, and heavy-duty equipment. People living and working in urban and industrial areas are more likely to be exposed to this pollutant. Those spending time on or near roads and freeways, truck loading and unloading operations, operating diesel-powered machinery, or working near diesel equipment face exposure to higher levels of diesel exhaust and face higher health risks.

3.1.2 Regulatory Framework

Federal

Federal Clean Air Act

Congress passed the first major Clean Air Act (CAA) in 1970 (42 U.S. Code [USC] Sections 7401 et seq.). This Act gives the EPA broad responsibility for regulating emissions from many sources of air pollution from mobile to stationary sources. Pursuant to the CAA, the EPA is authorized to regulate air emissions from mobile sources like heavy-duty trucks, agricultural and construction equipment, locomotives, lawn and garden equipment, and marine engines; and stationary sources such as power plants, industrial plants, and other facilities.

The CAA sets NAAQS for the six most common air pollutants to protect public health and public welfare. These pollutants include particulate matter, ozone, carbon monoxide, sulfur oxides, nitrogen oxides, and lead. For each pollutant, the EPA designates an area as attainment for meeting the standard or nonattainment for not meeting the standard. A maintenance designation entails an area that was previously designated as nonattainment but is currently designated as attainment. The CAA directs states to develop state implementation plans (SIPs) to achieve these standards.

National Ambient Air Quality Standards

The federal CAA required the EPA to establish NAAQS. The NAAQS set primary standards and secondary standards for specific air pollutants (**Table 3.1-3, *National Ambient Air Quality Standards***). Primary standards define limits for the intention of protecting public health, which include sensitive populations such

[10] Office of Environmental Health Hazard Assessment. N.d. Health Effects of Diesel Exhaust. http://oehha.ca.gov/public_info/facts/dieselfacts.html (accessed August 20, 2023).

as asthmatics, children, and the elderly. Secondary standards define limits to protect public welfare to include protection against decreased visibility, damage to animals, crops, vegetation, and buildings.

TABLE 3.1-3
NATIONAL AMBIENT AIR QUALITY STANDARDS

Pollutant		Primary/Secondary	Averaging Time	Level
Carbon monoxide		Primary	8 hours	9 ppm
			1 hour	35 ppm
Lead		Primary and secondary	Rolling 3-month average	0.15 µg/m^3
Nitrogen dioxide		Primary	1 hour	100 ppb
		Primary and secondary	Annual	53 ppb
Ozone		Primary and secondary	8 hours	0.070 ppm
Particulate matter	$PM_{2.5}$	Primary	Annual	12 µg/m^3
		Secondary	Annual	15 µg/m^3
		Primary and secondary	24 hours	35 µg/m^3
	PM_{10}	Primary and secondary	24 hours	150 µg/m^3
Sulfur dioxide		Primary	1 hour	75 ppb
		Secondary	3 hours	0.5 ppm

Note: ppm = parts per million by volume; µg/m^3 = micrograms per cubic meter; ppb = parts per billion by volume.
Source: California Air Resources Board. May 4, 2016. Ambient Air Quality Standards. http://www.arb.ca.gov/research/aaqs/aaqs2.pdf

State

California Clean Air Act of 1988

The California CAA of 1988 (CCAA) allows states to adopt ambient air quality standards and other regulations if they are at least as stringent as federal standards. CARB, as part of the California Environmental Protection Agency (Cal EPA), is responsible for the coordination and administration of both federal and state air pollution control programs within California, including setting the CAAQS. The CCAA, amended in 1992, requires all air quality management districts (AQMDs) in the state to achieve and maintain the CAAQS. The CAAQS are generally stricter than national standards for the same pollutants and has also established state standards for sulfates, hydrogen sulfide, vinyl chloride, and visibility-reducing particles, for which there are no national standards. CARB also conducts research, compiles emission inventories, develops suggested control measures, and provides oversight of local programs. CARB also has primary responsibility for the development of California's SIP, for which it works closely with the federal government and the local air districts.

California Ambient Air Quality Standards

The federal CAA permits states to adopt additional or more protective air quality standards if needed. California has set standards for certain pollutants, such as particulate matter and ozone, which are more protective of public health than respective federal standards (**Table 3.1-4, *California Ambient Air Quality Standards***). California has also set standards for some pollutants that are not addressed by federal standards.

State Implementation Plan / Air Quality Management Plans

An SIP is required by the EPA to ensure compliance with the NAAQS. States must develop a general plan to maintain air quality in areas of attainment and a specific plan to improve air quality for areas of nonattainment. SIPs are a compilation of new and previously submitted plans, programs (such as monitoring, modeling, permitting, etc.), district rules, state regulations, and federal controls. The SIP verifies that the state has a proper air quality management program that adheres to or strives to reach the most up to date emissions requirements. The 1990 amendments to the federal CAA set deadlines for attainment based on the severity of an area's air pollution problem. In adherence to CAA Section 172, states must adopt additional regulatory programs for nonattainment areas.[11]

Air Quality Management Plans (AQMPs), developed by the air districts, are required to ensure compliance with the state and federal requirements by demonstrating a pathway to achieving attainment for the criteria air pollutants. The CARB is the lead agency and responsible agency for submitting the SIP to the EPA. CARB forwards SIP revisions to the EPA for approval and publication in the *Federal Register*. The CFR Title 40, Chapter I, Part 52, Subpart F, Section 52.220, lists the items required to be included in the California SIP.[12]

[11] 42 U.S.C. §§ 7502 et seq. 172.

[12] Federal Register. May 31, 1972. 37:10850.

TABLE 3.1-4
CALIFORNIA AMBIENT AIR QUALITY STANDARDS

Pollutant		Averaging Time	Level
Carbon monoxide		8 hours	9 ppm
		1 hour	20 ppm
Lead		30-day average	1.5 µg/m^3
Nitrogen dioxide		1 hour	0.18 ppm
		Annual	0.03 ppm
Ozone		8 hours	0.07 ppm
		1 hour	0.09 ppm
Particulate matter	$PM_{2.5}$	Annual	12 µg/m^3
	PM_{10}	24 hours	50 µg/m^3
		Annual	20 µg/m^3
Sulfur dioxide		1 hour	0.25 ppm
		24 hours	0.04 ppm
Sulfates		24 hours	25 µg/m^3
Hydrogen sulfide		1 hour	0.03 ppm
Vinyl chloride		24 hours	0.01 ppm
Visibility reducing particles		Extinction coefficient of 0.23 per kilometer – visibility of 10 miles or more due to particle when relative humidity is less than 70 percent[13]	

Note: ppm = parts per million by volume; µg/m^3 = micrograms per cubic meter; ppb = parts per billion by volume.
Source: California Air Resources Board. May 4, 2016. Ambient Air Quality Standards. http://www.arb.ca.gov/research/aaqs/aaqs2.pdf

California Code of Regulations

The California Code of Regulations (CCR) is the official compilation and publication of regulations adopted, amended, or repealed by state agencies pursuant to the Administrative Procedure Act. The CCR includes regulations that pertain to air quality emissions. Section 2485 in Title 13 of the CCR states that the idling of all diesel-fueled commercial vehicles (weighing over 10,000 pounds) during construction shall be limited to five minutes at any location.

CARB Off-Road Regulation

In November 2022, CARB approved amendments to the In-Use Off-Road Diesel-Fueled Fleets Regulation (Off-Road Regulation) to further reduce emissions from the off-road sector by setting certification standards through new engine emissions control regulation and the development of zero-emission certification standards.[14]

[13] South Coast Air Quality Management District. February 2013. Final 2012 AQMP. http://www.aqmd.gov/home/library/clean-air-plans/air-quality-mgt-plan/final-2012-air-quality-management-plan

[14] California Air Resources Board. 2022. In-Use Off-Road Diesel-Fueled Fleets Regulation. https://ww2.arb.ca.gov/our-work/programs/use-road-diesel-fueled-fleets-regulation.

Regional

South Coast Air Quality Management District

The SCAQMD is primarily responsible for planning, implementing, and enforcing air quality standards for the SCAB. The SCAB is a subregion within the western portion of the SCAQMD jurisdiction. The potential air quality impacts occurring during the construction and operation of the proposed project were evaluated using the CEQA Guidelines and the quantitative thresholds of significance established by the SCAQMD (**Table 3.1-5, *SCAQMD Air Quality Significance Thresholds***). The 2022 SCAQMD AQMP provides the applicable rules and regulations to ensure compliance with all federal and state ambient air quality standards for the areas under the SCAQMD jurisdiction.[15]

2022 Air Quality Management Plan

To meet the NAAQS and CAAQS, the SCAQMD has adopted a series of AQMPs, which serve as a regional blueprint to develop and implement an emission reduction strategy that will bring the area into attainment with the standards in a timely manner. The most significant air quality challenge in the Air Basin is to reduce nitrous oxide (NO_X) emissions sufficiently to meet the upcoming O_3 standard deadlines, as NO_X plays a critical role in the creation of O_3. NO_X emissions also lead to the formation of $PM_{2.5}$, which requires NO_X reductions to meet the O_3 standards, resulting in an improvement of $PM_{2.5}$ levels and attainment of standards. Meeting the 2015 federal ozone standard requires reducing NO_X emissions by 67 percent more than is required by adopted rules and regulations in 2037. The 2022 AQMP, in addition to federal action to regulate mobile sources, requires substantial reliance on future deployment of advanced technologies to meet the standard, requiring more expensive control strategies to meet federal standards.

The main source of NO_X emissions within SCAQMD is from heavy-duty trucks, ships, and other State and federally regulated mobile sources. The 2022 AQMP includes strategies to achieve the required NO_x reductions through the extensive use of zero emission technologies across all stationary and mobile sources. The 2022 AQMP's goal is to transition to zero and low emission technologies in an equitable and affordable way and incorporate transportation strategies and control measures provided in the Southern California Association of Governments' (SCAG) 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), referred to as Connect SoCal. The 2022 AQMP includes additional strategies including regulation, accelerated deployment of available cleaner technologies (e.g., zero emissions technologies, cost-effective and feasible technologies, and low NO_x technologies in other applications), best management practices (BMP), co-benefits from existing programs (e.g., climate and energy efficiency), incentives, and other CAA measures to achieve the 2015 8-hour ozone standard.

[15] South Coast Air Quality Management District. December 2022. 2022 Air Quality Management Plan. http://www.aqmd.gov/home/air-quality/clean-air-plans/air-quality-mgt-plan

TABLE 3.1-5
SCAQMD AIR QUALITY SIGNIFICANCE THRESHOLDS

Mass Daily Thresholds		
Pollutant	**Construction**	**Operation**
NO_x	100 lbs/day	55 lbs/day
VOC	75 lbs/day	55 lbs/day
PM_{10}	150 lbs/day	150 lbs/day
$PM_{2.5}$	55 lbs/day	55 lbs/day
SO_x	150 lbs/day	150 lbs/day
CO	550 lbs/day	550 lbs/day
Lead	3 lbs/day	3 lbs/day
Toxic Air Contaminants (TACs), Odor, and GHG Thresholds		
TACs (including carcinogens and noncarcinogens)	Maximum Incremental Cancer Risk ≥ 10 in 1 million Cancer Burden > 0.5 excess cancer cases (in areas ≥ 1 in 1 million) Chronic & Acute Hazard Index ≥ 1.0 (project increment)	
Odor	Project creates an odor nuisance pursuant to SCAQMD Rule 402	
GHG	10,000 MT/yr CO_2eq for industrial facilities	
Ambient Air Quality Standards for Criteria Pollutants[a]		
NO_2 1-hour average Annual arithmetic mean	SCAQMD is in attainment; project is significant if it causes or contributes to an exceedance of the following attainment standards: 0.18 ppm (state) 0.03 ppm (state) and 0.0534 ppm (federal)	
PM_{10} 24-hour average Annual average	 10.4 µg/m^3 (construction)[b] & 2.5 µg/m^3 (operation) 1.0 µg/m^3	
$PM_{2.5}$ 24-hour average	 10.4 µg/m^3 (construction)[b] & 2.5 µg/m^3 (operation)	
SO_2 1-hour average 24-hour average	 0.25 ppm (state) & 0.075 ppm (federal – 99th percentile) 0.04 ppm (state)	
Sulfate 24-hour average	25 µg/m^3 (state)	
CO 1-hour average 8-hour average	SCAQMD is in attainment; project is significant if it causes or contributes to an exceedance of the following attainment standards: 20 ppm (state) and 35 ppm (federal) 9.0 ppm (state/federal)	
Lead 30-day average Rolling 3-month average	 1.5 µg/m^3 (state) 0.15 µg/m^3 (federal)	

Note: lbs/day = pounds per day; ppm = parts per million; µg/m^3 = micrograms per cubic meter; MT/year CO_2eq = metric tons per year of CO_2 equivalents; NO_x = nitrogen oxide; VOC = volatile organic compounds; PM_{10} = particulate matter 10 microns or less in diameter (coarse PM); $PM_{2.5}$ = particulate matter 2.5 microns or less in diameter (fine PM); SO_X = sulfates; CO = carbon monoxide; TACs = toxic air contaminants; GHG = greenhouse gases; NO_2 = nitrogen dioxide; SO_2 = sulfur dioxide.

[a] Ambient air quality thresholds for criteria pollutants based on SCAQMD Rule 1303, Table A-2 unless otherwise stated.

[b] Ambient air quality threshold based on SCAQMD Rule 403.

Source: South Coast Air Quality Management District. 2022. 2022 Air Quality Management Plan (AQMP).

SCAG Connect SoCal

SCAG is a Joint Powers Agency established, pursuant to California Government Code Section 6502 et seq., to maintain a continuing, cooperative, and comprehensive transportation planning. Through the implementation of transportation and land use strategies, Connect SoCal outlines how the region can achieve the state's GHG reduction goals and federal CAA requirements. Connect SoCal provides transportation strategies and technologies to improve the regional transportation network, prioritizes the use of streets and curb space for pedestrian access and alternative transportation modes rather than vehicles. When implementing transportation projects, the plan encourages coordination with land use planning to develop housing and employment opportunities closer to each other and to public transit. The plan also includes a financial analysis considering costs for operations and maintenance (O&M) of the existing transportation system's reliability, longevity, resilience, and cost effectiveness.

SCAQMD Rules and Regulations

The SCAQMD has adopted several rules and regulations to regulate sources of air pollution in the Air Basin and to help achieve air quality standards for projects, which include, but are not limited to the following:[16]

- **Rule 401 – Visible Emissions:** states that a person shall not discharge into the atmosphere from any single source of emission any air contaminant for a period or periods aggregating more than three minutes in any one hour which is as dark or darker in shade, designated No. 1 on the Ringelmann Chart or of such opacity.

- **Rule 402 – Nuisance:** a person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property.

- **Rule 403 – Fugitive Dust:** requires projects to prevent, reduce or mitigate fugitive dust emissions from a site. Rule 403 restricts visible fugitive dust to the project property line, restricts the net PM_{10} emissions to less than 50 micrograms per cubic meter ($\mu g/m^3$) and restricts the tracking out of bulk materials onto public roads. Project shall utilize one or more of the best available control measures provided. Mitigation measures may include adding freeboard to haul vehicles; fugitive dust management using chemical stabilizers or frequent watering to unpaved areas; covering loose material on haul vehicles; and/or ceasing all activities.

- **Rule 1401 – New Source Review of Toxic Air Contaminants:** specifies limits for maximum individual cancer risk (MICR), cancer burden, and noncancer acute and chronic hazard index (HI) from new permit units, relocations, or modifications to existing permit units which emit toxic air contaminants.

[16] South Coast Air Quality Management District. N.d. South Coast AQMD Rule Book. http://www.aqmd.gov/home/rules-compliance/rules/scaqmd-rule-book/regulation (accessed May 2023).

SCAQMD Air Quality Guidance Documents

The SCAQMD published the *CEQA Air Quality Handbook,* approved by the AQMD Governing Board in 1993, to provide local governments with guidance for analyzing and mitigating project-specific air quality impacts.[17] The *CEQA Air Quality Handbook* provides standards, methodologies, and procedures for conducting air quality analyses. South Coast AQMD is in the process of developing an "Air Quality Analysis Guidance Handbook" (Handbook) to replace existing analysis guidance documentation.

Local

City of Los Angeles General Plan Air Quality Element

The City is responsible for the implementation of transportation control measures as outlined in the AQMP. Through capital improvement programs, the City can fund infrastructure that contributes to improved air quality by requiring such improvements as bus turnouts as appropriate, installation of energy-efficient streetlights, and synchronization of traffic signals. In accordance with CEQA requirements and the CEQA review process, the City assesses the air quality impacts of new development projects, requires mitigation of significant air quality impacts by conditioning discretionary permits, and monitors and enforces implementation of such mitigation measures.

The Air Quality Element establishes six goals:[18]

- Good air quality in an environment of continued population growth and healthy economic structure;
- Less reliance on single-occupant vehicles with fewer commute and non-work trips;
- Efficient management of transportation facilities and system infrastructure using cost-effective system management and innovative demand-management techniques;
- Minimal impacts of existing land use patterns and future land use development on air quality by addressing the relationship between land use, transportation and air quality;
- Energy efficiency through land use and transportation planning, the use of renewable resources and less-polluting fuels and the implementation of conservation measures including passive measures such as site orientation and tree planting; and
- Citizen awareness of the linkages between personal behavior and air pollution and participation in efforts to reduce air pollution.

[17] South Coast Air Quality Management District. 1993. CEQA Air Quality Handbook 1993. http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/ceqa-air-quality-handbook

[18] City of Los Angeles Department of City Planning. Adopted November 24, 1992. City of Los Angeles General Plan, Air Quality Element. https://planning.lacity.org/odocument/0ff9a9b0-0adf-49b4-8e07-0c16feea70bc/Air_Quality_Element.pdf

Los Angeles Unified School District Subsequent Program EIR

The 2023 SPEIR includes Standard Conditions of Approval (SCs) for reducing impacts on air quality in areas where future projects would be implemented under the SUP. Applicable SCs related to Project air quality impacts are provided in **Table 3.1-6 *Air Quality Standard Conditions of Approval***, below.

According to the 2023 SPEIR, projects implemented under the SUP are anticipated to have less than significant and significant impacts on air quality within the LAUSD service area.[19] However, the Project-specific analysis provided below concludes that implementation of the proposed Project would have less-than-significant impacts on the surrounding community during construction and significant and unavoidable impacts with respect to localized operational impacts.

TABLE 3.1-6
AIR QUALITY STANDARD CONDITIONS OF APPROVAL

Applicable SC	Description
SC-AQ-1	LAUSD shall complete a Health Risk Assessment for new campus locations that would place classrooms or play areas within close proximity (less than 0.25 mile) of existing sources of adverse emissions. LAUSD shall identify all permitted and non-permitted stationary sources, freeways and other busy traffic corridors, railyards, and large agricultural operations within 0.25 mile of the project. Once identified, make a determination about the need for qualitative evaluation, screening level evaluation in accordance with air district specific guidance and tools, or a refined evaluation with air dispersion modeling, to determine the if risks constitute an actual or potential endangerment of public health to persons who would attend or be employed at the school. For freeways and other busy traffic corridors within 500 feet, air dispersion modeling must be used to make the health risk determination (no screening, no qualitative discussion, etc.). The Health Risk Assessment shall comply with '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. The HRA must find that health risks are below criteria thresholds. If health risks which exceed air district criteria thresholds are identified, the school campus shall be redesigned or relocated to a site farther from the emissions generator.
SC-AQ 2	Construction Contractor shall ensure that construction equipment is properly tuned and maintained in accordance with manufacturer's specifications, to ensure excessive emissions are not generated by unmaintained equipment.
SC-AQ 3	Construction Contractor shall: • Maintain speeds of 15 miles per hour (mph) or less with all vehicles. • Load impacted soil directly into transportation trucks to minimize soil handling. • Water/mist soil as it is being excavated and loaded onto the transportation trucks. • Water/mist and/or apply surfactants to soil placed in transportation trucks prior to exiting the site. • Minimize soil drop height into haul trucks or stockpiles during dumping. • During transport, cover or enclose trucks transporting soils, increase freeboard requirements, and repair trucks exhibiting spillage due to leaks.

[19] Los Angeles Unified School District. 2023. Subsequent Program EIR for the School Upgrade Program. http://achieve.lausd.net/ceqa

TABLE 3.1-6
AIR QUALITY STANDARD CONDITIONS OF APPROVAL

Applicable SC	Description
	• 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 analyze air quality impacts: If site-specific review or monitoring data of a school construction project identifies potentially significant adverse regional and localized construction air quality impacts, then LAUSD shall implement all feasible measures to reduce air emissions below the South Coast Air Quality Management District's (SCAQMD) regional and localized significance thresholds. Construction bid contracts shall include protocols that reduce construction emissions during high-emission construction phases from vehicles and other fuel driven construction engines, activities that generate fugitive dust, and surface coating operations. The Construction Contractor shall be responsible for documenting compliance with the identified protocols. Specific air emission reduction protocols include, but are not limited to, the following. <u>Exhaust Emissions</u> • Schedule construction activities that affect traffic flow to off-peak hours (e.g. between 10:00 AM and 3:00 PM). • Consolidate truck deliveries and limit the number of haul trips per day. • Route construction trucks off congested streets, as permitted by local jurisdiction haul routes. • Employ high pressure fuel injection systems or engine timing retardation. • Use ultra-low sulfur diesel fuel, containing 15 ppm sulfur or less (ULSD) in all diesel construction equipment. • Use construction equipment rated by the United States Environmental Protection Agency as having at least Tier 4 (model year 2008 or newest available model) emission limits for engines between 50 and 750 horsepower. • Restrict non-essential diesel engine idle time, to not more than five consecutive minutes. • Use electrical power rather than internal combustion engine power generators. • Use electric or alternatively fueled equipment, as feasible. • Use construction equipment with the minimum practical engine size. • Use low-emission on-road construction fleet vehicles. • Ensure construction equipment is properly serviced and maintained to the manufacturer's standards. <u>Fugitive Dust</u> • Apply non-toxic soil stabilizers according to manufacturers' specification to all inactive construction areas (previously graded areas inactive for 10 days or more). • Replace ground cover in disturbed areas as quickly as possible. • Sweep streets at the end of the day if visible soil material is carried onto adjacent public paved roads (recommend water sweepers with reclaimed water). • Install wheel washers where vehicles enter and exit unpaved roads onto paved roads, or wash off trucks and any equipment leaving the site each trip. • Pave unimproved construction roads that have a traffic volume of more than 50 daily trips by construction equipment, and/or 150 daily trips for all vehicles. • Pave all unimproved construction access roads for at least 100 feet from the main road to the project site. • Enclose, cover, water twice daily, or apply non-toxic soil binders according to manufacturers' specifications to exposed piles (i.e., gravel, dirt, and sand) with a 5% or greater silt content. • Suspend all excavating and grading operations when wind speeds (as instantaneous gusts) exceed 25 miles per hour (mph).

TABLE 3.1-6
AIR QUALITY STANDARD CONDITIONS OF APPROVAL

Applicable SC	Description
	• Water disturbed areas of the active construction and unpaved road surfaces at least three times daily, except during periods of rainfall. • Limit traffic speeds on unpaved roads to 15 mph or less. • Prohibit fugitive dust activities on days where violations of the ambient air quality standard have been forecast by SCAQMD. • Tarp and/or maintain a minimum of 24 inches of freeboard on trucks hauling dirt, sand, soil, or other loose materials. • Limit the amount of daily soil and/or demolition debris loaded and hauled per day. General Construction • Use ultra-low VOC or zero-VOC surface coatings. • Phase construction activities to minimize maximum daily emissions. • Configure construction parking to minimize traffic interference. • Provide temporary traffic control during construction activities to improve traffic flow (e.g., flag person). • Prepare and implement a trip reduction plan for construction employees. • Implement a shuttle service to and from retail services and food establishments during lunch hours. • Increase distance between emission sources to reduce near-field emission impacts.

3.1.3 Thresholds of Significance

Pursuant to Appendix G of the CEQA *Guidelines,* the Project would result in a significant impact related to air quality if it would:

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

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

c) Expose sensitive receptors to substantial pollutant concentrations?

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

Pursuant to CEQA Guidelines (Section 15064.7), a lead agency may consider using, when available, the significance criteria established by the applicable air quality management district or air pollution control district when making determinations of significance. The Project would be under the SCAQMD's jurisdiction. SCAQMD has established air quality significance criteria in its CEQA Air Quality Handbook. These criteria are based on the recognition that the Air Basin is a distinct geographic area with a critical air pollution problem for which ambient air quality standards have been promulgated to protect public health.[20] The air quality

[20] South Coast Air Quality Management District. November 1993. CEQA Air Quality Handbook. http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/ceqa-air-quality-handbook-(1993)

impacts of the Project are, therefore, evaluated according to the most recent criteria adopted by the SCAQMD in connection with its CEQA Air Quality Handbook, Air Quality Analysis Guidance Handbook, and subsequent SCAQMD guidance as discussed previously.

Construction Emissions

The SCAQMD has established numerical emission indicators of significance for construction. The numerical emission indicators are based on the recognition that the Air Basin is a distinct geographic area with a critical air pollution problem for which ambient air quality standards have been promulgated to protect public health.[21] Given that construction impacts are temporary and limited to the construction phase, the SCAQMD has established numerical indicators of significance specific to construction activity. Based on the indicators in the SCAQMD CEQA Air Quality Handbook, the Project would cause or contribute to an exceedance of an ambient air quality standard if the following would occur:

Regional construction emissions from both direct and indirect sources would exceed any of the following SCAQMD prescribed daily regional emissions criteria:[22]

- 75 pounds a day for VOC;
- 100 pounds per day for NO_X;
- 550 pounds per day for CO;
- 150 pounds per day for SO_2;
- 150 pounds per day for PM_{10}; or
- 55 pounds per day for $PM_{2.5}$.

In addition, the SCAQMD has developed a methodology to assess the potential for localized emissions to cause an exceedance of applicable ambient air quality standards. Impacts would be considered significant if the following were to occur:

- Maximum daily localized emissions of NO_X and/or CO during operation are greater than the applicable localized significance thresholds, resulting in predicted ambient concentrations in the vicinity of the Project site greater than the most stringent ambient air quality standards for NO_2 and/or CO.[23]

- Maximum daily localized emissions of PM_{10} and/or $PM_{2.5}$ during operation are greater than the applicable localized significance thresholds, resulting in predicted ambient concentrations in the

[21] South Coast Air Quality Management District. November 1993. CEQA Air Quality Handbook. http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/ceqa-air-quality-handbook-(1993)

[22] South Coast Air Quality Management District. March 2023. South Coast Air Quality Significance Thresholds. https://www.aqmd.gov/docs/default-source/ceqa/handbook/south-coast-aqmd-air-quality-significance-thresholds.pdf?sfvrsn=25

[23] South Coast Air Quality Management District. July 2008. Final Localized Significance Threshold Methodology. http://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/final-lst-methodology-document.pdf?sfvrsn=2

vicinity of the Project site to exceed 10.4 μg/m^3 over 24 hours (SCAQMD Rule 403 control requirement).[24]

As discussed in detail in Section 3.1-4, *Methodology,* the SCAQMD has established screening criteria that can be used to determine the maximum allowable daily emissions that would satisfy the localized significance thresholds, and, therefore, not cause, or contribute to, an exceedance of the applicable ambient air quality standards, or ambient concentration limits without Project-specific dispersion modeling. This analysis uses the screening criteria to evaluate impacts from localized emissions for a 2-acre site located within 25 meters from a sensitive receptor in the Central Los Angeles County Monitoring Area:

- 108 pounds per day for NO_x;
- 1,048 pounds per day for CO;
- 8 pounds per day for PM_{10}; or
- 5 pounds per day for $PM_{2.5}$.

Carbon Monoxide Hotspots

With respect to the formation of CO hotspots, the Project would be considered significant if the following would occur:

- The project would cause, or contribute to, an exceedance of the CAAQS 1-hour or 8-hour CO standard of 20 or 9.0 ppm, respectively.

Toxic Air Contaminants

Based on criteria set forth by the SCAQMD, the project would expose sensitive receptors to substantial concentrations of toxic air contaminants if any of the following were to occur:[25]

- The Project would emit carcinogenic materials or TACs that exceed the maximum incremental cancer risk of ten in one million or a cancer burden greater than 0.5 excess cancer cases (in areas greater than or equal to 1 in 1 million) or an acute or chronic hazard index of 1.0.

Cumulative Impacts

The SCAQMD has provided guidance on an acceptable approach to addressing cumulative impacts for air quality as discussed in the SCAQMD's White Paper on Potential Control Strategies to Address Cumulative Impacts from Air Pollution:[26]

[24] South Coast Air Quality Management District. March 2023. Air Quality Significance Thresholds. http://www.aqmd.gov/docs/default-source/ceqa/handbook/south-coast-aqmd-air-quality-significance-thresholds.pdf?sfvrsn=25

[25] South Coast Air Quality Management District. November 1993. CEQA Air Quality Handbook. https://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/ceqa-air-quality-handbook-(1993)

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

> *As Lead Agency, the AQMD uses the same significance thresholds for project specific and cumulative impacts for all environmental topics analyzed in an Environmental Assessment or EIR... Projects that exceed the Project-specific significance thresholds are considered by the SCAQMD to be cumulatively considerable. This is the reason project-specific and cumulative significance thresholds are the same. Conversely, projects that do not exceed the project-specific thresholds are generally not considered to be cumulatively significant.*

Based on SCAQMD guidance, individual construction projects that exceed the SCAQMD's recommended daily thresholds for project-specific impacts would also cause a cumulatively considerable increase in emissions for those pollutants for which the Air Basin is in non-attainment. The cumulative analysis of air quality impacts within this Draft EIR follows SCAQMD's guidance such that construction or operational Project emissions will be considered cumulatively considerable if Project-specific emissions exceed an applicable SCAQMD recommended significance threshold.

3.1.4 Methodology

Consistency with Air Quality Plan

Section 15125 of the State CEQA Guidelines requires an analysis of project consistency with applicable governmental plans and policies. In accordance with the SCAQMD's CEQA Air Quality Handbook, the following criteria were used to assess the proposed Project's consistency with the SCAQMD's 2022 AQMP and the City's General Plan Air Quality Element:

- Criterion 1: Will the proposed Project result in any of the following:
    - An increase in the frequency or severity of existing air quality violations; or
    - Cause or contribute to new air quality violations; or
    - Delay timely attainment of air quality standards or the interim emissions reductions specified in the AQMP.
- Criterion 2: Will the proposed Project exceed the assumptions utilized in preparing the AQMP?
    - Is the Proposed project consistent with the population and employment growth projections upon which AQMP forecasted emission levels are based;
    - Does the proposed Project include air quality mitigation measures; or
    - To what extent is the proposed Project development consistent with the AQMP control measures?

The SCAQMD is required, pursuant to the CAA, to reduce emissions of criteria pollutants for which the Air Basin is in non-attainment of the NAAQS (e.g., O3 and $PM_{2.5}$). The SCAQMD's AQMP contains a comprehensive list of pollution control strategies directed at reducing emissions and achieving the NAAQS. These strategies are developed, in part, based on regional growth projections prepared by the SCAG. As part of its air quality planning, SCAG has prepared the Regional Comprehensive Plan and Guide and the RTP/SCS, which provide the basis for the land use and transportation components of the AQMP and are used in the preparation of the air quality forecasts and the consistency analysis included in the AQMP. Both the Regional Comprehensive Plan and AQMP are based, in part, on projections originating with county and city general plans.

The 2022 AQMP builds off previously prepared AQMPs to accommodate growth, reduce the high levels of pollutants within the areas under the jurisdiction of SCAQMD, return clean air to the region, and minimize the impact on the economy. Projects that are consistent with the assumptions used in the AQMP do not interfere with attainment because the growth is included in the projections utilized in the formulation of the AQMP. Thus, projects, uses, and activities that are consistent with the applicable growth projections and control strategies used in the development of the AQMP would not jeopardize attainment of the air quality levels identified in the AQMP, even if they exceed the SCAQMD's numerical indicators.

Construction Emissions

Construction of the proposed Project could generate temporary criteria pollutant emissions through the use of heavy-duty construction equipment, such as excavators and forklifts, and through vehicle trips generated from worker trips and haul trucks traveling to, and from, the Project site. In addition, fugitive dust emissions would result from demolition and various soil-handling activities. Mobile source emissions, primarily NO_X, would result from the use of construction equipment such as dozers and loaders. Construction emissions can vary substantially from day to day, depending on the level of activity, the specific type of construction activity, and prevailing weather conditions. The assessment of construction air quality impacts considers each of these potential sources.

Daily regional emissions during construction are forecasted by assuming conservative construction activities (i.e., assuming all construction occurs at the earliest feasible date) and applying the mobile source and fugitive dust emissions factors. The emissions are estimated using the CalEEMod (Version 2022.1.1.20) software, an emissions inventory software program recommended by the SCAQMD. CalEEMod is based on outputs from OFFROAD and EMFAC, which are emissions estimation models developed by CARB and used to calculate emissions from construction activities, including on-and off-road vehicles. Default CalEEMod inputs were used for the modeling unless Project specific details were available to adjust the Project input values based on construction equipment and schedule information from similar land use development projects in the LAUSD. These values were then applied to the construction phasing assumptions used in the criteria pollutant analysis to generate criteria pollutant emissions values for each construction activity. Detailed construction equipment lists, construction scheduling, and emissions calculations are provided in Appendix 6 of this Draft EIR.

Construction of the proposed Project was assumed to begin in Q1 of 2026. Construction may commence at a later date than that analyzed in this air quality impact analysis. If construction is delayed, LAUSD SCs referenced in Table 3.1-6 would be applied, and impacts to air quality during construction would not increase compared to those analyzed herein. Sub-phases of construction would include demolition, site preparation, grading, building construction, paving, and architectural coating. Emissions from these activities are estimated for the duration of construction for the proposed Project. The maximum daily emissions are predicted values for the worst-case day and do not necessarily represent the emissions that would occur for every day of Project construction. The maximum daily emissions are compared to the SCAQMD daily regional numeric indicators.

Operational Emissions

With respect to SUP modernization projects, the 2023 SPEIR states that operational activities would be less than significant, as these projects would not increase capacity to existing schools, and net Project emissions

would be minimal. Additionally, overall District enrollment is forecast to decrease over the next 10 years, and operational emissions are not expected to increase in the long-term.[27]

The proposed Project would replace and upgrade facilities on the Irving MS Campus, but it would not increase the number of students, or faculty, at the school and would not introduce major new emission sources. No new vehicle trips would be generated, and there would be no increase in mobile source emissions. Implementation of regulatory compliance measures such as Rule 403 (Fugitive Dust) and Rule 1113 from the SCAQMD would help keep emissions below SCAQMD thresholds. Furthermore, the proposed Project would be required to abide by CalGreen mandatory guidelines. The proposed Project's modernization initiative would facilitate building upgrades and the replacement of old, energy-inefficient structures with those that use less energy and reduce emissions from space heating and other onsite sources to meet the most current Title 24 building energy standards. Therefore, there would be no net increase in regional operational emissions of any criteria pollutant, and the impact would be less than significant. Additionally, the District is required to comply with all applicable SCs, and would implement SC-AQ-4 to further reduce Project-related operational impacts. Therefore, operational emissions on a regional scale are not discussed further in this document.

Localized Emissions

The localized effects from the on-site portion of the construction and operation emissions are evaluated at nearby sensitive receptor locations potentially impacted by the proposed project according to the SCAQMD's Localized Significance Threshold Methodology, which relies on onsite mass emission rate screening tables and Project-specific dispersion modeling, where appropriate. The localized significance thresholds are only applicable to NO_X, CO, PM_{10}, and $PM_{2.5}$. The SCAQMD has established screening criteria that can be used to determine the maximum allowable daily emissions that would satisfy the localized significance thresholds and, therefore, would not cause, or contribute to, an exceedance of the applicable ambient air quality standards without Project-specific dispersion modeling. The screening criteria depend on (1) the area in which the Project is located, (2) the size of the Project site, and (3) the distance between the Project site and the nearest sensitive receptor (e.g., residences, schools, hospitals). The Project site is located in the Central Los Angeles County area, and no greater than approximately 2 acres would be worked on at a time. The nearest sensitive receptors would be the students onsite at Irving MS during construction of the Project and residences adjacent to the Project site. Therefore, to ensure a conservative analysis, the screening criteria was applied to a 2-acre site in Central Los Angeles County with a 25-meter receptor distance. According to the SCAQMD, projects with boundaries located closer than 25 meters to the nearest receptor should use the local significance thresholds (LSTs) for receptors located at 25 meters.[28]

[27] Los Angeles Unified School District. 2023. Subsequent Program EIR for the School Upgrade Program. http://achieve.lausd.net/ceqa.

[28] South Coast Air Quality Management District. July 2008. Final Localized Significance Threshold Methodology. https://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/final-lst-methodology-document.pdf?sfvrsn=2

Carbon Monoxide Hotspots

Emissions of CO are produced in greatest quantities from motor vehicle combustion and are usually concentrated at, or near, ground level because they do not readily disperse into the atmosphere, particularly under cool, stable (i.e., low or no wind) atmospheric conditions. Localized areas where ambient concentrations exceed state and/or federal standards are termed CO hotspots. The potential for the Project to cause, or contribute to, the formation of offsite CO hotspots is evaluated based on prior dispersion modeling conducted by SCAQMD in the Los Angeles area, as discussed in the 2023 SPEIR. The 2023 SPEIR states that a project would have to increase traffic volumes at a single intersection by more than 44,000 vehicles per hour—or 24,000 vehicles per hour where vertical and/or horizontal air do not mix-in order to generate a significant CO impact.

The proposed Project would replace, or upgrade, facilities on the Irving MS Campus, but it would not increase the number of students, or faculty, at the high school, and would not introduce major new emission sources. No new operational vehicle trips would be generated, and there would be no increase in mobile source CO emissions. The proposed Project will result in a reduction of standard classrooms and student attendance at LAUSD schools is projected to decline over the next 10 years.[29] The operational emissions from the proposed project, including natural gas and landscaping, would not be high enough to produce a CO hotspot. CO concentrations in the State of California and SCAB have gradually declined based on the transition to cleaner fuels, turnover of older vehicles, and implementation of control technology on industrial facilities. Therefore, CO Hotspots are not discussed further in this document.

Toxic Air Contaminants

The greatest potential for TAC emissions during construction would be related to the release of diesel particulate emissions associated with heavy-duty equipment during demolition, excavation, and grading activities. Construction activities associated with the Project would be sporadic, transitory, and short-term in nature. During long-term operations, TACs could be emitted as part of periodic maintenance operations, cleaning, painting, etc., and from periodic visits from delivery trucks and service vehicles. However, these uses are expected to be occasional and result in minimal exposure to offsite sensitive receptors. The potential for the Project to result in significant health risk impacts are evaluated based on guidance provided in the 2023 SPEIR.

[29] Los Angeles Unified School District. 2023. Subsequent Program EIR for the School Upgrade Program. http://achieve.lausd.net/ceqa.

3.1.5 Impact Analysis

Air Quality Plan

Impact 3.2-1: The Project would not conflict with, or obstruct, implementation of the applicable air quality plan.

SCAQMD CEQA Air Quality Handbook Policy Analysis

The proposed Project's impacts with respect to consistency with the applicable air quality plan are discussed in regard to the SCAQMD's 2022 AQMP. The two evaluation criteria (as discussed in Section 3.1.7) are evaluated in the following sections:

a) Criteria 1 – Increase the Frequency or Severity of Violations

The proposed Project type is consistent with a modernization, repair, replacement, upgrade, remodel, renovation, and installation initiative as discussed in Section 4.6.2.1 of the 2023 SPEIR. The proposed Project would advance regional goals to reduce vehicle miles traveled (VMT) as LAUSD student attendance is anticipated to decrease over the next 10 years. Additionally, the proposed Project would decrease the number of student classrooms from 65 to 46, which can decrease regional VMT and mobile air pollutant emissions. As shown below, the proposed Project would not exceed SCAQMD LST threshold for air quality emissions during construction. AQMP and Connect SoCal goals to reduce VMT and vehicle emissions would be advanced by the proposed Project. The proposed Project site is located in an area served by public transportation service provided by LA Metro, which operates Bus Line 182 along Fletcher Drive with two bus stops nearby: Fletcher Drive/West Avenue 32 (0.3 mile southwest) and Fletcher Drive/Estara Avenue (0.1 mile northwest). Additionally, LAUSD encourages ride-sharing programs for students and teachers, including riding bikes to school (see Section 3.7, *Transportation and Traffic*).

As demonstrated in **Table 3.1-8** below, emissions resulting from short-term construction impacts will not exceed the SCAQMD regional and local significance thresholds for construction. As referenced in Section 3.1.7, emissions resulting in long-term operational activities are not expected to increase in the long-term. Therefore, as emissions from the proposed Project would not exceed the SCAQMD regional thresholds, the proposed Project would not contribute to the exceedance of any air pollutant concentration standards, cause or contribute to new air quality violations, or delay timely attainment of air quality standards or the interim emission reductions stated in the AQMP. The proposed Project is found to be consistent with the AQMP for the first criterion.

b) Criteria 2 – Exceed Assumptions in the AQMP?

The projections in the 2022 AQMP for achieving air quality goals are based on assumptions in SCAG's Connect SoCal regarding population, housing, and growth trends. This criterion is assessed with the emphasis of ensuring that the proposed Project does not deviate from the 2022 AQMP forecasts. Connect SoCal includes chapters on the challenges in a changing region, creating a plan for our future, and the road to greater mobility and sustainable growth. These contexts directly respond to the state and federal requirements placed on SCAG. Local governments are mandated to use these requirements to maintain consistency with their plans and

applicable regional plans under CEQA. The proposed Project is under the jurisdiction of the City of Los Angeles, and thus the Land Use plan for the City defines the assumptions represented in the AQMP.

a. Is the proposed Project consistent with the population, housing, and employment growth projections upon which AQMP forecasted emission levels are based?

A project is consistent with the AQMP if it is consistent with the population, housing and employment assumptions that were used in the development of the AQMP. Neither the proposed Project nor the SUP is a large, regionally significant project that would affect the regional growth projections made by the SCAG and used by the SCAQMD in formulating its AQMP. The student and faculty population at the school would not increase as a result of the proposed Project. Under this criterion, the SCAQMD recommends that lead agencies demonstrate that a project would not directly obstruct implementation of an applicable air quality plan and that a project be consistent with the assumptions (typically land-use related, such as resultant employment or residential units) upon which the air quality plan is based. Being relatively small in number and temporary in nature, construction jobs under the Project would not conflict with the long-term employment projections upon which the AQMP is based.

b. To what extent is project development consistent with the control measures set forth in the AQMP?

Control strategies in the AQMP with potential applicability to short-term emissions from construction activities include strategies denoted in the AQMP as MOB-08 and MOB-10, which are intended to reduce emissions from on-road and off-road heavy-duty vehicles and equipment by accelerating replacement of older, emissions-prone engines with newer engines meeting more stringent emission standards. The Project would not conflict with implementation of these strategies as the construction contractor hired would comply with the current requirements for fleet emissions. Additionally, the Project would comply with CARB requirements to minimize short-term emissions from on-road and off-road diesel equipment. The Project would also comply with SCAQMD regulations for controlling fugitive dust pursuant to SCAQMD Rule 403 and implement SC-AQ-2, SC-AQ-3, and SC-AQ-4. SC-AQ-2 would obligate construction contractors to have off-road equipment properly tuned and maintained in accordance with the manufacturer's specifications. SC-AQ-3 would implement methods for reducing onsite dust emissions during soil removal. These methods would include maintaining slow speeds for vehicles, applying water/mist to dirt as it is loaded and unloaded, minimizing soil drop heights, covering haul truck loads, and using polyethylene sheeting to cover excavated areas and dirt stockpiles. SC-AQ-4 is intended to reduce construction exhaust and fugitive dust emissions with a number of features, including, but not limited to, restricting diesel engine idling times to no more than five consecutive minutes, utilizing ultra-low sulfur diesel fuel, utilizing off-road construction equipment that is compliant with Tier 3 engine standards at a minimum, applying soil stabilizers, replacing ground cover as soon as possible, and installing wheel washers. Compliance with these requirements is consistent with, and meets, or exceeds, the AQMP requirements for control strategies intended to reduce emissions from construction equipment and activities.

As the proposed Project would not conflict with the control strategies intended to reduce emissions from construction equipment, the proposed Project would not conflict with, or obstruct, implementation of the AQMP. Additionally, the projected emissions from the proposed Project would not exceed the SCAQMD's regional significance thresholds, as discussed in Impact 3.2-2. Thus, the proposed Project would not be considered by SCAQMD to be a substantial source of air pollutant emissions, and would not conflict with, or obstruct, implementation of the AQMP. Therefore, impacts would be less than significant to the 2022 AQMP with respect to construction activities.

City of Los Angeles General Plan Air Quality Element

The City's General Plan Air Quality Element establishes goals, objectives, and policies that would guide the City in the implementation of its air quality strategies and improvement programs. The proposed Project's consistency with relevant policies in the Air Quality Element is presented in **Table 3.1-7, *Proposed Project Consistency with Applicable Policies of the General Plan Air Quality Element***.

TABLE 3.1-7
PROPOSED PROJECT CONSISTENCY WITH APPLICABLE POLICIES OF THE GENERAL PLAN AIR QUALITY ELEMENT

Policy	Consistency Analysis
Goal 1: Good air quality and mobility in an environment of continued population growth and healthy economic structure.	**No conflict.** The proposed Project would meet the requirements applicable per the California Green Building Standards Code and the City of Los Angeles Green Building Standards Code. The proposed project would reduce VMT as LAUSD attendance is projected to decline over the next ten years, thus reducing vehicular travel to the proposed Project area. The proposed project has access to public transportation options within a quarter mile of the proposed Project site. As a result, the proposed Project would support objectives to achieve good air quality and mobility.
Objective 1.1: It is the objective of the City of Los Angeles to reduce air pollutants consistent with the Regional Air Quality Management Plan, increase traffic mobility, and sustain economic growth citywide.	**No conflict.** The proposed Project's land use characteristics and compliance with regulatory requirements would reduce emissions associated with energy and transportation. The proposed Project would maintain consistency with SCAG growth projections used for the preparation of the AQMP. The proposed Project is highly accessible by local bus lines along Fletcher Drive. As such, the proposed Project would support AQMP Transportation Control Measures related to reducing employee, staff, and student vehicle trips.
Objective 1.3: It is the objective of the City of Los Angeles to reduce particulate air pollutants emanating from unpaved areas, parking lots, and construction sites.	**No conflict**. The proposed Project would include measures to reduce particulate air pollutants from unpaved sites, parking areas, and construction sites. The proposed Project would be required to implement construction-related fugitive dust control measures in accordance with SCAQMD Rule 403. The proposed project would also comply with vehicle idling limitations as stated in LAUSD SC-AQ-4 and thus reduce DPM emissions. Construction of the proposed Project would also be subject to CARB Off-Road Diesel Vehicle Regulation to reduce emissions through DPM filter installations while encouraging the retirement, replacement, or repower of older, dirtier engines with updated emission-controlled models. Construction of the proposed Project would also comply with applicable provisions of the CARB Truck and Bus regulation to reduce PM and NO_x emissions from existing diesel trucks.
Goal 2: Less reliance on single-occupant vehicles with fewer commute and non-work trips.	**No conflict.** The 2023 SPEIR states that LAUSD Enrollment is projected to decrease within the next ten years, which would contribute to VMT reduction in the region and mobile-source air pollutant emissions. Nearby public transportation is accessible within a quarter mile of the proposed Project site. LAUSD encourages ride-sharing programs for students and teachers, including riding bicycles to school.
Objective 2.1: It is the objective of the City of Los Angeles to reduce work trips as a step towards attaining trip reduction objectives necessary to achieve regional air quality goals.	**No conflict.** The proposed Project site is located at within Central Los Angeles and a SCAG-designated High-Quality Transit Area. Public transit service to and from the proposed Project site is provided by LA Metro, which operates Bus Line 182 along Fletcher Drive with two bus stops nearby: Fletcher Drive/West Avenue 32 (0.3 mile southwest) and Fletcher

TABLE 3.1-7
PROPOSED PROJECT CONSISTENCY WITH APPLICABLE POLICIES OF THE GENERAL PLAN AIR QUALITY ELEMENT

Policy	Consistency Analysis
	Drive/Estara Avenue (0.1 mile northwest).
Policy 2.1.1: Utilize compressed work weeks and flextime, telecommuting, carpooling, vanpooling, public transit, and improve walking/bicycling related facilities in order to reduce vehicle trips and/or VMT as an employer and encourage the private sector to do the same to reduce work trips and traffic congestion.	**No conflict.** Public transit service to and from the proposed Project site is provided by LA Metro, which operates Bus Line 182 along Fletcher Drive with two bus stops nearby: Fletcher Drive/West Avenue 32 (0.3 mile southwest) and Fletcher Drive/Estara Avenue (0.1 mile northwest). LAUSD encourages ride-sharing programs for students and teachers, including riding bicycles to school. The proposed Project site also provides on-site bicycle parking spaces. All new development at the proposed Project site would not directly or indirectly eliminate alternative modes of transportation (see Section 3.7, *Transportation and Traffic)*.
Objective 2.2: It is the objective of the City of Los Angeles to increase vehicle occupancy for non-work trips by creating disincentives for single-passenger vehicles, and incentives for high-occupancy vehicles.	**No conflict.** The proposed Project's location would encourage alternatives to vehicular transportation to and from the proposed Project site. As mentioned, the proposed Project site is located within a quarter mile of public transportation. The proposed Project is also in close proximity to Bicycle lanes on the Fletcher Drive, Estara Avenue, Maguerite Street, and West Avenue 32 Roadways. LAUSD encourages ride-sharing programs for students and teachers, including riding bicycles to school. A bicycle rack is available near the main school entrance along Estara Avenue for students, staff, and faculty.
Goal 4: Minimal impact of existing land use development on air quality by addressing the relationship between land use, transportation, and air quality.	**No conflict.** The proposed Project's characteristics would reduce VMT in the short run as the number of classrooms would decrease from 65 to 46 to accommodate long-term needs of the school and community. The proposed Project site is pedestrian and bicycle-friendly and is within a quarter mile of public transportation opportunities.
Objective 4.1: It is the objective of the City of Los Angeles to include the regional attainment of ambient air quality standards as a primary consideration in land use planning.	**No conflict.** Analysis of the proposed Project's air quality impacts relies on the same numeric indicators of significance adopted by the SCAQMD, which considers attainment of the ambient air quality standards. The proposed Project impacts on a regional scale would be less than significant and would not cause or contribute to an exceedance of the ambient air quality standards.
Policy 4.1.2: Ensure that project level review and approval of land use development remain at the local level.	**No conflict.** The environmental review of the proposed Project would occur at the local level.
Objective 4.2: It is the objective of the City of Los Angeles to reduce vehicle trips and VMT associated with land use patterns.	**No conflict.** The proposed Project is subject to LAUSD jurisdiction, which is projecting a decrease in overall student enrollment within the next ten years. Additionally, the number of student classrooms would decrease by 19 to accommodate the long-term needs of the community and the school. The proposed Project site is located within a quarter mile of public transportation options and contains a bicycle parking rack near the main entrance of the school near Estara Avenue.
Policy 4.2.2: Improve accessibility for the City's residents to places of employment, shopping centers, and other establishments.	**No conflict.** The proposed Project is located within a quarter mile of accessible public transportation options that move to and from the proposed Project site. Public transit service to and from the proposed Project site is provided by LA Metro, which operates Bus Line 182 along Fletcher Drive with two bus stops nearby: Fletcher Drive/West Avenue 32 (0.3 mile southwest) and Fletcher Drive/Estara Avenue (0.1 mile northwest).
Policy 4.2.3: Ensure that new development is compatible with pedestrians, bicycles, transit, and alternative fuel vehicles.	**No conflict.** The proposed Project is located within a quarter mile of accessible public transportation options that move to and from the proposed Project site. Public transit service to and from

TABLE 3.1-7
PROPOSED PROJECT CONSISTENCY WITH APPLICABLE POLICIES OF THE GENERAL PLAN AIR QUALITY ELEMENT

Policy	Consistency Analysis
	the proposed Project site is provided by LA Metro, which operates Bus Line 182 along Fletcher Drive with two bus stops nearby: Fletcher Drive/West Avenue 32 (0.3 mile southwest) and Fletcher Drive/Estara Avenue (0.1 mile northwest). All new development at the proposed Project site would not directly or indirectly eliminate alternative modes of transportation (see Section 3.7, *Transportation and Traffic).*
Policy 4.2.4: Require that air quality impacts be a consideration in the review and approval of all discretionary projects.	**No conflict.** The air quality analysis conducted for the proposed Project in this EIR serves to identify air quality impacts. The analysis in this EIR will be used in the review and approval process for the proposed Project.
Policy 4.2.5: Emphasize trip reduction, alternative transit and congestion management measures for discretionary projects.	**No conflict.** The proposed Project is designed to address the most critical physical concerns of the building and grounds at the Irving MS Campus while providing needed renovations, modernizations, and reconfigurations. The proposed Project is located within a quarter mile of accessible public transportation options that move to and from the proposed Project site. Public transit service to and from the proposed Project site is provided by LA Metro, which operates Bus Line 182 along Fletcher Drive with two bus stops nearby: Fletcher Drive/West Avenue 32 (0.3 mile southwest) and Fletcher Drive/Estara Avenue (0.1 mile northwest). LAUSD encourages ride-sharing programs for students and teachers, including riding bicycles to school. The proposed Project site contains a bicycle parking rack near the main entrance of the school near Estara Avenue.
Objective 5.1: It is the objective of the City of Los Angeles to increase energy-efficiency of City facilities and private developments.	**No conflict.** The proposed Project would be designed and operated to meet the applicable requirements of the State of California Green Building Code, and the City of Los Angeles Green Building Code.
Policy 5.1.2: Effect a reduction in energy consumption and shift to nonpolluting sources of energy in its buildings and operations.	**No conflict.** The proposed Project would be designed and operated to meet the applicable requirements of the State of California Green Building Code, and the City of Los Angeles Green Building Code. The LAUSD Clean Energy resolution was approved by the LAUSD board on December 3, 2019, which commits the District to 100% clean, renewable energy by 2040.
Policy 5.1.4: Reduce energy consumption and associated air emissions by encouraging waste reduction and recycling.	**No conflict.** SC-USS-1 of the proposed Project outlines procedures for preparation and implementation, including reporting and documentation, of a Waste Management Plan for reusing, recycling, salvaging or disposal of non-hazardous waste materials generated during demolition and/or new construction to foster material recovery and re-use and to minimize disposal in landfills. 75% of all construction and demolition waste generated would be recycled, salvaged, and/or reused.
Policy 5.3: It is the objective of the City of Los Angeles to reduce the use of polluting fuels in stationary sources.	**No conflict.** As stated above, the proposed Project would be designed and operated to meet the applicable requirements of the State of California Green Building Code and the City of Los Angeles Green Building Code.
Policy 5.3.1: Support the development and use of equipment powered by electric or low-emitting fuels.	**No conflict.** As stated above, the proposed Project would be designed and operated to meet the applicable requirements of the State of California Green Building Code and the City of Los Angeles Green Building Code.

Source: City of Los Angeles. November 1992. General Plan Air Quality Element. Available at: https://planning.lacity.gov/odocument/0ff9a9b0-0adf-49b4-8e07-0c16feea70bc/Air_Quality_Element.pdf

The proposed Project would not conflict with the goals, objectives, and policies set forth in the City's General Plan Air Quality Element and be generally consistent with these guidelines as discussed above. The proposed Project would, therefore, not conflict with the 2022 AQMP or the City of Los Angeles General Plan Air Quality Element, and as such, the proposed Project would have less than significant impacts with respect to conflict with, or obstruction of, implementation of applicable air quality plans.

Significance Determination

Less than Significant.

Mitigation Measures

No mitigation measures are required.

Regional Emissions and Cumulatively-Considerable Non-Attainment Pollutants

Impact 3.2-1: The proposed Project would not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard.

Short-term pollutants would be generated by construction of the proposed Project. The proposed Project site currently operates as a middle school and would continue to remain so after construction. The proposed Project would not introduce any new long-term pollutants when operational (see Section 3.1.4). Therefore, only short-term construction emissions were evaluated for cumulative impacts.

Regional Construction Emissions

The worst-case daily emissions were calculated as maximum daily construction emissions for the duration of construction for the proposed Project. Appendix 6 to the Draft EIR includes detailed emissions calculations for the proposed Project. Results of the criteria pollutant calculations are presented in **Table 3.1-8, *Maximum Daily Unmitigated Regional Construction Emissions (Pounds per Day)***.

TABLE 3.1-8
MAXIMUM DAILY UNMITIGATED CONSTRUCTION EMISSIONS (POUNDS PER DAY)

	Construction Emissions (Pounds/Day)					
	ROGs	**NO_x**	**CO**	**SO_x**	**$PM_{2.5}$**	**PM_{10}**
2026 maximum daily emissions	0.42	5.95	4.95	0.02	0.42	1.34
2027 maximum daily emissions	0.54	4.38	6.38	0.01	0.24	0.58
2028 maximum daily emissions	0.52	4.16	6.28	0.01	0.23	0.57
2029 maximum daily emissions	56.1	3.99	6.15	0.01	0.22	0.56
Maximum daily emissions	56.1	5.95	6.38	0.02	0.42	1.34
SCAQMD daily significance construction threshold (pounds/day)	75	100	550	150	55	150
Significant?	**No**	**No**	**No**	**No**	**No**	**No**

Note: ROG = reactive organic gases; NO_x = oxides of nitrogen, CO = carbon monoxide, SO_x = oxides of sulfur; $PM_{2.5}$ = fine particulate matter; PM_{10} = coarse particulate matter; SCAQMD = South Coast Air Quality Management District.
Source: Appendix 6, *Emissions Calculations*.

As shown in Table 3.1-8, construction-related daily emissions for the criteria and precursor pollutants (VOC, NOx, CO, SOx, PM_{10}, and $PM_{2.5}$) would be below the SCAQMD numeric thresholds. These calculations include compliance with appropriate dust control measures mandated to be implemented during each phase development, as required under SCAQMD Rule 403 (Control of Fugitive Dust) and SC-AQ-2 through SC-AQ-4. As previously discussed, SC-AQ-2 would obligate construction contractors to have off-road equipment properly tuned and maintained in accordance with the manufacturer's specifications. SC-AQ-3 would implement methods for reducing onsite dust emissions during soil removal. SC-AQ-4 is intended to reduce construction exhaust and fugitive dusts emissions with a number of features including utilizing off-road construction equipment that is compliant with Tier 3 engine standards (at a minimum) and applying soil stabilizers. SC-AQ-4 requires that Tier 3- or Tier 4-compliant off-road construction equipment be used during construction. LAUSD would require that all equipment meet Tier 4 standards when feasible and equipment is available. Where Tier 4 equipment is not feasible or available for use on the proposed Project, Tier 3-compliant equipment will be required. As the possibility of Tier 3 equipment exists, construction emissions were estimated assuming Tier 3 equipment as a worst-case emissions estimate. Therefore, impacts would be less than significant with respect to regional emissions from construction activities.

With respect to all SUP projects, including the proposed Project, Section 5.3-2 of the 2023 SPEIR states that construction activities may generate short-term emissions that exceed significance thresholds. Though construction emissions for this Project are not expected to exceed regional thresholds, the District will implement SCs AQ-2, SC-AQ-3, and SC-AQ-4 to ensure that construction emissions would be minimized.

Cumulatively Considerable Non-Attainment Pollutants

Since the District has no control over the timing or sequencing of the related projects, any quantitative analysis of related projects to ascertain daily construction emissions that assumes multiple, concurrent projects would be speculative. For this reason, the SCAQMD's methodology to assess a project's cumulative impact differs from the cumulative impact methodology employed for other environmental topics. The SCAQMD recommends that Project-specific air quality impacts of the proposed Project be used to determine the cumulative impacts to regional air quality. The proposed Project would result in the emission of criteria pollutants for which the area is in non-attainment during construction. A significant impact may occur if a project would add a cumulatively considerable

contribution of a federal or state non-attainment pollutant. The SCAB is currently in non-attainment for O_3, PM_{10}, and $PM_{2.5}$.

Construction emissions from the proposed Project are not projected to exceed the SCAQMD regional significance impact thresholds and, therefore, are not expected to cause, or substantially contribute to, ground level concentrations that exceed the NAAQS or CAAQS. Furthermore, the District would implement SC-AQ-2, SC-AQ-3, and SC-AQ-4 to ensure that construction emissions would minimize off-site impacts.[30] Therefore, the proposed Project would not result in a cumulatively considerable net increase for non-attainment pollutants, or O_3 precursors, and would result in a less than significant impact for construction emissions.

Significance Determination

Less than Significant.

Mitigation Measures

No mitigation measures are required.

Sensitive Receptors

Impact 3.2-3: The Proposed Project would not expose sensitive receptors to substantial pollutant concentrations.

Localized Emissions

The localized construction and operational air quality analysis was conducted using the methodology described in the SCAQMD *LST Methodology.*[31] The screening criteria provided in the *LST Methodology* were used to determine localized construction and operation emissions thresholds for the Project.

Construction

The maximum daily localized emissions for each construction year and LST's are presented in **Table 3.1-9*, Maximum Unmitigated Localized Construction Emissions (Pounds per Day*)**. Maximum localized construction emissions for sensitive receptors would not exceed the localized thresholds for NO_x, CO, PM_{10}, and $PM_{2.5}$. Therefore, impacts would be less than significant during construction with respect to localized emissions from construction activities.

[30] Los Angeles Unified School District. 2023. Subsequent Program EIR for the School Upgrade Program. http://achieve.lausd.net/ceqa.

[31] South Coast Air Quality Management District. July 2008. Final Localized Significance Threshold Methodology. https://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/final-lst-methodology-document.pdf?sfvrsn=2

TABLE 3.1-9
MAXIMUM UNMITIGATED LOCALIZED CONSTRUCTION EMISSIONS (POUNDS PER DAY)

Category	Construction Emissions (Pounds/Day)			
	NO_x	CO	$PM_{2.5}$	PM_{10}
Maximum Daily Construction Emissions from Project (2026)	5.95	4.95	0.42	1.34
Maximum Daily Construction Emissions from Project (2027)	4.38	6.38	0.24	0.58
Maximum Daily Construction Emissions from Project (2028)	4.16	6.28	0.23	0.57
Maximum Daily Construction Emissions from Project (2029)	3.99	6.15	0.22	0.56
Maximum Daily Construction Emissions from Project	5.95	6.38	0.42	1.34
Total	**18.48**	**23.76**	**1.11**	**3.05**
SCAQMD daily significance construction thresholds for two acres for a sensitive receptor located 25 Meters from the site boundary (pounds/day)	**108**	**1,048**	**5**	**8**
Significant?	**No**	**No**	**No**	**No**

Note: ROG = reactive organic gases; NO_x = oxides of nitrogen, CO = carbon monoxide, SO_x = oxides of sulfur; $PM_{2.5}$ = fine particulate matter; PM_{10} = coarse particulate matter; SCAQMD = South Coast Air Quality Management District.

Source: Appendix 6, *Emissions Calculations*.

South Coast Air Quality Management District. June 2008. Appendix C, LST Mass Look-up Tables. Final Localized Significance Thresholds Methodology. http://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/appendix-c-mass-rate-lst-look-up-tables.pdf?sfvrsn=2

Operations

The maximum daily localized emissions for the operational phase and LST significance thresholds are presented in **Table 3.1-10*, Maximum Unmitigated Localized Operations Emissions (Pounds per Day)***. As shown therein, unmitigated maximum localized operation emissions exposure to the nearest sensitive receptors would not exceed the localized thresholds for NO_x, CO, $PM_{2.5}$, and PM_{10}. The majority of operational emissions would stem from CO area sources, such as landscape maintenance activities. The emissions from operation of the proposed project would be comparable to the existing condition since the proposed project is a modernization initiative that would not change the project site's land use nor result in new vehicle trips and, thus, would not increase mobile emissions. Energy upgrades from the proposed project would increase energy efficiency at the proposed project site with implementation of CHPS-design facilities, thus, resulting in additional reductions in energy emissions. Therefore, impacts would be less than significant during operations with respect to localized emissions from operational activities.

TABLE 3.1-10
MAXIMUM UNMITIGATED LOCALIZED OPERATION EMISSIONS (POUNDS PER DAY)

Category	Operation Emissions (Pounds/Day)			
	NO_x	CO	$PM_{2.5}$	PM_{10}
Area	0.02	2.61	<0.005	<0.005
Energy	0.32	0.27	0.02	0.02
Mobile	0.00	0.00	0.00	0.00
Maximum Daily Operation Emissions from Project	0.32	2.61	0.02	0.02
Total	0.34	2.88	0.03	0.03
SCAQMD LST significance operation thresholds for two acres for a sensitive receptor located 25 meters from the site boundary (pounds/day)	**108**	**1,048**	**2**	**2**
Significant?	**No**	**No**	**No**	**No**

Note: ROG = reactive organic gases; NO_x = oxides of nitrogen, CO = carbon monoxide, SO_x = oxides of sulfur; $PM_{2.5}$ = fine particulate matter; PM_{10} = coarse particulate matter; SCAQMD = South Coast Air Quality Management District.

Source: Appendix 6, *Emissions Calculations*.

South Coast Air Quality Management District. June 2008. Appendix C, LST Mass Look-up Tables. Final Localized Significance Thresholds Methodology. http://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/appendix-c-mass-rate-lst-look-up-tables.pdf?sfvrsn=2

Health Impacts

The health-based ambient air quality standards for ozone are as concentrations of ozone and not as tonnages of their precursor pollutants (i.e., NO_x and VOCs). It is not necessarily the tonnage of precursor pollutants that causes human health effects, but the concentration of resulting ozone or particulate matter. Because of the complexity of ozone formation and the non-linear relationship of ozone concentration with its precursor gases, and given the state of environmental science modeling in use at this time, it is infeasible to convert specific emission levels of NO_x or VOCs emitted in a particular area to a particular concentration of ozone in that area. Meteorology, the presence of sunlight, seasonal impacts, and other complex chemical factors all combine to determine the ultimate concentration and location of ozone.[32]

As expressed in the *amicus curiae* brief for the *Sierra Club v. County of Fresno* case (*Friant Ranch Case*), the CEQA criteria pollutants significance thresholds from the air district were set at emission levels tied to the region's attainment status, they are emission levels at which stationary pollution sources permitted by the air district must offset their emissions and CEQA projects must use feasible mitigations, and they are not intended to be indicative of any localized human health impact that a project may have.[33] Therefore, a project's exceedance of the mass regional emissions threshold (i.e., pounds per day VOC thresholds) from project-related activities does not necessarily indicate that the project will cause or contribute to the exposure of sensitive receptors to ground-level concentrations in excess of health-protective levels.

[32] South Coast Air Quality Management District. Adopted December 2, 2022. 2022 Air Quality Management Plan. https://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2022-air-quality-management-plan/final-2022-aqmp/final-2022-aqmp.pdf?sfvrsn=16

[33] National Law Review. January 22, 2024. California Supreme Court Clarifies Scope of De Navo and Substantial Evidence Standards of Review in CEQA Cases. https://www.natlawreview.com/article/california-supreme-court-clarifies-scope-de-novo-and-substantial-evidence-standards

The primary health concern with exposure to VOC emissions is the secondary formation of ozone. As the *amicus curiae* briefs submitted for the Friant Ranch Case suggested, because of the complexity of ozone formation and given the state of environmental science modeling in use at this time, it is infeasible to determine whether, or the extent to which, a single project's precursor (i.e., NO_x and VOCs) emissions would result in the formation of secondary ground-level ozone and the geographic and temporal distribution of such secondary formed emissions.[34] As previously stated, meteorology, the presence of sunlight, seasonal impacts, and other complex chemical factors all combine to determine the ultimate concentration and location of ozone. Furthermore, available models today are designed to determine regional, population-wide health impacts, and cannot accurately quantify ozone-related health impacts caused by NOx or VOC emissions from a local (Project) level. Notwithstanding these scientific constraints, the disconnect between Project-level VOC emissions and ozone-related health impacts cannot be bridged at this time.

However, since construction of the proposed Project would not exceed the regional significance thresholds, the Project is not anticipated to contribute to health impacts related to these pollutants.

Toxic Air Contaminants

Project-related construction could expose sensitive receptors to substantial pollutant concentrations of TACs. TACs are pollutants for which neither California nor the federal government has set ambient air quality thresholds, but which still pose health risks to sensitive individuals. The primary TAC of concern from construction is DPM. Inhalation of DPM has been linked to increased cancer risk and chronic health hazards.[35]

The proposed Project includes the modernization and upgrade of facilities on the Irving MS Campus. The 2023 SPEIR states that modernization projects would not cause a change in toxic air contaminant exposure levels.[36] Therefore, impacts to sensitive receptors associated with the release of TACs would be less than significant, and no mitigation is required.

Significance Determination

Less than Significant.

Mitigation Measures

No mitigation measures are required.

[34] Supreme Court of California. April 2015. Amicus Curiae: Sierra Club, Revive the San Joaquin, and League of Women Voters of Fresno v. County of Fresno. https://www.courts.ca.gov/documents/7-s219783-ac-san-joaquin-valley-unified-air-pollution-control-dist-041315.pdf

[35] Occupational Safety and Health Administration. N.d. Hazard Alert – Diesel Exhaust/Diesel Particulate Matter. https://www.osha.gov/sites/default/files/publications/OSHA-3590.pdf

[36] Los Angeles Unified School District. October 2023. Final Subsequent Environmental Impact Report. https://www.lausd.org/cms/lib/CA01000043/Centricity/domain/135/ceqa/LAUSD%20SPEIR%20FINAL%20DRAFT.pdf

3.1.6 Cumulative Impact Analysis

The proposed Project would result in the emission of criteria pollutants for which the region is in non-attainment during both construction and operation. The Air Basin fails to meet national standards for O_3 and $PM_{2.5}$ and, therefore, is considered a federal "non-attainment" area for these pollutants. Consistent with accepted and established SCAQMD cumulative impact evaluation methodologies, the assessment of the potential for the proposed Project to result in cumulative impacts is based on SCAQMD thresholds (see Section 3.1.3, *Thresholds of Significance*).

As shown in Table 3.1-8, regional construction emissions calculated for the proposed Project would not exceed the applicable SCAQMD daily significance thresholds. The thresholds are designed to assist the region in attaining the applicable State and national ambient air quality standards. These standards apply to both primary (criteria and precursor) and secondary pollutants (O_3). Although the proposed Project site is located in a region that is in non-attainment for O_3 and $PM_{2.5}$, the emissions associated with the proposed Project would not be cumulatively considerable as the emissions would fall below SCAQMD daily significance thresholds. The proposed Project would additionally be consistent with the AQMP, which is intended to bring the Air Basin into attainment for all criteria pollutants.

The SCAQMD's methodology to assess a project's cumulative impacts differs from the cumulative impact methodology employed for other environmental topics (such as traffic), which are typically based on the number, types, and proximity to related projects. The SCAQMD recommends that Project-specific air quality impacts be used to determine the cumulative impacts to regional air quality.

With respect to the proposed Project's short-term construction-related air quality emissions and cumulative conditions, the SCAQMD has developed strategies to reduce criteria pollutant emissions outlined in the AQMP pursuant to the federal CAA mandates. Construction of the proposed Project would comply with SCAQMD Rule 403 requirements and CARB's Off-Road Regulation to limit heavy duty diesel motor vehicle idling to no more than five minutes at any given time (per SC-AQ-4). Per SCAQMD rules and mandates, as well as the CEQA requirement that significant impacts be mitigated to the extent feasible, these same requirements (i.e., Rule 403 compliance, the implementation of all feasible mitigation measures, and compliance with adopted AQMP emissions control measures) would also be imposed on all construction projects in the Air Basin, which would include the cumulative projects in the proposed Project area. As shown above in Tables 3.1-8, 3.1-9, and 3.1-10, regional and localized construction and operation emissions associated with the proposed Project would not exceed the SCAQMD daily significance thresholds. As such, the proposed Project's contribution to cumulatively significant construction impacts to air quality would not be cumulatively considerable, and cumulative impacts would be less than significant for regional and local criteria pollutants during construction and operation.

3.1.7 References

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3.2 Cultural Resources

This section assesses the potential impacts of the proposed Project to cultural resources in the Project vicinity in accordance with the significance criteria established in Appendix G of the CEQA Guidelines. This section is based on a CEQA Historical Resources Technical Report prepared by Sapphos Environmental, Inc. (HRTR; **Appendix 5**) and a Historical Resources Evaluation Report prepared by ASM Affiliates, Inc.[1] (HRER) (see **Appendix 1-B**).

Cultural resources include prehistoric and historic-period sites, structures, districts, places, and landscapes, or any other physical evidence associated with human activity considered important to a culture, a subculture, or a community for scientific, traditional, religious, or other reasons. Under CEQA, for the purposes of this analysis, cultural resources may be categorized into the following groups: archaeological resources, historic resources (including architectural/engineering resources), contemporary Native American resources, and human remains. Archaeological resources were determined in the Initial Study to result in less than significant impacts with implementation of Standard Conditions SC-CUL-6 through -9 for evaluation and appropriate treatment of any unanticipated discovery of archaeological resources and, therefore, are not carried forward for analysis in the EIR. Human remains were determined in the Initial Study to result in less than significant impacts with implementation of Standard Condition SC-CUL-10 and Section 7050.5 of the California Health and Safety Code for appropriate treatment of any unanticipated disturbance of human remains and, therefore, are not carried forward for analysis in the EIR.

3.2.1 Environmental Setting

Built Environment

The proposed Project site is a Science, Technology, Engineering, Art and Mathematics (STEAM) magnet school campus composed of a number of standing buildings as well as landscaped and hardscaped surfaces within the Glassell Park neighborhood in the City of Los Angeles. The school is part of the LAUSD Glassell Park and Los Feliz Community of Schools in the Northeast Los Angeles Community Plan Area. Land uses surrounding the Project site are comprised of public facilities, single- and multifamily residential, neighborhood commercial, commercial manufacturing, and limited manufacturing uses.

Although major elements of the exteriors of the original Campus buildings are vertically oriented, the composition of the façades also emphasizes horizontality, a characteristic identified in the LAUSD Historic Context Statement (HCS) as associated with Streamline Moderne/Moderne architecture.[2] All of the original buildings are constructed of reinforced cast concrete. In the case of the Bergstrom-designed buildings, the exterior walls display a prominent horizontal board-form texture, and heavy fluted cast plaster pilasters flank entrances and are highlighted by a paint palette of royal blue contrasting with stark white exterior walls. All of the major original Campus buildings have flat parapets and horizontal stringcourses encircling the exteriors a

[1] ASM Affiliates, Inc. 2022. Historic Resource Evaluation Report: Irving Middle School. Prepared for Los Angeles Unified School District, Office of Environmental Health & Safety.

[2] Sapphos Environmental, Inc. 2014. Los Angeles Unified School District Historic Context Statement, 1870 to 1969. Prepared for Los Angeles Unified School District, Office of Environmental Health and Safety.

few feet below the parapet and stringcourses above and below the windows, creating a horizontal look in contrast with the verticality of the pilasters.

Geologic Setting

The Project site is situated in the Los Angeles Basin, in the Northern Peninsular Ranges geomorphic province and U.S. Geological Survey (USGS) 7.5-minute series *Los Angeles* quadrangle. The Peninsular Ranges spans from the California coast eastward to the San Bernardino Fault and extends from the Colorado Desert to the northeast and the San Diego coastline to the southwest.[3] The Los Angeles Basin developed from tectonic activity occurring along the San Andreas Fault, with subsidence occurring 18 to 3 million years ago.[4] Marine sediment began to accumulate in the Basin during the middle Miocene, approximately 13 million years ago. Terrestrial alluvial deposits dating to the Pleistocene overlay the Miocene deposits resulting from erosion of the uppermost deposition of the Basin in the surrounding highlands.[5]

Prehistoric Setting

The chronology of southern California is typically divided into three general time periods: the Early Holocene (9,600 cal B.C. to 5,600 cal B.C. [a "cal" date is one that is calibrated by radiocarbon]), the Middle Holocene (5,600 cal B.C. to 1,650 cal B.C.), and the Late Holocene (1,650 cal B.C. to cal A.D. 1769). This chronology is manifested in the archaeological record by particular artifacts and burial practices that indicate specific technologies, economic systems, trade networks, and other aspects of culture.

While it is not certain when humans first came to California, their presence in southern California by about 9,600 cal B.C. has been well documented. At Daisy Cave, on San Miguel Island, cultural remains have been radiocarbon dated to between 9,150 and 9,000 cal B.C.[6] During the Early Holocene (9,600 cal B.C. to 5,600 cal B.C.), the climate of Southern California became warmer and more arid and human populations, who likely lived in small bands, appear to have resided mainly in coastal or inland desert areas. As the climate dried, they began to exploit a wider range of plant and animal resources.

During the Middle Holocene (5,600 cal B.C. to 1,650 cal B.C.), there is evidence for the processing of acorns for food and a shift toward a more generalized economy. The first confirmed evidence of human occupation in the Los Angeles area is associated with the Millingstone cultures, which appeared in California around 6,000 to 5,000 cal B.C.[7,8,9] Millingstone cultures were characterized by the collection and processing of plant

3 Norris, R. M., and R. W. Webb. 1990. Geology of California, second edition: John Wiley & Sons, New York.

4 Critelli, S. P. Rumelhart, and R. Ingersoll, 1995. Petrofacies and provenance of the Puente Formation (middle to upper Miocene), Los Angeles Basin, southern California: implications for rapid uplift and accumulation rates. Journal of Sedimentary Research A65: 656-667.

5 Yerkes, R. F., T. H. McCulloh, J. E. Schoellhamer, and J. G. Vedder. 1965. Geology of the Los Angeles Basin, California – an introduction. U.S. Geological Survey Professional Paper 420-A. 64 p.

6 Byrd, Brian F., and L. Mark Raab. 2007. Prehistory of the Southern Bight: Models for a New Millennium, in California Prehistory: Colonization, Culture, and Complexity, edited by Terry L. Jones and Kathryn A. Klar, pp. 215-227.

7 Byrd, Brian F., and L. Mark Raab. 2007. Prehistory of the Southern Bight: Models for a New Millennium, in California Prehistory: Colonization, Culture, and Complexity, edited by Terry L. Jones and Kathryn A. Klar, pp. 215-227.

8 Wallace, William J. 1955. Suggested Chronology for Southern California Coastal Archaeology. Southwestern Journal of Anthropology 11(3): 214-230.

foods, particularly acorns, and the hunting of a wider variety of game animals.[10,11] Millingstone cultures also established more permanent settlements that were located primarily on the coast and in the vicinity of estuaries, lagoons, lakes, streams, and marshes where a variety of resources, including seeds, fish, shellfish, small mammals, and birds, were exploited. Early Millingstone occupations are typically identified by the presence of handstones (manos) and millingstones (metates), while those Millingstone occupations dating later than approximately 3,000 B.C. contain a mortar and pestle complex as well, signifying the exploitation of acorns in the region.

During the Late Holocene (1,650 cal B.C. to cal A.D. 1769), many aspects of Millingstone culture persisted, but a number of socioeconomic changes occurred.[12,13,14] The native populations of southern California were becoming less mobile, and populations began to gather in small sedentary villages with satellite resource-gathering camps. Increasing population size necessitated the intensified use of existing terrestrial and marine resources.[15] Evidence indicates that the overexploitation of larger, high-ranked food resources may have led to a shift in subsistence, towards a focus on acquiring greater amounts of smaller resources, such as shellfish and small-seeded plants.[16] Between about A.D. 800 and A.D. 1350, there was an episode of sustained drought, known as the Medieval Climatic Anomaly (MCA).[17] While this climatic event did not appear to reduce the human population, it did lead to a change in subsistence strategies in order to deal with the substantial stress on resources. The Late Holocene marks a period in which specialization in labor emerged, trading networks became an increasingly important means by which both utilitarian and non-utilitarian materials were acquired, and travel routes were extended. Trade during this period reached its zenith as asphaltum (tar), seashells, and steatite were traded from Catalina Island (Pimu or Pimugna) and coastal southern California to the Great Basin. Major technological changes appeared as well, particularly with the advent of the bow and arrow sometime after cal A.D. 500, which largely replaced the use of the dart and atlatl.[18]

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9 Warren, Claude. 1968. Cultural Tradition and Ecological Adaptation on the Southern California Coast, In Archaic Prehistory in the Western United States, edited by C. Irwin-Williams, pp. 1-14, Eastern New Mexico University Contributions in Anthropology, 1(3).

10 Byrd, Brian F., and L. Mark Raab. 2007. Prehistory of the Southern Bight: Models for a New Millennium, in California Prehistory: Colonization, Culture, and Complexity, edited by Terry L. Jones and Kathryn A. Klar, pp. 215-227.

11 Wallace, William J. 1955. Suggested Chronology for Southern California Coastal Archaeology. Southwestern Journal of Anthropology 11(3): 214-230.

12 Wallace, William J. 1955. Suggested Chronology for Southern California Coastal Archaeology. Southwestern Journal of Anthropology 11(3): 214-230.

13 Warren, Claude. 1968. Cultural Tradition and Ecological Adaptation on the Southern California Coast, In Archaic Prehistory in the Western United States, edited by C. Irwin-Williams, pp. 1-14, Eastern New Mexico University Contributions in Anthropology, 1(3).

14 Erlandson, Jon M. 1994. Early Hunter-Gatherers of the California Coast, Plenum Press.

15 Erlandson, Jon M. 1994. Early Hunter-Gatherers of the California Coast, Plenum Press.

16 Byrd, Brian F., and L. Mark Raab. 2007. Prehistory of the Southern Bight: Models for a New Millennium, in California Prehistory: Colonization, Culture, and Complexity, edited by Terry L. Jones and Kathryn A. Klar, pp. 215-227.

17 Jones, Terry L., Gary M. Brown, L. Mark Raab, Janet L. McVickar, W. Geoffrey Spaulding, Douglas J. Kennett, Andrew York, and Phillip L. Walke,. Environmental Imperatives Reconsidered: Demographic Crises in Western North America during the Medieval Climactic Anomaly, Current Anthropology, 40(2): 137-70, 1999.

18 Byrd, Brian F., and L. Mark Raab. 2007. Prehistory of the Southern Bight: Models for a New Millennium, in California Prehistory: Colonization, Culture, and Complexity, edited by Terry L. Jones and Kathryn A. Klar, pp. 215-227.

Ethnographic Setting

The Project site is located in a region traditionally occupied by the Takic-speaking Gabrielino Indians and Tongva Native American tribes. The Chumash, Tataviam, Gabrieleno, Kitanemuk, Vanyuma, Cahuilla, and Cahuilla Luiseno cultural affiliations were all identified in a Native American Contact List for the Project provided on August 21, 2023, by the Native American Heritage Commission (NAHC).

The term "Gabrielino" is a general term that refers to those Native Americans who were administered by the Spanish at the Mission San Gabriel Arcángel. Prior to European colonization, the Gabrielino occupied a diverse area that included: the watersheds of the Los Angeles, San Gabriel, and Santa Ana rivers; the Los Angeles basin; and the islands of San Clemente, San Nicolas, and Santa Catalina.[19] Their neighbors included the Chumash to the north, the Juañeno to the south, and the Serrano and Cahuilla to the east. The Gabrielino are reported to have been second only to the Chumash in terms of population size and regional influence.[20] The Gabrielino language is part of the Takic branch of the Uto-Aztecan language family.

Traditionally, the Gabrielino Indians practiced a hunter-gatherer lifestyle and typically established permanent settlements adjacent to annually flowing fresh water sources. Community populations generally ranged from 50 to 100 inhabitants, although larger settlements may have existed. The Gabrielino are estimated to have had a population numbering around 5,000 in the pre-contact period.[21] Villages are reported to have been the most abundant in the San Fernando Valley, the Glendale Narrows area north of downtown, and around the Los Angeles River's coastal outlets.[22]

Subsistence consisted of hunting, fishing, and gathering. Small terrestrial games were hunted with deadfalls, rabbit drives, and by burning undergrowth, while larger game such as deer were hunted using bows and arrows. Fish were taken by hook and line, nets, traps, spears, and poison.[23] The primary plant resources were the acorn, gathered in the fall and processed in mortars and pestles, and various seeds that were harvested in late spring and summer and ground with manos and metates. The seeds included chia and other sages, various grasses, and islay or holly-leafed cherry.

Gabrielino society was characterized by patrilineal, non-localized clans, each clan consisting of several lineages. The Gabrielino inhabited large circular, domed houses constructed of willow poles thatched with tule.[24] These houses could sometimes hold up to 50 people. Other village structures of varying sizes served as sweathouses, ceremonial enclosures, and granaries. At the time of Spanish contact, many Gabrielino practiced a religion that was centered around the mythological figure Chinigchinich This religion may have been relatively new when the Spanish arrived and was spreading at that time to other neighboring Takic groups. The Gabrielino practiced both cremation and inhumation of their dead. A wide variety of grave offerings,

19 Kroeber, Alfred L. 1925. Handbook of Indians of California. Dover Publications, Inc.

20 Bean, Lowell J., and Charles R. Smith.1978. Gabrielino, in California, edited by R.F. Heizer, pp. 538-549 Handbook of North American Indians, Vol. 8, W. C. Sturtevant, general editor, Smithsonian Institution.

21 Kroeber, Alfred L. 1925. Handbook of Indians of California. Dover Publications, Inc.

22 Gumprecht, Blake. 1999/2001. Los Angeles River: Its Life, and Possible Rebirth. Johns Hopkins University Press.

23 Bean, Lowell J., and Charles R. Smith.1978. Gabrielino, in California, edited by R.F. Heizer, pp. 538-549 Handbook of North American Indians, Vol. 8, W. C. Sturtevant, general editor, Smithsonian Institution.

24 Bean, Lowell J., and Charles R. Smith.1978. Gabrielino, in California, edited by R.F. Heizer, pp. 538-549 Handbook of North American Indians, Vol. 8, W. C. Sturtevant, general editor, Smithsonian Institution.

such as stone tools, baskets, shell beads, projectile points, bone and shell ornaments, and otter skins, were interred with the deceased.

Coming ashore on Santa Catalina Island in October of 1542, Juan Rodriguez Cabrillo was the first European to make contact with the Gabrielino-Tongva; the 1769 expedition of Portolá also passed through Gabrielino territory.[25] Native Americans suffered severe depopulation and their traditional culture was radically altered after Spanish contact. Nonetheless, Gabrielino descendants still reside in the greater Los Angeles and Orange County areas and maintain an active interest in their heritage.

Historic Setting

History of Southern California

The recorded historical background of Southern California and the Los Angeles Basin containing Irving MS can be generally divided into three major periods of political occupation: The Spanish Period (CE [Common Era] 1769–1821), the Mexican Period (CE 1821–1848), and the American Period (CE 1846–present).

Spanish Period (CE 1769–1821)

Although Spanish explorers made brief visits to the region in 1542 and 1602, sustained European exploration of southern California began in 1769, when Gaspar de Portolá began an exploratory journey along the California coast, followed in 1776 by the expedition of Father Francisco Garcés.[26] In the late 18th century, the Spanish began establishing missions in California and forcibly relocating and converting native peoples. In 1771, Father Junipero Serra founded the Mission San Gabriel Arcángel, located approximately 7.8 miles east of Irving Middle School.[27] Disease and hard labor took a toll on the native population in California; by 1900, the Native Californian population had declined by as much as 90 percent, drastically altering native ways of life.[28] In an effort to promote Spanish settlement of Alta California, Spain granted several large land concessions from 1784 to 1821. El Pueblo de Nuestra Señora la Reina de los Ángeles de Porciúncula (El Pueblo de Los Angeles) was founded as a farming community by a group of 44 settlers from present-day northern Mexico (central New Spain) in 1781, 4.5 miles from Irving MS.[29]

Mexican Period (CE 1821–1848)

In 1821, Mexico won its independence from Spain and continued to promote settlement of California with the issuance of land grants. In 1833, Mexico began the process of secularizing the missions, reclaiming the majority of mission lands and redistributing them as land grants. According to the terms of the Secularization

[25] Bean, Lowell J., and Charles R. Smith.1978. Gabrielino, in California, edited by R.F. Heizer, pp. 538-549 Handbook of North American Indians, Vol. 8, W. C. Sturtevant, general editor, Smithsonian Institution.

[26] Johnson, John R. and David D. Earle. 1990. Tataviam Geography and Ethnohistory. Journal of California and Great Basin Anthropology 12(2): 191-214.

[27] California Missions Resource Center. N.d. San Gabriel Arcángel - The Fourth of the California Missions. https://www.missionscalifornia.com/missions/san-gabriel-arcangel/ (accessed June 5, 2024).

[28] Cook, Sherburne F. 1978. Historical Demography. In California, edited by Robert F. Heizer, pp. 91–98, Handbook of North American Indians, Vol. 8, W. C. Sturtevant, general editor, Smithsonian Institution.

[29] City of Los Angeles. N.d. The History of Los Angeles. https://lacity.gov/government/history-los-angeles#:~:text=On%20September%204%2C%201781%20a,El%20Pueblo%20de%20Nuestra%20Se%C3%B1ora

Law of 1833 and Regulations of 1834, at least a portion of the lands would be returned to the Native populations, but this did not always occur.[30]

American Period (CE 1846–Present)

The Mexican-American War broke out in 1846, with the Mexican forces eventually defeated in 1847. Mexico ceded California to the United States as part of the Treaty of Guadalupe Hildalgo in 1848, and California officially became one of the United States in 1850. While the treaty recognized the right of Mexican citizens to retain ownership of land granted to them by Spanish or Mexican authorities, the claimant was required to prove their right to the land before a patent was given. The process was lengthy and generally resulted in the claimant losing at least a portion of their land to attorney's fees and other costs associated with proving ownership.[31]

When the discovery of gold in northern California was announced in 1848, a huge influx of people from other parts of North America flooded into California. The increased population provided an additional outlet for the Californios' cattle. The cattle industry grew in profitability with the increased demand for beef, but this prosperity was cut short when a devastating flood in 1861, and droughts in 1862 and 1864, killed over 70 percent of the cattle.[32, 33] This event, coupled with the burden of proving ownership of their lands, caused many Californios to lose their lands during this period.[34] Former ranchos were subsequently subdivided and sold for agriculture and residential settlement.

Southern California experienced a population surge of newcomers from the eastern United States after San Francisco was connected to the first transcontinental railroad in 1869. This continued when the Southern Pacific Railroad connected San Francisco to Los Angles in 1876, and when the Santa Fe Route of the second transcontinental line was completed in 1886. Settlers flooded into the region and the demand for real estate skyrocketed, incentivizing landowners to sell their agricultural land to become residential communities. The subdivision of the large ranchos took place during this time.[35,36] During the first three decades of the 20th century, more than 2 million people moved to Los Angeles County, transforming it from a largely agricultural region into a major metropolitan area.

History of Glassell Park

In the late 1700s, land between the Los Angeles River and the Arroyo Seco was given to Jose Maria Verdugo by Spanish Governor Pedro Fages. Over 30,000 acres of this land were later purchased from the Verdugo family by attorney Alfred Beck Chapman and Andrew Glassell in 1869. The land was originally surrounded by citrus orchards and walnut groves. The land was eventually subdivided into parcels, forming present-day

30 Milliken, Randall, Laurence H. Shoup, and Beverly R. Ortiz. 2009. Ohlone/Costanoan Indians of the San Francisco Peninsula and their Neighbors, Yesterday and Today. Prepared by Archaeological and Historical Consultants. Prepared for National Park Service Golden Gate National Recreation Area.

31 Starr, Kevin. 2007. California: A History. Modern Library.

32 McWilliams, Carey. 1946. Southern California: An Island on the Land. Gibbons Smith.

33 Dinkelspiel, Frances. 2008. Towers of Gold. St. Martin's Press.

34 McWilliams, Carey. 1946. Southern California: An Island on the Land. Gibbons Smith.

35 Meyer, Larry. 1981. Los Angeles, 1781-1981: A special bicentennial issue of California history, Spring 1981, California Historical Society.

36 McWilliams, Carey. 1946. Southern California: An Island on the Land. Gibbons Smith.

communities such as Atwater Village, Highland Park, Mount Washington, Eagle Rock, and Glassell Park (where Irving MS is located). By 1901, Glassell's family had sold large portions of land to the Gilchrist Investment Company, which began development on the land in the decade following. In 1912, Glassell Park was purchased again by Home and Town Builders. In the same year, a majority of the town was annexed to the City of Los Angeles as a part of the Arroyo Seco Addition. By 1916, the rest of Glassell Park was annexed to the City. Throughout the 1910s and 1920s, development continued in Glassell Park. Residential spaces and single-family residences in Glassell Park typically included mostly Craftsman architectural style.[37]

History of LAUSD

As noted in the HCS, the history of LAUSD, founded in 1872, comprises four distinct eras within its history: the Founding Years (1870s–1909); the Progressive Education Movement: Standardization and Expansion (1910–1933); the Era of Reform: Great Depression, Earthquake, and Early Experiments in the Modern, Functionalist School (1933–1945); and Educating the Baby Boom: Postwar Expansion and the Functional, Modern School (1945–1969).[38]

Founding Years (1870s–1909)

The schools of this first era were wood-framed, one- or two-room schoolhouses, with bell towers, similar to early schools around the country in the time period. The population growth from the completion of the transcontinental railroad led to a number of problems in the new school district. These included overcrowding, no uniform curriculum, wildly disparate education levels of incoming students, and a severe lack of funding. Just before the turn of the century, the District was finally granted the authority to sell bonds and was able to raise $200,000 for a desperately needed new building campaign. Through a series of these campaigns, LAUSD was able to construct modern school facilities representative of the new, progressive education movement sweeping through the United States during this period.[39]

By 1898, LAUSD expanded to include 57 facilities and almost 400 classrooms. From this era, however, only three original schoolhouses remain. Social and political reform as well as population growth changed teaching and discipline methods and eventually, larger schools were needed to accommodate larger classroom sizes and grade separation.

Progressive Education Movement: Standardization and Expansion (1910–1933)

During this period, the American education system was profoundly influenced by the Progressive Education Movement, and public school architecture mirrored these philosophical reforms in education. These reforms included that the physical environment played a role in learning and addressing student needs as unique individuals, and reflected community needs, with spaces for students and the citizenry to gather.[40] During this

[37] ASM Affiliates, Inc. 2022. Historic Resource Evaluation Report: Irving Middle School. Prepared for Los Angeles Unified School District, Office of Environmental Health & Safety. P. 18.

[38] Sapphos Environmental, Inc. 2014. Los Angeles Unified School District Historic Context Statement, 1870 to 1969. Prepared for Los Angeles Unified School District, Office of Environmental Health and Safety.

[39] Sapphos Environmental, Inc. 2014. LAUSD Historic Resources Survey Report. Prepared for LAUSD Office of Environmental Health and Safety.

[40] Sapphos Environmental, Inc. 2014. LAUSD Historic Resources Survey Report. Prepared for LAUSD Office of Environmental Health and Safety.

era, Los Angeles County also experienced an unprecedented population boom over previous decades that overcrowded grammar schools, necessitating a second generation of educational facilities. These educational facilities focused on modernization and functionality through less monumental building designs, connection to the outdoors, cohesive groupings of structures on spread-out campuses, and construction techniques to enhance fire and seismic safety. State and federal legislation made school compulsory for teenagers, including those in the working world, driving construction of trade schools and junior colleges in Los Angeles.

Era of Reform: Great Depression, Earthquake, and Early Experiments in the Modern, Functionalist School (1933–1945)

The evolution of educational architecture in this era is characterized by modern, functional, and flexible architecture in LAUSD schools; integration of classrooms with outdoor facilities; further emphasis on the role of schools in community life; and increased sophistication of building techniques. The 1933 Long Beach earthquake left intact only those schools of the previous era built under 1927 City of Los Angeles building codes. The construction boom that followed was energized, financially and in magnitude, by the Public Works Administration (PWA) involvement. The PWA funded 70 percent of all newly constructed schools nationwide in the 1930s.[41] The PWA Moderne building design style has become synonymous with LAUSD for this era. Irving Middle School was constructed during this period in the year 1936 by the PWA. This third era continued and expanded the differentiation of spaces and buildings dedicated to different functions and site planning along with far more rigorous construction standards employing progressive technologies such as steel and glass or reinforced concrete. A "spread out" campus also was as important in this era as it was to the preceding era, with an emphasis on landscaping for outdoor gatherings and recreation between buildings that were devoted to different uses. By contrast to older, built-out East Coast cities, Los Angeles and southern California were horizontal in nature, and with more available acreage for these expansive school plants.

Educating the Baby Boom: Postwar Expansion and the Functional, Modern School (1945–1969)

During this final era, birthrates and migration after World War II resulted in shortages in housing and classrooms in California, creating demand for new residential and school construction, as well as repair and maintenance of older educational infrastructure. Architecture and campus design shifted towards democratic ideals around economical functionality, childhood welfare and development, and movement beyond the stylistic conventions of the past; the cultural context in which this took place included national standardization in education. With expansion of educational facilities to meet suburban needs in the mid-1940s and 1950s, downtown LAUSD school enrollment entered a decline. The LA Board of Education veered towards a traditional curriculum by 1945, which along with population expansion led to standardization in curricula, as well as school and campus architecture. Operable windows for light and fresh air became standard devices, and plans became "more open and interconnected, with more transparency and spatial complexity."

[41] Sapphos Environmental, Inc. 2014. LAUSD Historic Resources Survey Report. Prepared for LAUSD Office of Environmental Health and Safety.

Development of Irving Middle School

Development of Irving MS began in 1889 when Andrew Glassell (1827–1901), after whom Glassell Park is named, built a Victorian home where Irving MS is now located. Glassell and family also owned acres of land surrounding the home and used them for agricultural groves and orchards. After Andrew Glassel's death in 1901, the Glassell family began selling some of the property, leading to subdivisions in the community that is now called Glassell Park. The orchards and groves along with the surrounding areas would eventually be transformed into residential tracts made up of individually designed bungalow residences. By the 1930s, two streets and commercial properties were added, and portions of the existing school were developed on the northern portion in 1936 and 1937. The City of Los Angeles purchased the Glassell House in 1936 through eminent domain with the intent to establish Verdugo Road District Junior High School. District manager and architect Alfred S. Nibecker Jr. recommended school projects for expansion of Irving MS. Nibecker's responsibility for the new campus included the Administration Building (1937), Auditorium (1939), Gymnasium (1937), Cafeteria (1938), and Shop No. 1 and Shop No. 2 (1936-1939).[42] The Auditorium, Physical Education Building, and Administration Building were originally designed by master architect Edwin L. Bergstrom, while the Cafeteria and Shop No. 1 and Shop No. 2 were designed by Nibecker.[43] As stated in the HRER:

> The addition of new buildings, including two temporary shop buildings, was scheduled at a cost of $44,000, with Nibecker as architect. […] The architect was shown as Bergstrom, corresponding to information on the original architectural plans for the building on file at the LAUSD Vault. On the same date, a permit was issued for a Physical Education building, with Bergstrom as the architect and Laurence J. Waller as engineer. The two-story building was described as 53 by 151 feet in size.[44]
>
> A permit for the Cafeteria was issued in 1937. The building is shown in architectural drawings as containing a Students' Dining Room, Faculty Dining Room (north corner), Serving Room, Kitchen, and Dishwashing Room. Building permits for the Cafeteria and a temporary 40-by-60-foot single-story Temporary Shop Building (Shop No. 2) show Nibecker as the architect with J. E. Byers as engineer.[45]
>
> Two rectangular shop buildings were constructed southwest of the Cafeteria. The two shops are shown in architectural drawings as identical on the exterior, with the exception of an additional small window centered between the two doors at each of the northwest and southeast façades of Shop No. 2. The interior of Shop No. 1 originally was intended to house a print shop and a metal shop, side by side, each with separate entrances. The interior of Shop No. 2 was designed for side-by-side electric and wood shops, with the wood shop occupying slightly more space. A third shop building was designed by Bergstrom, along with the other original buildings on campus. The design showed a larger shop with exterior design elements echoing the other buildings and with metal, electric, and

[42] ASM Affiliates, Inc. 2022. Historic Resource Evaluation Report: Irving Middle School. Prepared for Los Angeles Unified School District, Office of Environmental Health & Safety.

[43] ASM Affiliates, Inc. 2022. Historic Resource Evaluation Report: Irving Middle School. Prepared for Los Angeles Unified School District, Office of Environmental Health & Safety. P. 16.

[44] ASM Affiliates, Inc. 2022. Historic Resource Evaluation Report: Irving Middle School. Prepared for Los Angeles Unified School District, Office of Environmental Health & Safety. P. 11.

[45] ASM Affiliates, Inc. 2022. Historic Resource Evaluation Report: Irving Middle School. Prepared for Los Angeles Unified School District, Office of Environmental Health & Safety. P. 16.

> woodworking shops under the same roof. It appears this building was not constructed but was replaced by the two extant shops (Shop No. 1 and Shop No. 2), which were designed a year later.[46]

As noted in Sections 4.1 and 4.2 of the HRER, the shops are very much part of the original setting and campus layout, a built reminder that acknowledges another necessary component in education at this time—the trades—that addressed the school's utilitarian needs. When the school officially opened in 1937, the name was changed to Washington Irving Junior High School. PWA helped buoy school construction in LAUSD through the Great Depression in the 1930's, which contributed to the inclusion of PWA Moderne architectural features and Streamline Moderne style elements in the design of these buildings[47]

In the years following the creation of the school, several nearby parcels of former single- and multi-family homes, a lumberyard, grocery stores, and other buildings were bought by the school and added to the Irving MS Campus.[48] A third Shop Building was built in 1955, the one-story Classroom and Homemaking Buildings were built in 1956, six bungalow classrooms were added to the Campus from 1947 to 1970, the two-story Classroom Building was built in 1990, and the Sanitary Building was built in 2004.[25] Additional structures have been developed onsite, and the existing structures and configuration of the site have been present since 2004.[49] Today, the Project site continues to be surrounded predominantly by multi-family residential with some single-family residential, commercial, industrial, and public facilities.

3.2.2 Regulatory Framework

State

California Environmental Quality Act

CEQA is the principal statute governing environmental review of projects occurring in the state and is codified as Public Resources Code (PRC) Section 21000 et seq. CEQA requires lead agencies to determine if a proposed project would have a significant effect on the environment, including significant effects on historical or unique archaeological resources.

Under CEQA (PRC Section 21084.1), a project that may cause a substantial adverse change in the significance of an historical resource is a project that may have a significant effect on the environment. An archaeological resource may qualify as an "historical resource" under CEQA. The CEQA Guidelines (Title 14 California Code of Regulations [CCR] Section 15064.5) recognize that an historical resource includes (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 (California Register); (2) a resource included in a local register of historical resources, as defined in PRC Section 5020.1(k) or identified as significant in a historical resource survey meeting the requirements of PRC Section 5024.1(g); and (3) any object, building, structure, site, area,

[46] ASM Affiliates, Inc. 2022. Historic Resource Evaluation Report: Irving Middle School. Prepared for Los Angeles Unified School District, Office of Environmental Health & Safety. P. 16.

[47] Sapphos Environmental, Inc. 2014. Los Angeles Unified School District Historic Context Statement, 1870 to 1969. Prepared for Los Angeles Unified School District, Office of Environmental Health and Safety.

[48] ASM Affiliates, Inc. 2022. Historic Resource Evaluation Report: Irving Middle School. Prepared for Los Angeles Unified School District, Office of Environmental Health & Safety. P. 16.

[49] NAC Architecture. February 3, 2023. Irving Steam Magnet Middle School Site Analysis and Development Report. Prepared for Los Angeles Unified School District.

place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California by the lead agency, provided the lead agency's determination is supported by substantial evidence in light of the whole record. The fact that a resource does not meet the three criteria outlined above does not preclude the lead agency from determining that the resource may be an historical resource as defined in PRC Sections 5020.1(j) or 5024.1.

If a lead agency determines that an archaeological site is a historical resource, the provisions of Section 21084.1 of CEQA and Section 15064.5 of the CEQA Guidelines apply. If a project may cause a substantial adverse change (defined as physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired) in the significance of an historical resource, the lead agency must identify potentially feasible measures to mitigate these effects (CEQA Guidelines Sections 15064.5(b)(1), 15064.5(b)(4)).

If an archaeological site does not meet the criteria for a historical resource contained in the CEQA Guidelines, then the site may be treated in accordance with the provisions of Section 21083, which is as a unique archaeological resource. As defined in Section 21083.2 of CEQA a "unique" archaeological resource is an archaeological artifact, object, or site, about which it can be clearly demonstrated that without merely adding to the current body of knowledge, there is a high probability that it meets any of the following criteria:

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

If an archaeological site meets the criteria for a unique archaeological resource as defined in Section 21083.2, then the site is to be treated in accordance with the provisions of Section 21083.2, which state that if the lead agency determines that a project would have a significant effect on unique archaeological resources, the lead agency may require reasonable efforts be made to permit any or all of these resources to be preserved in place (Section 21083.1(a)). If preservation in place is not feasible, mitigation measures shall be required. The CEQA Guidelines note that if an archaeological resource is neither a unique archaeological nor a historical resource, the effects of the project on those resources shall not be considered a significant effect on the environment (CEQA Guidelines Section 15064.5(c)(4)).

A significant effect under CEQA would occur if a project results in a substantial adverse change in the significance of a historical resource as defined in CEQA Guidelines Section 15064.5(a). Substantial adverse change is defined as "physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of a historical resource would be materially impaired" (CEQA Guidelines Section 15064.5(b)(1)). According to CEQA Guidelines Section 15064.5(b)(2), the significance of a historical resource is materially impaired when a project demolishes or materially alters in an adverse manner those physical characteristics that:

A. Convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register; or

B. Account for its inclusion in a local register of historical resources pursuant to section 5020.1(k) of the

Public Resources Code or its identification in a historical resources survey meeting the requirements of section 5024.1(g) of the Public Resources Code, unless the public agency reviewing the effects of the project establishes by a preponderance of evidence that the resource is not historically or culturally significant; or

C. Convey its historical significance and that justify its eligibility for inclusion in the California Register as determined by a Lead Agency for purposes of CEQA.

California Register of Historical Resources

The California Register is "an authoritative listing and guide to be used by state and local agencies, private groups, and citizens in identifying the existing historical resources of the state and to indicate which resources deserve to be protected, to the extent prudent and feasible, from substantial adverse change" (PRC Section 5024.1[a]). The criteria for eligibility for the California Register are based upon the National Register of Historic Places (National Register) criteria (PRC Section 5024.1[b]). Certain resources are determined by the statute to be automatically included in the California Register, including California properties formally determined eligible for, or listed in, the National Register.

To be eligible for the California Register, a prehistoric or historic-period property must be significant at the local, state, and/or federal level under one or more of the following four criteria:

1. Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;

2. Is associated with the lives of persons important in our past;

3. Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or

4. Has yielded, or may be likely to yield, information important in prehistory or history.

A resource eligible for the California Register must meet one of the criteria of significance described above and retain enough of its historic character or appearance (integrity) to be recognizable as a historical resource and to convey the reason for its significance. It is possible that a historic resource may not retain sufficient integrity to meet the criteria for listing in the National Register, but it may still be eligible for listing in the California Register. Additionally, the California Register consists of resources that are listed automatically and those that must be nominated through an application and public hearing process. The California Register automatically includes the following:

- California properties listed on the National Register and those formally determined eligible for the National Register;

- California Registered Historical Landmarks from No. 770 onward; and

- Those California Points of Historical Interest that have been evaluated by the California Office of Historic Preservation (OHP) and have been recommended to the State Historical Commission for inclusion on the California Register.

Other resources that may be nominated to the California Register include:

- Historical resources with a significance rating of Category 3 through 5 (those properties identified as eligible for listing in the National Register, the California Register, and/or a local jurisdiction register);
- Individual historical resources;
- Historical resources contributing to historic districts; and
- Historical resources designated or listed as local landmarks, or designated under any local ordinance, such as a historic preservation overlay zone.

Local

City of Los Angeles General Plan

The City of Los Angeles General Plan (adopted 2001) states as its objective, to "protect the city's archaeological and paleontological resources for historical, cultural, research, and/or educational purposes" by continuing "to identify and protect significant archaeological and paleontological resources known to exist or that are identified during land development, demolition, or property modification activities."

In addition, the City will:

> *continue to protect historic and cultural sites and/or resources potentially affected by proposed land development, demolition, or property modification activities … The city's environmental guidelines require the applicant to secure services of a bona fide archaeologist to monitor excavations or other subsurface activities associated with a development project in which all or a portion is deemed to be of archaeological significance. Discovery of archaeological materials may temporarily halt the project until the site has been assessed, potential impacts evaluated and, if deemed appropriate, the resources protected, documented and/or removed.*

Los Angeles Municipal Code

The Los Angeles Municipal Code (LAMC) Section 91.106.4.5 states that the Building Department "shall not issue a permit to demolish, alter or remove a building or structure of historical, archaeological or architectural consequence if such building or structure has been officially designated" by a federal, state, or local authority.

Los Angeles Unified School District Subsequent Program EIR

The 2023 SPEIR was certified by LAUSD on December 23, 2023, an update to the SUP (SUP Program EIR certified by the Board on November 10, 2015), to integrate both the Measure RR funding and priorities into its operational framework, and to integrate the Measure RR Implementation Plan to help guide the identification of sits and development of project proposals.[50] The overall purpose of the EIR was to inform LAUSD (lead agency), responsible agencies, decision makers, and the general public of the potential

[50] Los Angeles Unified School District. 2023. Subsequent Program EIR for the School Upgrade Program. http://achieve.lausd.net/ceqa

environmental effects from implementation of the SUP, and to streamline future CEQA compliance. The 2023 SPEIR includes Standard Conditions (SCs) to provide sufficient performance standards for future projects to reduce environmental impacts. The following SCs are applicable to historical, archaeological, and paleontological resources (**Table 3.2-1, *Cultural Resources Standard Conditions of Approval***).

TABLE 3.2-1
CULTURAL RESOURCES STANDARD CONDITIONS OF APPROVAL

Applicable SC	Description
SC-CUL-1	**Historic Architect** For projects involving structural upgrades to historic resources, the Design Team shall include a qualified Historic Architect with demonstrated project-level experience in historic projects. For campuses with qualifying historical resources under CEQA, the Design Team shall include a LAUSD-qualified Historic Architect. The Historic Architect/s shall meet the Secretary of the Interior's Professional Qualifications Standards and the standards described on page 8 of the LAUSD Design Guidelines and Treatment Approaches for Historic Schools. Throughout the project design progress the Historic Architect shall provide input to ensure compliance with the Secretary of the Interior's Standards for the Treatment of Historic Properties and LAUSD requirements and guidelines for the treatment of historical resources. Role of the Historic Architect The tasks of the Historic Architect on the Design Team shall include, but are not limited to: • The Historic Architect shall work with the Design Team (including the Structural Engineer) and LAUSD to ensure that project components, including new construction and modernization of existing facilities, comply with the Secretary of the Interior's Standards for the Treatment of Historic Properties and LAUSD Design Guidelines and Treatment Approaches for Historic Schools. The Historic Architect shall work with the Design Team and LAUSD throughout the design process to develop project options that facilitate compliance with the applicable historic preservation standards. • For new construction, the Historic Architect shall work with the Design Team and LAUSD to identify options and opportunities for: (1) ensuring compatibility of scale and character for new construction, site and landscape features, and circulation corridors, and (2) ensuring that new construction is designed and sited in such a way that reinforces and strengthens, as much as feasible, character-defining site plan features, landscaping, and circulation corridors throughout campus. • For modernization and upgrade projects involving contributing (significant) buildings or features, the Historic Architect shall work with the Design Team and LAUSD to ensure that specifications for design and implementation of projects comply with the applicable historic preservation standards. • The Historic Architect shall participate in Design Team meetings during all phases of the project through 100% construction drawings, pre-construction, and construction phases, as applicable. • The Historic Architect shall prepare a memo at the 50% and at the 100% construction drawings stages, demonstrating how principal project components and treatment approaches comply with applicable historic preservation standards, including the Secretary of the Interior's Standards for the Treatment of Historic Properties and LAUSD Design Guidelines and Treatment Approaches for Historic Schools. The memos shall be submitted to LAUSD OEHS for review. • The Historic Architect shall participate in pre-construction and construction monitoring activities, as appropriate, to ensure continuing conformance with Secretary's Standards and/or avoidance of a material impairment of the historical resources. • The Historic Architect shall provide specifications for architectural features or materials requiring restoration or removal, maintaining and protecting relevant features in place, or on-site storage. Specifications shall include detailed drawings or instructions where historic features may be impacted. • The Design Team and Historic Architect shall be responsible for incorporating LAUSD's recommended updates and revisions during the design development and review process.
SC-CUL-2	LAUSD shall follow the guidelines outlined in these documents to the maximum extent practicable when planning and implementing projects and adjacent new construction involving

TABLE 3.2-1
CULTURAL RESOURCES STANDARD CONDITIONS OF APPROVAL

Applicable SC	Description
	historical resources. The Design Team, Historic Architect, and Construction Contractor shall apply LAUSD School Design Guide and LAUSD Design Guidelines and Treatment Approaches for Historic Schools and the Secretary's Standards for all new construction and modernization projects. In keeping with the District's adopted policies and goals, historical resources shall be reused rather than destroyed, where feasible. General guidelines include: • Retain and preserve the character of historic resources. • Repair rather than remove, replace, or destroy character-defining features; if replacement is necessary, replace in-kind to match materials, dimensions, and appearance. • Treat distinctive architectural features or examples of skilled craftsmanship that characterize a building with sensitivity. • Where practical, conceal reinforcement required for structural stability or the installation of life safety or mechanical systems. • Where necessary to halt deterioration and after the preparation of a condition assessment, undertake surface cleaning, preparation of surfaces, and other projects involving character-defining features using the least invasive, gentlest means possible. Avoid using any abrasive materials or methods including sandblasting and chemical treatments.
SC-CUL-3	Prior to any major alteration to or adjacent to a historic resource that may potentially damage historic resources (or previously identified historic features), the Historic Architect shall develop a Temporary Protection Plan that identifies potential risks to the historic resource. The Temporary Protection Plan shall be prepared in coordination with the Construction Contractor and LAUSD prior to demolition or construction. The Temporary Protection Plan may include, but not be limited to, the following components: • Notation of the historic resource on construction plans. • Pre-construction survey to document the existing physical condition of the historic resource. • Procedures and timing for the placement and removal of temporary protection features, around the historic resource. • Monitoring of the installation and removal of temporary protection features by the Historic Architect, or designee. • Post-construction survey to document the condition of the historic resource after Project completion. • Preparation of a technical memorandum documenting the pre-construction and post-construction conditions of the historic resource and compliance with protective measures outlined Temporary Protection Plan.
SC-CUL-4	Prior to significant alteration or demolition of a historical resource, LAUSD shall retain an Architectural Photographer and/or a Historian or Architectural Historian who meet the Secretary of the Interior's Professional Qualifications Standards and who shall prepare a HABS-like Historic Documentation Package (Package). The Package shall include photographs and descriptive narrative. Documentation will draw upon primary- and secondary-source research including available studies prepared for the property (measured drawings are not required). The specifications for the Package include: • **Photographs:** Photographic documentation shall focus on the historical resources/features proposed to be significantly altered or demolished, with overview and context photographs for the campus and adjacent setting. A professional-quality camera will be used to take photographs of interior and exterior features of the buildings. Photographs will include context views, elevations/exteriors, architectural details, overall interiors, and interior details (if warranted). Digital photographs will be in black and white (as well as in color or as requested by the District) and provided in an electronic format. • **Descriptive and Historic Narrative:** The Historian or Architectural Historian shall prepare descriptive and historic narrative of the historical resources/features. Physical descriptions will detail each resource, elevation by elevation, with accompanying

TABLE 3.2-1
CULTURAL RESOURCES STANDARD CONDITIONS OF APPROVAL

Applicable SC	Description
	photographs and information on how the resource fits within the broader campus during its period of significance. The historic narrative will include available information on the campus design, history, architect/contractor/designer as appropriate, history of the area, and historic context. In addition, the narrative will include a methodology section specifying the name of researcher, date of research, and sources/archives visited, as well as a bibliography. Within the written history, statements shall be footnoted as to their sources, where appropriate. • **Historic Documentation Package Submittal:** Upon completion of the descriptive and historic narrative, all materials will be compiled in electronic format and presented to LAUSD for review and comment. Upon approval, one electronic copy and one hard copy shall be submitted to LAUSD OEHS. Photographs will be individually labeled and provided to LAUSD in electronic format.
SC-CUL-5	LAUSD shall comply with Design Specification 01 3591, Historic Treatment Procedures, as applicable. This Specification requires the Construction Contractor to submit a Historic Treatment Plan to the District for the protection, repair, and replacement of historic materials and features.
SC-CUL-6	LAUSD shall retain a qualified Archaeologist to be available on-call. The Archaeologist shall meet the Secretary of the Interior's Professional Qualifications Standards (48 Federal Register 44738–39). The archaeologist must have knowledge of both prehistoric and historical archaeology. To reduce impacts to previously undiscovered buried archaeological resources, following completion of the final grading plan and prior to any ground disturbance, a qualified archaeologist shall prepare an Archaeological Monitoring Program as described under SC-CUL-7.
SC-CUL-7	The Construction Contractor shall halt construction activities within a 30 foot radius of the find and shall notify the LAUSD. • LAUSD shall retain an Archaeologist that meets the Secretary of the Interior's Professional Qualifications Standards (48 Federal Register 44738–39). The archaeologist must have knowledge of both prehistoric and historical archaeology. • The Archaeologist shall have the authority to halt any project-related construction activities that could impact potentially significant resources. • The Archaeologist shall be afforded the necessary time to recover and assess the find. Ground-disturbing activities shall not continue until the discovery has been assessed by the Archaeologist. With monitoring, construction activities may continue on other areas of the project site during evaluation and treatment of historic or unique archaeological resources. • If the find is determined to be of value, the Archaeologist shall prepare an Archaeological Monitoring Program and shall monitor the remainder of the ground-disturbing activities. • Significant archaeological resources found shall be curated as determined necessary by the Archaeologist and offered to a local museum or repository willing to accept the resource. • Archaeological reports shall be submitted to the South Central Coastal Information Center at the California State University, Fullerton. • The Archaeological Monitoring Plan shall include: o Extent and duration of the monitoring based on the grading plans o At what soil depths monitoring of earthmoving activities shall be required o Location of areas to be monitored o Types of artifacts anticipated o Procedures for temporary stop and redirection of work to permit sampling, including anticipated radius of suspension of ground disturbances around discoveries and duration of evaluation of discovery to determine whether they are classified as unique or historical resources o Procedures for maintenance of monitoring logs, recovery, analysis, treatment, and curation of significant resources o Procedures for archaeological resources sensitivity training for all construction

TABLE 3.2-1
CULTURAL RESOURCES STANDARD CONDITIONS OF APPROVAL

Applicable SC	Description
	workers involved in moving soil or working near soil disturbance, including types of archaeological resources that might be found, along with laws for the protection of resources. The sensitivity training program shall also be included in a worker's environmental awareness program that is prepared by LAUSD with input from the Archaeologist, as needed. o Accommodation and procedures for Native American monitors, if required. o Procedures for discovery of Native American cultural resources. • The construction manager shall adhere to the stipulations of the Archaeological Monitoring Plan.
SC-CUL-8	Cultural resources sensitivity training shall be conducted for all construction workers involved in ground-disturbing activities. This training shall review the types of archaeological resources that might be found, along with laws for the protection of resources and shall be included in a worker's environmental awareness program that is prepared by LAUSD with input from a qualified Archaeologist, as needed.
SC-CUL-9	LAUSD shall determine whether it is feasible to prepare and implement a Phase III Data Recovery/Mitigation Program. If feasible, the Archaeologist shall prepare a Phase III Data Recovery/Mitigation Program to outline procedures to recover a statistically valid sample of the archaeological remains and to document the site and reduce impacts to be less than significant. All documentation shall be prepared in the standard format of the ARMR Guidelines, as prepared by the OHP. Once a Phase III Data Recovery/Mitigation Program is completed, an Archaeological Monitor shall be present to oversee the ground-disturbing activities to ensure that construction proceeds in accordance with the Program.
SC-CUL-10	All work shall stop within a 30-foot radius of the discovery. Work shall not continue until the discovery has been evaluated by a qualified Archaeologist and the local Native American representative has been contacted and consulted to assist in the accurate recordation and recovery of the resources.
SC-CUL-11	LAUSD shall retain a Paleontological Monitor to oversee specific ground-disturbing activities as determined by the scope of work and final grading plan. The Monitor shall provide the construction crew(s) with a brief summary of the sensitivity, the rationale behind the need for protection of these resources, and information on the initial identification of paleontological resources. If paleontological resources are uncovered, the Construction Contractor shall halt construction activities within a 30 foot radius of the find and shall notify the LAUSD. • Ground-disturbing activities shall not continue until the discovery has been assessed by the Paleontologist. • The paleontologist shall have the authority to halt construction activities to allow a reasonable amount of time to identify potential resources. • Significant resources found shall be curated as determined necessary by the Paleontologist.

3.2.3 Thresholds of Significance

According to Appendix G of the State CEQA Guidelines, the proposed Project could have a potentially significant impact with respect to cultural resources if it would:

a) Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5.

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

c) Disturb any human remains, including those interred outside of formal cemeteries.

Criteria (b) and (c) were determined to result in less than significant impacts by the Initial Study (**Appendix 1**) and, therefore, are not carried forward for analysis in the EIR.

3.2.4 Methodology

An HRTR was prepared by architectural historians who meet the Secretary of the Interior's *Professional Qualifications Standards* in the fields of History and Architectural History (see **Appendix 5**). Prior to the commencement of field investigations, previous documentation of historic resources in the City of Los Angeles was reviewed, including the LAUSD HCS, historic resource surveys, and survey report for the Northeast Los Angeles Community Plan Area (CPA), databases and historic newspapers, Los Angeles County Assessor's Maps, Los Angeles Zoning Information Map Access Systems (ZIMAS), and Sanborn Maps. In addition, the listings for the City of Los Angeles in the California Historical Resources Inventory, which is maintained by the Office of Historic Preservation (OHP) in Sacramento and available through the South Central Coastal Information Center (SCCIC) in the Department of Anthropology at California State University at Fullerton, were examined. Site-related correspondence from OHP to the City of Los Angeles, provided by LAUSD, was taken into account. Additional research on the history of the City and the development of the CPA was undertaken using a variety of online sources.

On December 18, 2023, Sapphos Environmental, Inc. (Dr. Graham Larkin) performed a field inspection of the proposed project site. Each building on the Irving MS Campus was inspected and digitally photographed from the public right-of-way. A table listing each property with its date of construction, obtained from the Los Angeles County Tax Assessor, was compiled. Initial determinations of potential historical significance were made, based on the age, integrity, architectural character, and historical context of each building. Site-specific research was performed. Potential resources were evaluated using the criteria of significance for the National Register of Historic Places (NRHP) and the California Register of Historical Resources (CRHR), and California Historical Resource status codes were assigned, indicating whether or not each property was eligible for listing.

3.2.5 Impact Analysis

Impact 3.2-1: The Project would result in a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5.

The Campus is eligible for federal, state, or local, designation and is considered to be a historical resource for the purpose of CEQA.[51] Irving MS was given a status code of 3S, or recommended eligible for listing in the NRHP as a historic district, through survey evaluation.[52] The district is comprised of six contributor buildings, namely, the Administration Building, Auditorium, Physical Education Building, Cafeteria, Shop No. 1, and Shop No. 2, all built from 1937 to 1939 and all associated with the themes identified as significant

[51] ASM Affiliates, Inc. 2022. Historic Resource Evaluation Report: Irving Middle School. Prepared for Los Angeles Unified School District, Office of Environmental Health & Safety. P. 16.

[52] Heumann, Leslie, & Associates, and Anne Doehne. 2002. Historic Schools of the Los Angeles Unified School District. Science Applications International Corporation, a presentation prepared for LAUSD Facilities Services Division.

within the themes of the PWA Moderne style and LAUSD, Post-1933 Long Beach Earthquake School Plants, 1933–1945 (see Table 3.2-2, *HRER Historic District Eligibility: Recommended Contributors to the Washington Irving Middle School District*).[53] None of the six contributors to the eligible historic district are individually eligible historic resources.

TABLE 3.2-2
HRER HISTORIC DISTRICT ELIGIBILITY:
RECOMMENDED CONTRIBUTORS TO THE WASHINGTON IRVING MIDDLE SCHOOL DISTRICT

Building Name	Year Designed/ Constructed	Architect	Contributor to Eligible Historic District?	Individually Eligible?	NRHP and CRHR Criteria	California SHPO Status
Administration	1936/1937	Bergstrom	Yes	No	A/1 and C/3	3D
Auditorium	1939	Bergstrom	Yes	No	A/1 and C/3	3D
Physical Education	1936/1937	Bergstrom	Yes	No	A/1 and C/3	3D
Cafeteria	1937	Nibecker	Yes	No	A/1 and C/3	3D
Shop No. 1	1937	Nibecker	Yes	No	A/1	3D
Shop No. 2	1937	Nibecker	Yes	No	A/1	3D

Source: HRER (Appendix 1-B), Table 1, *Recommended Contributors/Noncontributors to the Washington Irving Middle School Historic District*.

Note: SHPO = State Historic Preservation Officer.

A/1: Events; associated with events that have made a significant contribution to the broad patterns of history. The Washington Irving Middle School Historic District exemplifies school planning, design, and earthquake-resistant construction under the theme of LAUSD, Post-1933 Long Beach Earthquake School Plants.

C/3: Architecture; embodies the distinctive characteristics of a type, period, or method of construction, or that represents the work of a master, or that possesses high artistic values, or that represents a significant and distinguishable entity whose components may lack individual distinction. Irving MS was described in the HRER as an excellent intact example of PWA Moderne architecture applied to a middle school campus, and an important example of the work of Los Angeles Architect Edwin L. Bergstrom. For Irving MS, he worked with District Architect Alfred S. Nibecker, Jr.

3D: Appears eligible for National Register (NR) as a contributor to a NR eligible multi-component resource through survey evaluation.

An HRTR has been prepared as part of the Draft EIR that evaluates the potential for implementation of the Project to substantially change the significance of an identified historical resource (see **Appendix 5**). As discussed therein, the proposed Project includes the demolition of the Administration Building, a PWA Moderne building at the focal point of the 1930s campus. It is approximately 35 feet away from the Auditorium, approximately 45 feet away from the Physical Education Building, and approximately 50 feet away from the Cafeteria, and it is stylistically integrated with all three of those buildings. It is approximately 125 feet away from the nearest corner of Shop No. 1 and Shop No. 2, which are less stylistically distinctive but are nonetheless a coherent part of the 1930s campus and the resulting historic district.

Although none of the six PWA-era buildings are individually eligible as a historic landmark, together they are worth more than the sum of their parts. Each of them is a historic district contributor—part of a "varied collection of buildings, differentiated by function and use" as indicated in the above-stated eligibility criteria.

[53] Sapphos Environmental, Inc. 2014. Los Angeles Unified School District Historic Context Statement, 1870 to 1969. Prepared for Los Angeles Unified School District, Office of Environmental Health and Safety.

Demolition of the Administration Building would result in a less than significant impact, based on California Register eligibility criteria, because the remaining five PWA-era buildings would, with application of LAUSD SCs and appropriate mitigation measures, continue to maintain sufficient collective coherence, and sufficient integrity of *location, design, setting, materials, workmanship, feeling,* and *association*, to constitute a regionally important historic district. In short, the five buildings would continue to function as key elements of a historic campus. Although the remaining buildings would retain regional significance as a District, in the absence of the Administration Building, the PWA-era Campus would not rise to the level of national significance. Based on National Register eligibility criteria, demolition of the Administration Building would result in a significant impact because, without this central component, the historic district would no longer constitute a fully intact and exemplary PWA Moderne campus core. Due to removal of the Administration Building from the historic district, a significant and unavoidable impact to this historic resource would occur because the remaining five PWA-era buildings would no longer maintain sufficient collective coherence and sufficient integrity of *location, design, setting, materials, workmanship, feeling,* and *association*, to rise to the level of an NRHP eligible historic district.

As required by **SC-CUL-1** and **SC-CUL-2**, a qualified Historic Architect will be part of the design team to ensure that the Project would be designed in compliance with the Secretary of Interior's Standards for the Treatment of Historic Properties (SOI Standards) and LAUSD Design Guidelines and Treatment Approaches for Historic Schools. Any new construction would comply with SOI Standards to be compatible with the size, scale, and height of the remaining contributing buildings and landscape features and would not destroy spatial relationships that characterize the historic district. Per **SC-CUL-3** (and further defined by **SC-N-7**), a Temporary Protection Plan will be prepared to protect the five remaining PWA-era contributors to the historic district during construction. **SC-CUL-4** requires that the Administration Building be properly photo-documented prior to demolition. **SC-CUL-5** requires the construction contractor to submit a Historic Treatment Plan to protect, repair, and replace historic materials and features, as required by LAUSD Design Specification 01 3591. This includes provisions to reuse or display salvage materials and features that may have historic significance.

MM-CUL-1 requires the provision of an Interpretive Program that contains information regarding the history of the Irving MS campus, and specifically the Administration Building. Potential elements of such an Interpretive Program could include:

- Physical exhibit located on the Irving MS Campus. Potential location of an exhibit could be in the new construction building that will replace the demolished Administration Building, or potentially an Interpretive Garden or landscape/hardscape feature that is placed in the location of the demolished Administration Building. Historical salvage materials may be incorporated or displayed as part of the exhibit.
- Creation of a brochure or website that includes both text and historical images of the Irving MS Campus, including the Administration Building.

Significance Determination

Potentially Significant

Mitigation Measures

MM-CUL-1. To communicate information on the historic development and character of Irving MS, including the Administration Building, an Interpretative Program shall be developed and implemented. This Interpretive Program shall be accessible to the general public and include information on the history and architecture of the Campus (both exterior and interior), from the founding of the City (1781, incorporated 1850) until 1939, when the contributing buildings were completed. A historical architect, historian, or architectural historian who meets the Secretary of the Interior's professional qualifications shall be engaged to research and write the information to be provided in the Interpretive Program. The Interpretive Program shall be initiated within 1 year of the approval of the proposed Project and shall be completed by substantial completion of construction.

Significance after Mitigation

Significant and Unavoidable. Following implementation of the LAUSD SCs and MM-CUL-1, the impact of the proposed Project on historic resources would result in a less than significant impact based on California Register eligibility criteria. However, as discussed above, even after application of implementation of SCs and MM-CUL-1, demolition of the Administration Building would result in a significant and unavoidable impact with respect to the National Register eligibility criteria. This is discussed further in Chapter 4, Section 4.3, *Significant Environmental Effects That Cannot Be Avoided if The Project Is Implemented.*

3.2.6 Cumulative Impacts

The proposed Project includes the demolition of the Administration Building, an action that would invalidate the eligibility of the Campus as a historic district on the national level, but not on the state level. Although the Administration Building is a key example of PWA Moderne architecture on the Campus, subsequent to its demolition, the five remaining historic buildings would remain in place and would continue to convey the historic significance of the district.

The proposed Project is one of several school modernization projects evaluated in the 2023 SPEIR. The Project site is one of dozens of intact examples of this property type in the communities surrounding Irving MS, which include Aldama Elementary School, Eagle Rock Elementary School, Glassell Park Elementary School, Lincoln High School, and Nightingale Middle School. There are no projects planned at these campuses or any similar campuses that would result in a significant and unavoidable impact to those historical resources at this time. The loss of the Administration Building from the Washington Irving Middle School Historic District would constitute a less than significant cumulative impact on this resource type. Therefore, the proposed project would not substantially contribute to a significant cumulative impact.

Significance Determination

Less than Significant.

Mitigation Measures

No mitigation measures are required.

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3.3 Greenhouse Gas Emissions

This section evaluates potential impacts related to greenhouse gas (GHG) emissions that would result from the proposed Project. This analysis describes the existing conditions in the proposed Project area, regulatory framework, thresholds of significance, methodology, and whether the Project would generate GHG emissions that may have a significant impact on the environment or conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions. Details regarding the GHG analysis are provided in **Appendix 6, *Emissions Calculations,*** of this Draft EIR.

3.3.1 Environmental Setting

GHG emissions refer to a group of emissions generally believed to affect global climate conditions, which include carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), sulfur hexafluoride (SF_6), black carbon (black carbon is the most strongly light-absorbing component of particulate matter emitted from burning fuels such as coal, diesel, and biomass), and water vapor. The dominant human activities that contribute to GHGs are electricity production and vehicular emissions. Specifically, vehicular 'tailpipe emissions' are tracked by the United States Environmental Protection Agency (U.S. EPA); per year, the typical passenger vehicle emits roughly 4.6 metric tons of carbon dioxide equivalent (CO_2e) but is dependent on the type of fuel used, fuel economy, and annual miles driven.[1] GHG atmospheric concentrations have risen based on these two emission sources, and many scientists have argued that these gaseous concentrations have been causing Earth's temperature to rise. Consequently, this phenomenon is expected to alter rainfall patterns, reduce polar ice caps, lead to sea-level rise, and contribute to a diverse array of impacts to biodiversity and humans across the globe.

SCAG's Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), Connect SoCal, aims to create a course to closely integrate land use, transportation, and technology to achieve a more sustainable growth pattern in certain areas of the region. The Project site is within the SCAG Metropolitan Planning Organization (MPO), which is currently on track to meet target GHG emissions reduction goals. Connect SoCal encourages integrated planning for land use and transportation to achieve specific federal air quality standards. California law requires the region to reduce per capita GHG emissions in the SCAG region by 8 percent by 2020—compared with 2005 levels—and by 19 percent by 2035.[2] The strategies, programs, and projects outlined in Connect SoCal are projected to result in GHG emissions reductions in the SCAG region that meet or exceed these targets.

The Project site is located within an urbanized location and in close proximity to high-density residential development and commercial areas. Existing conditions at the proposed Project site entail a developed middle school in the northern end of Los Angeles. Existing GHG emissions are generated from energy use, indirectly from purchased electricity use and directly through fuel consumed for building heating; and area sources, from landscaping equipment used on site for maintenance, consumer products, and architectural coating. Mobile source emissions typically associated with the current facilities include vehicle trips from parents dropping off their children, buses, and school employees travelling to and from the proposed Project site. The City of Los

[1] U.S. Environmental Protection Agency. August 2023. Greenhouse Gas Emissions from a Typical Passenger Vehicle. https://www.epa.gov/greenvehicles/greenhouse-gas-emissions-typical-passenger-vehicle

[2] Southern California Association of Governments. April 2024. Connect SoCal: A Plan for Navigating to a Brighter Future. https://scag.ca.gov/sites/main/files/file-attachments/23-2987-connect-socal-2024-final-complete-040424.pdf?1714175547

Angeles has developed both community and municipal GHG emissions inventories, which include a summary of the City's emissions from each sector between 2008 and 2022.[3] In 2022, power generation was found to account for at least 93 percent of overall municipal GHG emissions in the City, followed by solid waste consumption.

According to the California Greenhouse Gas Emissions Report for 2000 to 2021,[4] emissions from statewide emitting activities in 2021 were 381.3 million metric tons of carbon dioxide equivalent ($MMTCO_2e$), which is 12.6 $MMTCO_2e$ higher than 2020 levels. Per capita GHG emissions in California have dropped from a 2001 peak of 13.8 metric tons per person to 9.7 metric tons per person in 2021, a 30.0 percent decrease. Overall trends in the inventory also demonstrate that the carbon intensity of California's economy (the amount of carbon pollution per million dollars of gross domestic product) is declining. From 2000 to 2021, the carbon intensity of California's economy has decreased by 50.8 percent from 2000 emissions, while California's gross domestic product has simultaneously increased by 67.9 percent.

3.3.2 Regulatory Framework

Federal

Greenhouse Gas Reporting Program (GHGRP)

The U.S. EPA adopted the GHGRP (40 Code of Federal Regulations [CFR] Part 98), a mandatory GHG reporting rule in September 2009. The rule requires suppliers of fossil fuels or entities that emit industrial GHGs, manufacturers of vehicles and engines, and facilities that emit 25,000 metric tons or more per year of GHG emissions to submit annual reports to the U.S. EPA beginning in 2011 (covering the 2010 calendar year emission). Vehicle and engine manufacturers were required to begin reporting GHG emissions for model year 2011. In January 2012, U.S. EPA made the first year of GHGRP reporting data available to the public through its interactive Data Publication Tool, called Facility Level Information on Greenhouse gases Tool (FLIGHT). The U.S. EPA will continue to update the tool and release additional data each reporting year.[5]

United States Climate Alliance

The United States Climate Alliance was formed on June 1, 2017, by the governors of Washington, New York, and California. The Alliance is a bipartisan coalition of governors and unincorporated self-governing territories in the United States that are committed to upholding the Paris Agreement's goal of keeping temperature increases below 1.5 degrees Celsius. Alliance commitments include reducing collective net GHG emissions at least 26 to 28 percent from 2005 levels by 2025 and 50 to 52 percent from 2005 levels by 2030. The Alliance also seeks to achieve overall net-zero GHG emissions no later than 2050. As of August 2019, the Alliance has 24 members, including the state of California.

[3] City of Los Angeles. February 2024. 2022 Community and Municipal Greenhouse Gas Inventory Report. https://clkrep.lacity.org/onlinedocs/2022/22-1402_rpt_BOS_02-14-24.pdf

[4] California Air Resources Board. December 2023. California Greenhouse Gas Emissions for 2000 to 2021; Trends of Emissions and Other Indicators. https://ww2.arb.ca.gov/sites/default/files/2023-12/2000_2021_ghg_inventory_trends.pdf

[5] U.S. Environmental Protection Agency. 2023. Learn About the Greenhouse Gas Reporting Program (GHGRP). https://www.epa.gov/ghgreporting/learn-about-greenhouse-gas-reporting-program-ghgrp

President's Executive Order 14008 (Justice 40)

Executive Order 14008 was signed into law on January 27, 2021, by President Biden. This order builds on federal actions to place climate change at the forefront of foreign policy and national security planning, including a submission for the United States to rejoin the Paris Agreement. This order includes the Justice40 initiative, which aims to enact a federal approach toward advancing environmental justice by allocating 40 percent of the benefits accrued from certain federal programs that cover investment areas such as climate change, clean energy, and clean transportation.[6]

President's Executive Order 14037

Executive Order 14037 was signed into law on August 5, 2021, by President Biden. This order aims to bolster federal policy in the domestic market in reducing greenhouse gas emissions through a goal to designate 50 percent of new passenger cars and light trucks as zero-emission vehicles by 2030.[7]

Infrastructure Investment and Jobs Act

The Infrastructure Investment and Jobs Act was signed into law on November 15, 2021, by President Biden. This law provides billions of dollars to support a historic and diverse array of infrastructure investments while driving the creation of union jobs and supporting a more sustainable and equitable economy. This law includes initiatives to help tackle the climate crisis and reduce GHG emissions, including (but not limited to):[8]

- Investing in public transportation to expand transit options, improve accessibility, and replace thousands of deficient transit vehicles with zero emission vehicles.
- Building a network of electric vehicle (EV) chargers to accelerate EV adoption.
- Upgrading power infrastructure to deliver clean energy across the country and facilitate the deployment of new energy technologies to support the transition to a zero-emissions economy.

Corporate Average Fuel Economy Standards

The U.S. EPA regulates and tests gas mileage or fuel economy in order to deter air pollution in the United States. Since the transportation sector produces 28 percent[9] of GHG emissions in the U.S. as a whole, fuel economy regulations are an important way to reduce GHG emissions. The US EPA's Corporate Average Fuel Economy (CAFE) standards require vehicle manufacturers to comply with the gas mileage or fuel economy standards to reduce energy consumption by increasing the fuel economy of cars and light trucks. The most

[6] The White House. July 2021. Interim Implementation Guidance for the Justice40 Initiative. https://www.whitehouse.gov/wp-content/uploads/2021/07/M-21-28.pdf#:~:text=In%20Executive%20Order%2014008%2C1%20the%20President%20directed%20the,flow%20to%20disadvantaged%20communities%20%E2%80%93%20the%20Justice40%20Initiative.

[7] Federal Register. August 10, 2021. Executive Order 14037 – Strengthening American Leadership in Clean Cars and Trucks. https://www.federalregister.gov/documents/2021/08/10/2021-17121/strengthening-american-leadership-in-clean-cars-and-trucks

[8] The White House. November 2021. Fact Sheet: The Bipartisan Infrastructure Deal. https://www.whitehouse.gov/briefing-room/statements-releases/2021/11/06/fact-sheet-the-bipartisan-infrastructure-deal/

[9] U.S. Environmental Protection Agency. 2023. Sources of Greenhouse Gas Emissions. https://www.epa.gov/ghgemissions/sources-greenhouse-gas-emissions

recent CAFE GHG emissions standards were set in 2022, which will increase the fuel economy to at a rate of 8 percent per year for cars and light trucks by Model Year 2024–2025.[10]

Infrastructure Reduction Act

The Infrastructure Reduction Act was signed into law on August 16, 2022, by President Biden. This law provides billions of dollars to support incentives, grants, and loans toward new investments in infrastructure, including clean energy, transportation, and the environment.[11] The law, when implemented with the strategies of the Build Back Better Framework, aims to meet the president's U.S. GHG emissions reduction commitment of 50 to 52 percent from 2005 levels by 2030, create a 100 percent carbon-free power sector by 2035, and accomplish a net-zero economy by 2050.[12]

State

Renewable Portfolio Standards (RPS)

California's RPS, established in 2002 by the California State Senate in Senate Bill (SB) 1078, accelerated in 2006 and expanded in 2011, is one of the most ambitious renewable energy standards in the country. The RPS requires each energy provider to supply 33 percent of their electricity from eligible renewable energy resources by 2020. Signed in October 2015, SB 350 requires providers to supply 50 percent of their electricity from eligible renewable energy resources by 2030.

Governor's Executive Order S-3-05 (EO S-3-05)

Executive Order S-3-05 (EO S-3-05) issued in 2005 recognizes California's vulnerability to increased temperatures causing human health impacts, rising sea levels, and a reduced Sierra snowpack due to a changing climate. The EO established targets to reduce GHG emissions to 2000 levels by 2010, to 1990 levels, and by 2050, 80 percent below 1990 levels.[13]

Global Warming Solutions Act of 2006 (AB 32)

The Global Warming Solutions Act of 2006 (Assembly Bill 32, or AB 32) codifies the targets set in EO S-3-05 of statewide reductions to 1990 emissions levels by 2020. AB 32 directs CARB to develop and implement a scoping plan and regulations to meet the 2020 target. CARB approved the Scoping Plan in 2008, which provides guidance for local communities to meet AB 32 and EO S-3-05 targets. The Scoping Plan adopted a quantified cap on GHG emission representing 1990 emission levels, instituted a schedule to meet the emission cap, and

[10] U.S. Department of Transportation. May 2022. Corporate Average Fuel Economy Standards for Model Years 2024-2026 Passenger Cars and Light Trucks. https://www.govinfo.gov/content/pkg/FR-2022-05-02/pdf/2022-07200.pdf

[11] National Governor's Association. September 2023. Inflation Reduction Act: Infrastructure Implementation Resources. https://www.nga.org/ira-resources/#:~:text=The%20Inflation%20Reduction%20Act%20%28IRA%29%20was%20signed%20into,areas%20of%20clean%20energy%2C%20transportation%20and%20the%20environment.

[12] The White House. November 2021. Fact Sheet: The Bipartisan Infrastructure Deal Boosts Clean Energy Jobs, Strengthens Resilience, and Advances Environmental Justice. https://www.whitehouse.gov/briefing-room/statements-releases/2021/11/08/fact-sheet-the-bipartisan-infrastructure-deal-boosts-clean-energy-jobs-strengthens-resilience-and-advances-environmental-justice/

[13] State of California. June 2005. Executive Order S-3-05. https://www.library.ca.gov/wp-content/uploads/GovernmentPublications/executive-order-proclamation/5129-5130.pdf

developed tracking, reporting, and enforcement tools to assist the State in meeting the required GHG emissions reductions.

Governor's Executive Order S-1-07 (EO S-1-07; Low Carbon Fuel Standard)

Executive Order S-1-07, the Low Carbon Fuel Standard (LCFS) of 2007, requires a reduction of at least 20 percent in the carbon intensity of California's transportation fuels by 2030.[14] The LCFS requires oil refineries and distributors to ensure that the mix of fuel sold in California meets this reduction. The reduction comes from production cycle (upstream) emissions from the production and distribution of transport fuels within the state, rather than the combustion cycle (tailpipe) emissions from the use of those transport fuels.

California Senate Bill 375

SB 375 (2008) mandates each MPO in the state to adopt an RTP aimed at achieving a coordinated and balanced regional transportation system, including mass transit, highways, railroads, bicycles, and pedestrians, among other forms of transit. Each MPO is required to prepare an SCS, which sets forth forecast development patterns and describes the transportation system that achieve the regional GHG emission reduction targets set by the California Air Resources Board (CARB). CARB's 2010 targets called for the SCAG region, the MPO in which the proposed Project is located, to reduce per capita emissions by 8 percent by 2020 and 13 percent by 2035 based on a 2005 baseline. New targets were adopted in 2018, increasing SCAG's 2035 per capita emissions reduction target to 19 percent. SCAG adopted its own RTP/SCS in April 2012. The SCS lays out how the region will meet GHG targets to reduce per capita emissions 9 percent by 2020 and 16 percent by 2035 based on a 2005 baseline. In April 2016, SCAG adopted targets of 8 percent, 18 percent, and 21 percent reduction per capita GHG emissions by 2020, 2035, and 2040, respectively, based on a 2005 baseline.

Pavley Fuel Economy Standards (AB 1493)

In 2009, CARB adopted amendments to the Pavley regulations to reduce GHG emissions in new passenger vehicles from 2009 to 2016. The standards became the model for the updated federal CAFE standards.

Title 24 Building Standards & CALGreen

Title 24 is California's Building Energy Code, which is updated every three years. In 2010, Title 24 was updated to include the "California Green Building Standards Code," referred to as CALGreen. CALGreen requires that new buildings reduce water consumption, increase system efficiencies, divert construction waste from landfills, and install low pollutant-emitting finish materials. CALGreen has mandatory measures that apply to nonresidential and residential construction. The most recent 2022 CALGreen code was adopted in 2022 and became effective in January 2023. A notable change under this update is the requirement for new multi-family dwellings to provide future Electric Vehicle Supply Equipment (EVSE) Level 2 Chargers per section 4.106.4.[15] CALGreen contains voluntary Tier 1 and Tier 2 levels, which are designed to exceed energy efficiency and other standards by 15 percent or 30 percent.

AB 341

[14] University of California, Berkeley Center for Law, Energy & the Environment. N.d. California Climate Policy Fact Sheet: Low Carbon Fuel Standard. https://www.law.berkeley.edu/wp-content/uploads/2019/12/Fact-Sheet-LCFS.pdf

[15] State of California Building Standards Commission. July 2022. 2022 California Green Building Standards Code, Title 24, Part 11. https://codes.iccsafe.org/content/CAGBC2022P1

In 2011, AB 341 set the goal of 75 percent recycling, composting, or source reduction of solid waste by 2020 calling for the California Department of Resources Recycling and Recovery (CalRecycle) to take a statewide approach to decreasing California's reliance on landfills. This goal was an update to the former goal of 50 percent waste diversion set by AB 939.

Advanced Clean Cars (ACC) Program

In 2012, CARB adopted the ACC program, developed in coordination with the US EPA. The components of the ACC program are the Low-Emission Vehicle (LEV) regulations that reduce GHG emissions from light- and medium-duty vehicles, and the Zero-Emission Vehicle regulation, which requires manufacturers to produce an increasing number of battery electric and fuel cell electric vehicles, with provisions to also produce plug-in hybrid electric vehicles in the 2018 through 2025 model years.

Governor's Executive Order S-3-15 (EO S-3-15)

EO S-3-15, issued in 2015, established an interim target to reduce GHG emissions to 40 percent below 1990 levels by 2030. In 2016, the Legislature passed SB 32, which codified the 2030 GHG emissions reduction target. To reflect this target, CARB's 2017 Climate Change Scoping Plan Update recommends that local governments target six $MTCO_2e$ per capita per year in 2030 and two $MTCO_2e$ per capita per year in 2050. The CAP's GHG emission targets are based on meeting the goals set in EO S-3-15 and SB 32, following the CAP guidelines established in the 2017 Scoping Plan.

SB 32 / AB 197

On September 8, 2016, Governor Jerry Brown signed SB 32 into law. SB 32 mandates California to decrease GHG emissions by 40 percent below 1990 levels by 2030. SB 32 is a continuation of AB 32, signed into law in 2006, which set a GHG reduction target of reducing GHG emissions to 1990 levels by 2020. AB 197 is a bill that is tangentially tied to SB 32, which requires the CARB to prioritize disadvantaged communities in climate change related regulations and to prepare a scoping plan that uses the maximum technologically feasible and cost-effective GHG emissions reductions.[16]

Governor's Executive Order B-55-18 (EO B-55-18)

EO B-55-18, issued in 2018, established a statewide goal to achieve carbon neutrality as soon as possible, and no later than 2045, and to achieve and maintain net negative emissions thereafter. EO B-55-18 is established in addition to the existing statewide targets of reducing GHG emissions. To achieve this target, remaining emissions must be offset by equivalent net removals of CO_2 from the atmosphere, including through sequestration in forests, soils and other natural landscapes.

[16] University of California, Davis CLEAR Center. March 2020. How California is working to reduce greenhouse gas emissions. https://clear.ucdavis.edu/explainers/how-california-working-reduce-greenhouse-gas-emissions

100 Percent Clean Energy Act

The 100 Percent Clean Energy Act of 2018 (SB 100) sets a state policy that eligible renewable energy and zero-carbon resources supply 100 percent of all retail sales of electricity in California by 2045. SB 100 accelerates California's Renewable Portfolio Standards established under SB 350. In recognition that California retail sellers are well on their way to achieving the target in advance of the existing deadlines, SB 100 requires providers to supply 50 percent of their electricity from eligible renewable energy resources by 2026 and 60 percent by 2030.[17]

Regional

SCAG Regional Transportation Plan/Sustainable Communities Strategy (Connect SoCal)

SCAG is a Joint Powers Agency established pursuant to California Government Code Section 6502 et seq, to maintain continuing, cooperative, and comprehensive transportation planning. Through the implementation of transportation and land use strategies, Connect SoCal outlines how the region can achieve the state's GHG reduction goals and federal CAA requirements. Connect SoCal provides transportation strategies and technologies to improve the regional transportation network, prioritizes the use of streets and curb space for pedestrian access and alternative transportation modes rather than vehicles.[18] When implementing transportation projects, the plan encourages coordination with land use planning to develop housing and employment opportunities closer to each other and to public transit. The plan also includes a financial analysis considering costs for operations and maintenance (O&M) of the existing transportation system's reliability, longevity, resilience, and cost effectiveness. The most recent version of Connect SoCal was adopted on April 4, 2024.

Local

City of Los Angeles Sustainable City pLAn

The City of Los Angeles created the Sustainable City "pLAn" to build upon short-term results and long-term goals for the City's economy, environment, and equity visions. From these perspectives, the pLAn establishes a diversity of intentions, including (but not limited to): to create a framework to build policies, serve as a platform for collaboration, provide resident engagement opportunities, and identify sustainability metrics to transparently measure progress in achieving these visions. The pLAn establishes achievable visions for transforming the Los Angeles area by 2035; in the context of climate change initiatives, these visions include: increasing clean energy from solar power, increasing building energy efficiency, and strengthening Los Angeles' economy through reducing GHGs and investing in clean technology sectors.[19]

Los Angeles Unified School District Program EIR

The 2023 SPEIR includes Standard Conditions of Approval (SCs) for reducing impacts on GHG emissions in areas where future projects would be implemented under the SUP. Applicable SCs related to Project GHG emissions impacts are provided in **Table 3.3-1, *GHG Emissions Standard Conditions of Approval***.

[17] California Energy Commission. 2023. SB 100 Joint Agency Report. https://www.energy.ca.gov/sb100

[18] Southern California Association of Governments. April 2024. Connect SoCal: A Plan for Navigating to a Brighter Future. https://scag.ca.gov/sites/main/files/file-attachments/23-2987-connect-socal-2024-final-complete-040424.pdf?1714175547

[19] City of Los Angeles. December 2022. pLAN. https://plan.mayor.lacity.gov/sites/g/files/wph2176/files/2022-12/the-plan.pdf

According to the 2023 SPEIR, projects implemented under the SUP are anticipated to have less than significant and potentially significant impacts on GHG emissions within the LAUSD service area.[20]

TABLE 3.3-1
GHG EMISSIONS STANDARD CONDITIONS OF APPROVAL

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

3.3.3 Thresholds of Significance

Pursuant to Appendix G of the CEQA *Guidelines,* the Project would result in a significant impact related to greenhouse gas emissions if it would:

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

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

The proposed Project would result in significant impacts if construction or operation activities are anticipated to generate a substantial increase of GHG emissions, directly or indirectly; or if it would conflict with an applicable plan, policy, or regulation adopted to reduce GHG emissions. The estimated emissions would be compared to the goals and policies provided in the 2022 CARB Scoping Plan Update, City of Los Angeles pLAn, and SCAG's Connect SoCal. GHG impacts are exclusively cumulative impacts, which employs the "business-as-usual" projection based on current technologies and regulatory requirements. No clearly defined or quantified threshold has been formally adopted by an air district or other lead agencies in the region. The

[20] Los Angeles Unified School District. October 2023. Final Subsequent Environmental Impact Report: School Upgrade Program. https://www.lausd.org/cms/lib/CA01000043/Centricity/domain/135/ceqa/LAUSD%20SPEIR%20FINAL%20DRAFT.pdf

California Air Pollution Control Officers Association (CAPCOA) suggested an interim significance threshold of 900 $MTCO_2e$/year, which would capture 90 percent of all development projects.

The South Coast Air Quality Management District (SCAQMD) implemented CAPCOA's policy objective of capturing 90 percent of all GHG emissions for this region and established a screening level of 3,000 $MTCO_2e$/year to identify whether projects would require further analysis for mitigation measures, if GHG emissions are exceeded. SCAQMD released its most current version of draft GHG emissions thresholds in 2010, recommending a tiered approach providing a quantitative annual threshold of 3,500 $MTCO_2e$ for residential uses, 1,400 $MTCO_2e$ for commercial uses, and 3,000 $MTCO_2e$ for mixed uses. SCAQMD also proposed an alternative annual threshold of 3,000 $MTCO_2e$ for all land use types, which is the significance threshold applied of this impact analysis. Based on recommended SCAQMD guidance, estimated annual emissions calculated for the proposed Project will be amortized over an assumed 30-year Project lifetime so that GHG reduction measures will address construction GHG emissions as part of the operational GHG reduction strategies, and will be compared to SCAQMD thresholds to determine whether the proposed Project would result in potential impacts.

3.3.4 Methodology

Significance thresholds were applied based on federal energy policies, state building codes, and local energy efficiency policies. Implementation of the proposed Project was evaluated with regard to the proposed Project's Initial Study, the City of Los Angeles Sustainable City pLAn,[21] the 2022 CARB Scoping Plan Update,[22] the National Ambient Air Quality Standards (NAAQS), the California Ambient Air Quality Standards (CAAQS), the Clean Air Act (CAA), and SCAG's 2024–2050 RTP/SCS – Connect SoCal.[23]

Construction Emissions

Construction of the proposed Project has the potential to generate temporary GHG emissions through the use of heavy-duty construction equipment, such as excavators and forklifts, and through vehicle trips generated from worker trips and haul trucks traveling to, and from, the Project site. Mobile source GHG emissions, primarily CO_2, CH_4, and N_2O, would result from the use of construction equipment such as dozers and loaders. Construction emissions can vary substantially from day to day, depending on the level of activity, the specific type of construction activity, and prevailing weather conditions. The assessment of construction GHG emissions impacts considers each of these potential sources.

Annual emissions during construction are forecasted by using seasonal weighting factors and are based on the product of the daily construction emissions (in pounds per day) and working days per year by phase. These emissions are estimated using the CalEEMod (Version 2022.1.1.25) software, an emissions inventory software program recommended by the SCAQMD, and are based on assumptions of a worst-case scenario. CalEEMod is based on outputs from OFFROAD and EMFAC, which are emissions estimation models developed by CARB and used to calculate emissions from construction activities, including on-and off-road vehicles. Default CalEEMod inputs were used for the modeling unless Project-specific details were available to adjust the Project input values based on

[21] City of Los Angeles. December 2022. pLAn. https://plan.mayor.lacity.gov/sites/g/files/wph2176/files/2022-12/the-plan.pdf

[22] California Air Resources Board. November 2022. 2022 Scoping Plan for Achieving Carbon Neutrality. https://ww2.arb.ca.gov/sites/default/files/2022-12/2022-sp_1.pdf

[23] Southern California Association of Governments. April 2024. Connect SoCal: A Plan for Navigating to a Brighter Future. https://scag.ca.gov/sites/main/files/file-attachments/23-2987-connect-socal-2024-final-complete-040424.pdf?1714175547

construction equipment and schedule information from similar land use development projects in the LAUSD. These values were then applied to the construction phasing assumptions used in the GHG emissions analysis to generate emissions values for each construction activity. This analysis uses $MTCO_2e$ to represent the cumulative sum of all measurable GHG emissions generated annually during construction, including CH_4, CO_2, and N_2O. Detailed construction equipment lists, construction scheduling, and emissions calculations are provided in Appendix 6 of this Draft EIR.

As described in Chapter 2, *Project Description*, construction of the proposed Project was assumed to begin in the first quarter of 2026 and complete in the third quarter of 2029. Construction may commence at a later date than that analyzed in this GHG impact analysis. If this occurs, construction impacts should be less than those analyzed herein, because a more energy-efficient and cleaner burning construction equipment fleet mix are expected in the future, pursuant to State regulations that require construction equipment fleet operators to phase-in less polluting heavy-duty equipment. As a result, should the proposed Project commence construction at a later date, GHG impacts are anticipated to be less than the impacts disclosed herein. Sub-phases of construction would include demolition, site preparation, grading, building construction, paving, and architectural coating. Emissions from these activities are estimated for the duration of construction for the proposed Project. As discussed above, estimated annual GHG emissions calculated for the proposed Project would be compared to SCAQMD thresholds to determine whether the proposed Project would result in potential impacts.

Operational Emissions

With respect to SUP modernization projects, the 2023 SPEIR states that operational activities would be less than significant, as these projects would not increase capacity to existing schools, and net Project emissions would be minimal. Additionally, overall District enrollment is forecast to decrease over the next 10 years, and operational emissions are not expected to increase in the long-term.[24]

The proposed Project would replace and upgrade facilities on the Irving MS Campus, but it would not increase the number of students, or faculty, at the school and would not introduce major new emission sources. No new vehicle trips would be generated, and there would be no increase in mobile source emissions. Furthermore, the proposed Project would be required to abide by CalGreen mandatory guidelines. The proposed Project's modernization initiative would facilitate building upgrades and the replacement of old, energy-inefficient structures with those that use less energy and reduce emissions from space heating and other onsite sources to meet the most current Title 24 building energy standards. Therefore, there would be no net increase in regional operational GHG emissions, and the impact would be less than significant. Additionally, the District is required to comply with all applicable SCs and would implement SC-GHG-1 through SC-GHG-5, requiring the installation of water and energy efficient features, to further reduce Project-related operational impacts. Therefore, operational GHG emissions on a regional scale are not discussed further in this document.

[24] Los Angeles Unified School District. October 2023. Final Subsequent Environmental Impact Report: School Upgrade Program. https://www.lausd.org/cms/lib/CA01000043/Centricity/domain/135/ceqa/LAUSD%20SPEIR%20FINAL%20DRAFT.pdf

3.3.5 Impact Analysis

Impact 3.3-1: The Project would not generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment.

As discussed in Section 3.1, *Air Quality*, short-term pollutants would be generated by construction of the proposed Project. The proposed Project site currently operates as a middle school and would continue to remain so after construction. The proposed Project would not introduce any new net regional GHG emissions when operational (see Section 3.3-4). Therefore, only short-term construction emissions were evaluated for the generation of GHG emissions, either directly or indirectly.

Construction

Construction of the proposed Project would generate two types of short-term emissions: mobile-source emissions from the transport of workers, material deliveries, and debris/soil hauling; and on-site emissions from operating construction equipment. The construction equipment associated with the proposed Project activities is provided in Table 2-4 (see Section 2.6.8, *Construction Schedule*). Estimated annual construction-generated emissions, provided in **Table 3.3-2, *Construction GHG Emissions Summary and Significance Evaluation***, are compared to the SCAQMD significance threshold of 3,000 $MTCO_2e$ per year.

TABLE 3.3-2
CONSTRUCTION GHG EMISSIONS SUMMARY AND SIGNIFICANCE EVALUATION

	Construction Year (MTCO2e/year)			
	2026	**2027**	**2028**	**2029**
Construction Annual Emissions	179	157	166	98.5
Amortized Annual Emissions (over 30 years)	20.0	—	—	—
SCAQMD Threshold ($MTCO_2e$/year)	3,000			
Exceeds Threshold?	**No**			

Note: SCAQMD methodology recommends amortization of total construction emissions over 30 years.
Source: CalEEMod, version 2022.1.1.25; Appendix 6, *Emissions Calculations*.

Amortized GHG emissions from construction activities would result in 20.0 annual $MTCO_2e$. Construction emissions are based on the type, amount, and duration of off-road construction equipment, as well as the size of the Project. Annual construction emissions, in addition to operation emissions, would not exceed the regulatory threshold. Implementation of measure SC-AQ-2 would lower construction equipment emissions by reducing excessive emissions and maintaining use of equipment in compliance with regulatory standards. The proposed Project would also comply with CARB's In-Use Off-Road Diesel-Fueled Fleets Regulation (Off-Road Regulation) by implementing strategies to control off-road equipment idling, control fugitive dust impacts, and utilize new engine off-road equipment during construction activities to reduce cumulative statewide GHG emissions. Construction impacts would be less than significant. No further analysis is warranted.

Significance Determination

Less than Significant.

Mitigation Measures

No mitigation measures are required.

Impact 3.3-2: The Project would not conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

The proposed Project would result in no impacts in relation to conflicting with an applicable plan, policy or regulation adopted for the purpose of reducing GHG emissions. The primary plans and policies applicable to the proposed Project include the CARB Scoping Plan,[25] SCAG's Connect SoCal,[26] and the City of Los Angeles Sustainable City pLAn.[27]

CARB Scoping Plan

The CARB has set GHG reduction targets for the SCAG region of reducing per capita GHG emissions 8 percent below 2005 levels by 2020 and 19 percent by 2035.[28] The CARB Scoping Plan is applicable to state agencies and is not directly applicable to individual projects but has been the primary tool used to develop performance-based and efficiency-based GHG reduction targets for climate planning efforts. Statewide strategies to reduce GHG emissions include the Low Carbon Fuel Standard, California Appliance Energy Efficiency regulations, changes to the California Renewable Energy Portfolio standard, changes in the Corporate Average Fuel Economy standards, and other early action measures to ensure attainment of emission reduction goals provided by AB 32 and SB 32.

The proposed Project would employ strategies provided in the Scoping Plan by contributing to the transition of energy production and transmission infrastructure to produce zero-carbon electricity and hydrogen. By removing existing buildings and constructing a two-story building with classrooms, the proposed Project would comply with the latest applicable Building Energy Efficiency Standards and CALGreen. Through measures provided by the Scoping Plan, the proposed Project would reduce emissions compared to existing settings and would adhere to the CARB Scoping Plan. Since the proposed Project would comply with GHG emission reduction measures, as provided in the 2023 SPEIR, the proposed Project would result in no impacts.

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[25] California Air Resources Board. December 2022. Final 2022 Scoping Plan. https://ww2.arb.ca.gov/our-work/programs/ab-32-climate-change-scoping-plan/2022-scoping-plan-documents

[26] Southern California Association of Governments. April 2024. Connect SoCal: A Plan for Navigating to a Brighter Future. https://scag.ca.gov/sites/main/files/file-attachments/23-2987-connect-socal-2024-final-complete-040424.pdf?1714175547

[27] City of Los Angeles. December 2022. pLAN. https://plan.mayor.lacity.gov/sites/g/files/wph2176/files/2022-12/the-plan.pdf

[28] Southern California Association of Governments. April 2024. Connect SoCal: A Plan for Navigating to a Brighter Future. https://scag.ca.gov/sites/main/files/file-attachments/23-2987-connect-socal-2024-final-complete-040424.pdf?1714175547

Connect SoCal 2024

SCAG's most recent RTP/SCS, Connect SoCal 2024, focuses on four categories that influence the regional challenges addressed in the plan: economy, mobility, environment, and healthy/complete communities.[29] The proposed Project contributes to these categories by improving the existing school campus through the replacement of classrooms to better support the community and addressing infrastructure vulnerabilities. SCAG's green region policy focuses on the balance of land use patterns between the built and natural environments by deemphasizing growth in rich natural environments and supporting local policies to reduce carbon emissions. LAUSD is committed towards a 100 percent renewable energy production commitment by 2040 in accordance with the Clean Energy Resolution, signed on December 3, 2019.[30] This resolution will gradually reduce GHG emissions from nonrenewable energy expenditures throughout the school district, including at the proposed Project site during operations. Additionally, this commitment aligns with Connect SoCal's environmental policy to promote sustainable development, in relation to the responsible management of energy resources and corresponding reduction of GHG emissions.

The proposed Project would provide new facilities for existing and future students and would serve the local population in the nearby communities. The proposed Project site is located within 0.3-mile of a SCAG-designated High-Quality Transit Corridor (HQTC) due southwest, which signifies the availability of fixed-route bus service with service intervals of no longer than 15 minutes during peak commute hours.[31,32] HQTCs help reduce GHG emissions impacts by providing alternate public transportation opportunities to an area and thereby reduce the number of vehicles traveling to and from the proposed Project site. The proposed modernization and retrofitting activities would not result in any changes to existing land uses or the existing roadway network; no conflicts with Connect SoCal are expected and the proposed Project would result in reduced GHG emissions during operation.

With implementation of SC-USS-1, construction contractors shall reuse, recycle, and salvage non-hazardous materials generated during demolition and/or new construction. Material recovery during construction activities would minimize the need to produce and transport new materials and reduce emissions from mobile sources and energy use. The proposed Project would also maintain water and energy efficiency practices, pursuant to SC-GHG-1 through SC-GHG-5; and the implementation of SCS-USS-1 measures would ensure compliance with applicable plans, policies, or regulations adopted for the purpose of reducing GHG emissions.

Los Angeles Sustainable City pLAn

The City of Los Angeles established sustainability strategies and priority initiatives set forth in the "pLAn," including the decarbonization of Los Angeles' electrical grid, reduction of citywide energy consumption through

[29] Southern California Association of Governments. April 2024. Connect SoCal: A Plan for Navigating to a Brighter Future. https://scag.ca.gov/sites/main/files/file-attachments/23-2987-connect-socal-2024-final-complete-040424.pdf?1714175547

[30] The Climate Reality Project. December 2019. Los Angeles Unified School District Commits to 100 Percent Clean, Renewable Energy. https://www.climaterealityproject.org/press/los-angeles-unified-school-district-commits-100-percent-clean-renewable-energy

[31] Southern California Association of Governments. N.d. High Quality Transit Corridors Interactive. https://maps.scag.ca.gov/portal/apps/experiencebuilder/experience/?id=97f9699f14654b3b8895c74846541f75&page=home

[32] Southern California Association of Governments. April 2024. Connect SoCal: A Plan for Navigating to a Brighter Future. https://scag.ca.gov/sites/main/files/file-attachments/23-2987-connect-socal-2024-final-complete-040424.pdf?1714175547

education and retrofitting, and integration of sustainable practices into all City departments and operations.[33] As the proposed Project is classified as a modernization effort per Section 5.8.3.1.2 of the 2023 SPEIR, it would meet these goals as established by the City to reduce GHG emissions. As discussed, LAUSD is committed towards a 100 percent renewable energy production commitment by 2040, which would exceed long-term GHG emissions and efficiency targets specified in the pLAn.

Therefore, the proposed Project would not conflict with a plan, policy, or regulation to reduce GHG emissions. No further analysis is warranted.

Significance Determination

Less than Significant.

Mitigation Measures

No mitigation measures are required.

3.3.6 Cumulative Impact Analysis

As discussed in Section 3.3.3, *Thresholds of Significance,* the assessment of GHG emissions is an inherently cumulative impacts analysis as these emissions contribute to global climate change and emissions from one project alone would be considered negligible compared to worldwide GHG emissions. The assessment of significance for cumulative impacts under CEQA is based on incremental impacts assuming implementation of the proposed project as identified in section 15064h(3) of the CEQA Guidelines,[34] which states:

> *"A lead agency may determine that a project's incremental contribution to a cumulative effect is not cumulatively considerable if the project will comply with the requirements in a previously approved plan or mitigation program.."*

The lead agency, the District, has determined that the proposed project would meet this criterion based on the conclusion that the proposed Project would not conflict with the applicable regulatory plans and policies to reduce emissions as discussed under Impact 3.3-2, including CARB's 2022 Scoping Plan Update, SCAG's Connect SoCal, and the City's Sustainable City pLAn. The proposed Project would also not conflict with CalGreen's mandatory guidelines and Title 24 building energy standards. Moreover, the proposed project would result in a less than significant impact related to GHG emissions during construction, as evidenced in Impact 3.3-1. Therefore, the proposed project's incremental impacts regarding GHG emissions would not be cumulatively considerable.

Significance Determination

Less than Significant.

Mitigation Measures

No mitigation measures are required.

[33] City of Los Angeles. December 2022. pLAn. https://plan.mayor.lacity.gov/sites/g/files/wph2176/files/2022-12/the-plan.pdf

[34] 14 California Code of Regulations Section 15064.

3.3.7 References

14 California Code of Regulations Section 15064.

California Air Resources Board. November 2022. 2022 Scoping Plan for Achieving Carbon Neutrality. https://ww2.arb.ca.gov/sites/default/files/2022-12/2022-sp_1.pdf

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3.4 Hazards and Hazardous Materials

This section evaluates the potential for the proposed Project to result in adverse impacts related to hazards and hazardous materials. The information presented below is based in part on the research conducted for the Phase I Environmental Site Assessment (ESA) (see Appendix 1-A, *Phase I ESA*, in the Initial Study), prepared by Eco & Associates, Inc., and the Preliminary Environmental Assessment Equivalent (PEA-E) Report (see Appendix 1-F, *PEA-E Report*, in the Initial Study) prepared by Civil-Environmental-Survey Group (CES) and approved by the LAUSD OEHS, and finally by the Soil Removal Plan (SRP) (see Appendix 4, *Irving MS Soil Removal Plan*), prepared by CES for the proposed Project. The information presented below is also based on maps of the Project area, including reports and information posted on State Water Resources Control Board (SWRCB) Geotracker database and the Department of Toxic Substances Control (DTSC) EnviroStor database. This section includes relevant regulations, and a discussion of the methodology and thresholds used to determine whether the proposed Project would result in significant impacts. An evaluation of the proposed Project's contribution to potential cumulative impacts is also provided.

3.4.1 Environmental Setting

The approximately 11.2-acre Project site, which is currently developed with the existing Irving MS Campus, is located southwest of the intersection of Estara Avenue and Fletcher Drive in the City of Los Angeles, California. The site is an operating middle school consisting of 11 permanent buildings and six portable buildings with a total of 65 classrooms. Based on visual observations for the Phase I ESA (Appendix 1-A), current activities at the adjacent properties do not appear to be of environmental concern to the Project site. The adjoining properties and land uses include Fletcher Drive northwest of the Project site, followed by commercial and retail properties; the northern boundary is abutted by commercial and residential properties. The southern boundary is abutted by W. Avenue 32, followed by residential properties. The west end is abutted by the State Route 2 freeway, and the east end is abutted by residential properties, Estara Avenue, followed by Fletcher Elementary School.

The buildings onsite include a Cafeteria, Auditorium, Gymnasium, Administration Building, three shop buildings, and various permanent and portable classroom buildings. Lead-based paints and asbestos-containing materials (ACM) may occur in pre-1970s buildings. Six of the buildings were constructed between 1936 and 1939:[1]

- Administration Building (1937)
- Auditorium (1939)
- Physical Education Building (1937)
- Cafeteria (1938)

[1] Los Angeles Unified School District. August 2022. Historic Resource Evaluation Report.

- Shop No. 1 (1936-1939)
- Shop No. 2 (1936-1939)

In the 1940s and again in the 1980s, the school expanded by taking over adjacent residential properties, and the remaining five permanent buildings and six portable buildings were added to the campus between 1955 and 2004:[2]

- A third Shop Building (1955)
- One-story Classroom (1956)
- Homemaking Building (1956)
- Six bungalow classrooms (1947–1970)
- Two-story Classroom Building (1990)
- Sanitary Building (2004)

The Administration Building, permanent buildings, and the basement, which includes the paint storage room and former boiler room, were observed during the site visit conducted in preparation of the Phase I ESA. The Administration Building, permanent classroom buildings, and Physical Education Building are two-story structures, and the remaining buildings are single-story; however, some of the single-story buildings contain lofts. Some buildings, including the Administration Building and Auditorium, contain basements and air-handler crawl spaces.

In the Administration Building and Auditorium, interior building materials were observed to be aged, but the building was in good physical condition. Interior building materials include vinyl and ceramic flooring, plaster walls, suspended ceiling tiles, and glue-on ceiling tiles. The former boiler rooms in the Auditorium and Administration Building consisted of damaged plaster. The existing permanent buildings are constructed of steel truss and reinforced concrete and finished with plaster.

It was formerly common practice for LAUSD to apply an arsenic based herbicide to the soil immediately prior to paving with asphalt and apply termiticides around wooden structures at school sites as a means of pest control. There is potential that elevated arsenic concentrations (greater than background levels) and organochlorine pesticides (OCP) concentrations are present in the soils immediately underlying the paved portions of the site.

A paint storage room is located at basement level at the northwest end of the Administration Building. Approximately 25 five-gallon poly containers and 14 one-gallon steel containers of paint are stored in the room and are stacked on the concrete floor or stored on wood shelving. A minor amount of spillage was observed on the concrete floor. A former boiler room is located at basement level at the north corner of the

[2] NAC Architecture. February 3, 2023. Irving Steam Magnet Middle School Site Analysis and Development Report. Prepared for Los Angeles Unified School District.

Administration Building. Next to the former boiler room are additional storage rooms. Some of the rooms were inaccessible due to locked doors.

With the exception of newer portable buildings on the Project site, it is likely that the paint on the buildings contains, or formerly contained, elevated lead concentrations. Due to slow deterioration with time, paint typically flakes off and accumulates in the adjoining soils. This can result in elevated lead concentrations in the soil. However, the onsite buildings are mostly adjoined by pavement. As such, the potential that the soils underlying this pavement have been impacted with lead is considered relatively low. Heavily damaged and peeling paint was observed on the ceiling of the boiler room in the Administration Building.

Hazardous Materials Database Listings

According to the Phase I ESA and attached Environmental Data Resources, Inc. (EDR) database report, the Project site is listed in the Federal Insecticide, Fungicide, and Rodenticide Act/Toxic Substance Control Act Tracking system (FTTS), California Environmental Reporting System (CERS), Hazardous Waste Tracking System (HWTS), Resource Conservation and Recovery Act Large Quantity Generators (RCRA-LQG), US Environmental Protection Agency Facility Registry System (FRS), and Enforcement and Compliance History Online (ECHO) databases (Appendix 1-A). The EDR database search report also noted several off-site properties of potential concern based on the Project site's location within an older, densely developed urban environment (**Table 3.4-1, *Off-Site Properties of Potential Concern***). Numerous other facilities were listed in the surrounding area based on location of the Project site within an older, densely developed urban environment. Based on their listing for regulatory tracking purposes only, case closed status, hydraulic location with respect to groundwater flow direction, and/or distance from the Project site, the remaining offsite properties are not expected to present any concern of environmental impairment or a vapor encroachment condition to the Project site.

TABLE 3.4-1
OFF-SITE PROPERTIES OF POTENTIAL CONCERN

Property Name	Address and Distance from Project Site	Property Description
San Fernando Valley, Area 1, North Hollywood Wellfield Area	Located approximately 0.25-mile south and southwest from the Project site	This area is listed in several databases, including the EnviroStor and NPL databases. The San Fernando Valley Area 1 site is a 20-square-mile area of contaminated groundwater located primarily in North Hollywood and Burbank, California. Numerous responsible parties (PRPs) have been identified as possible contributors to groundwater contamination in the region with volatile organic compounds (VOCs), including trichloroethylene (TCE) and perchloroethylene (PCE) being the primary constituents of concern (COCs). Construction of the groundwater cleanup remedy began in 1989 and operation is ongoing. As of 2008, the system had extracted and treated about 8 billion gallons of VOC-contaminated groundwater. The latest contaminant plume maps, dated November 24, 2020, indicate that the impacted groundwater plume is approximately 0.25 mile south and southwest from the Project site. As groundwater is actively being pumped and treated, the plume is not expected to migrate. Based on the information reviewed, this area is not expected to represent an environmental concern to the site.[3]
Stikich Color Lab, Inc.	3225 N. Fletcher Drive, located adjacent and southwest of the Project site	This facility is listed in databases including CA-SLIC. The facility is listed in the CA-SLIC database for a release to the soil and groundwater. The material released is not listed. Based on records reviewed from the Regional Water Quality Control Board (RWQCB), the case was originally closed in 1997; however, a second case closure was granted in 2014. Based on the closed-case status for this facility, this facility is not expected to represent an environmental concern to the site.
Fletcher Drive Elementary School	3350 Fletcher Drive, located adjacent and northeast of the Project site	This facility is listed in databases including EnviroStor, CA UST, FINDS, and HAZNET. The facility was listed in the CA UST database for maintaining a UST; however, a UST has not been identified onsite. The facility is also listed in the EnviroStor database for a proposed expansion. No environmental concerns were found by the DTSC. Based on the information reviewed, this facility is not expected to represent an environmental concern to the Site.

Numerous other facilities are listed in the surrounding area based on the Project site's location within an older, densely developed urban environment; however, based on their listing for regulatory tracking purposes only, case closed status, location with respect to groundwater flow direction, and/or distance from the Project site, these offsite properties are not expected to represent a concern of environmental impairment or a vapor encroachment condition to the Project site. Two additional properties are listed in EDR's Orphan Summary section; however, based on their listing in regulatory tracking databases, status, and/or incomplete address information, they do not appear to represent an environmental concern to the Project site.

[3] U.S. Environmental Protection Agency. N.d. San Fernando Valley (Area 1) North Hollywood, CA. Reports and Documents. Sahttps://cumulis.epa.gov/supercpad/SiteProfiles/index.cfm?fuseaction=second.scs&id=0902251&doc=Y&colid=37375&region=09&type=SC

Soil Conditions

The general geology summary provided in the Phase I ESA specifies that the sediments beneath the Site have been identified as part of the Quaternary Series of the Quaternary System of the Cenozoic Era (see Appendix 1-A). According to the United States Department of Agriculture Soil Conservation Service, the site is underlain by the Urban Land soil component, which is land that has been disturbed to the extent that native soil characteristics are no longer able to be defined.

Hydrocarbon-impacted soil has been identified to be present north of the Administration Building. The impacted soil results from a former underground storage tank (UST) used for storing heating oil. CES completed soil investigation activities and a subsequent PEA-E report in May and June 2023. A subsequent SRP was prepared by CES in December 2023 to address the potential health risks to construction workers, onsite students, and staff, and surrounding residents through the implementation of soil management processes intended to close potential exposure routes to potentially impacted soils.

Arsenic-impacted soil was identified in shallow soil at five locations within the site, near the Administration Building, Homemaking Building, and portable buildings north of Shop 2, during preparation of the PEA-E. Asbestos-impacted soil was also identified in shallow soil at two locations within the Project site, near the portable buildings north of Shop 2. Additional chemicals of concern were identified at the Project site and include lead, cadmium, nickel, mercury, polyaromatic hydrocarbons (PAHs), polychlorinated biphenyl (PCBs). These chemicals of concern were reported below their respective screening level or the 95% Upper Confidence Limit (95% UCL).

Groundwater Conditions

The aquifers in the San Fernando Valley Groundwater Basin are generally unconfined with some confinement within the Saugus Formation in the western part of the basin. Groundwater flows toward the middle of the basin, then south beneath the Los Angeles River Narrows into the Central Subbasin of the Coastal Plain of Los Angeles Basin.[4] Based on topography, groundwater is anticipated to flow to the south/southwest.

Flood Zones

According to the EDR database report presented in the Phase I ESA (Appendix 1-A) and Federal Emergency Management Agency (FEMA) data, the Site is not located in a flood hazard area per FEMA Flood Plain Panel 06037C1626F.

Earthquake Faults/Liquefaction

According to the interactive California Department of Conservation Fault Activity Map of California, the Project site lies on or very near the Raymond Fault.[5] According to the Los Angeles County, California

[4] California Department of Water Resources. February 27, 2004. South Coast Hydrologic Region, San Fernando Valley Groundwater Basin. California's Groundwater Bulletin 118. https://water.ca.gov/-/media/DWR-Website/Web-Pages/Programs/Groundwater-Management/Bulletin-118/Files/2003-Basin-Descriptions/4_012_SanFernandoValley.pdf

[5] California Department of Conservation. N.d. Fault Activity Map of California. https://maps.conservation.ca.gov/cgs/fam/ (accessed February 13, 2024).

Liquefaction Zones website, the Project site is not located within a liquefaction zone. A liquefaction zone is depicted approximately 0.25 mile south-southwest from the site.[6]

Radon and Methane

According to the Phase I ESA (Appendix 1-A), reviewed by the LAUSD OEHS, the site is located within a "high radon zone," identified as having a high potential for radon gas levels to be above 4 picoCuries per liter (pCi/L) of air. The U.S. Environmental Protection Agency's (EPA) action level for radon gas is 4 pCi/L of air. Therefore, during construction and/or renovation of onsite buildings, "all relevant and appropriate measures" must be incorporated in design and construction to prevent radon gas infiltration (see Appendix 1-A for a copy of LAUSD's Irving Steam Middle School – Radon Determination memorandum).

Although the 2022 Phase I ESA states the Project site is located in a "high radon zone," Sapphos Environmental, Inc. reviewed the California Department of Conservation Map of Indoor Radon Potential, which listed the Project site as being in a moderate zone for Indoor radon potential.[7] The LAUSD Office of Environmental Health and Safety does not require radon testing or mitigation for school sites in moderate radon zones.[8]

According to the City of Los Angeles, Bureau of Engineering, Department of Public Works' Methane and Methane Buffer Zones map,[9] the site is not located in a methane or methane buffer zone.

3.4.2 Regulatory Setting

Hazardous materials and wastes can pose a significant actual or potential hazard to human health and the environment when improperly treated, stored, transported, disposed of, or otherwise managed. Many federal, state, and local programs that regulate the use, storage, and transportation of hazardous materials and hazardous waste are in place to prevent these unwanted consequences. National, state, regional and local laws, regulations, plans, and guidelines are summarized below.

This section provides a general discussion of the most important plans and policies that apply to LAUSD School Upgrade Program (SUP)-related projects. The following regulatory framework discussion does not include all plans and policies that relate to hazards and hazardous materials in the District. Site-specific projects have not been identified, and there may be local jurisdictional plans and policies that are applicable depending on the project site. Specific requirements of these laws, regulations, plans, and guidelines might not be up to

[6] Los Angeles County Liquefaction Zones. June 21, 2019. https://koordinates.com/layer/95936-los-angeles-county-liquefaction-zones/Ac (accessed February 13, 2024).

[7] California Department of Conservation. 2016. Indoor Radon Potential. https://maps.conservation.ca.gov/cgs/radon/ (accessed February 24, 2024).

[8] Los Angeles Unified School District. June 12, 2017. Reference Guide. Procedures for Environmental Review of Proposed Projects. https://www.lausd.org/cms/lib/CA01000043/Centricity/Domain/135/Ref_Guide_5314.2_Procedures_for_Envir_Rev_of_Proposed_Projects_w_Att.pdf

[9] Christopher A. Joseph and Associates. March 31, 2004. Figure IV.F-2 LADBS Methane and Methane Buffer Zone Map. https://planning.lacity.gov/eir/WetherlyProject/DEIR/Graphics/Figure%20IV.F-2_LADBS%20Methane%20and%20Methane%20Buffer%20Zone.pdf

date when a proposed site-specific school project undergoes review. These regulatory programs are designed to reduce the danger that hazardous substances may pose to people and businesses under normal daily circumstances and as a result of emergencies and disasters. Although some of these may not be directly applicable to the SUP or site-specific projects implemented under the SUP, they are included to assist in identifying impacts and significance thresholds. Applicable LAUSD Standards are also listed below.

Federal

U.S. Code, Title 42, Sections 6901 et seq.

The Resource Conservation and Recovery Act of 1976 (RCRA) is the principal federal law that regulates the generation, management, and transportation of waste. Hazardous waste management includes the treatment, storage, or disposal of hazardous waste. Treatment is any process that changes the physical, chemical, or biological character of the waste to reduce its potential as an environmental threat. Treatment can include neutralizing the waste; recovering energy or material resources from the waste; rendering the waste less hazardous; or making the waste safer to transport, dispose of, or store.

RCRA assigns the EPA the authority to control hazardous waste from "cradle to grave," that is, from generation to transportation, treatment, storage, and disposal. It also sets up a framework for the management of nonhazardous solid waste and certain hazardous wastes that are exempted from regulation, such as household hazardous wastes. The 1984 Hazardous and Solid Waste Amendments to RCRA enabled the EPA to address environmental problems that could result from underground tanks storing petroleum and other hazardous substances. These amendments also enacted restrictions on the land disposal of hazardous wastes, requiring them to be pretreated to render them less hazardous, or barring their disposal completely.

U.S. Code, Title 42, Sections 9601 et seq.

The federal Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA) was enacted to protect the water, air, and land resources from the risks created by past chemical disposal practices such as abandoned and historical hazardous wastes sites. Through the Act, the EPA was given power to seek out the parties responsible for any release and assure their cooperation in the cleanup. This federal law created a tax on the chemical and petroleum industries that went to a trust fund for cleaning up abandoned or uncontrolled hazardous waste sites and therefore created a "Superfund" source for these efforts; the program and its associated sites are commonly known as "Superfund sites." CERCLA also enabled the revision of the National Contingency Plan, which provided the guidelines and procedures needed to respond to releases and threatened releases of hazardous substances, pollutants, or contaminants. The National Contingency Plan established the National Priority List of sites, known as Superfund sites. CERCLA was amended by the Superfund Amendments and Reauthorization Act (SARA) of 1986 to continue cleanup activities around the country.

U.S. Code, Title 42, Sections 11001 et seq.

The Emergency Planning and Community Right-to-Know Act of 1986 (EPCRA), commonly known as Title III of SARA, was enacted by Congress as the national legislation on community safety. This law was designated to help local communities protect public health, safety, and the environment from chemical hazards. The

primary purpose of EPCRA is to inform communities and citizens of chemical hazards in their areas by requiring businesses to report the locations and quantities of chemicals stored onsite to state and local agencies. These reports help communities prepare to respond to chemical spills and similar emergencies. Section 313.1 of EPCRA requires manufacturers to report releases to the environment (air, soil, and water) of more than 600 designated toxic chemicals; report offsite transfers of waste for treatment or disposal at separate facilities; implement pollution prevention measures and activities; and participate in chemical recycling. These annual reports are submitted to the EPA and state agencies. The EPA maintains and publishes a database that contains information on toxic chemical releases and other waste management activities by certain industry groups and federal facilities. This online, publicly available, national digital database is called the Toxics Release Inventory (TRI) and was expanded by the Pollution Prevention Act of 1990.

To implement EPCRA, Congress required each state to appoint a State Emergency Response Commission (SERC) to coordinate planning and implementation activities associated with hazardous materials. The SERCs were required to divide their states into emergency planning districts and to name a local emergency planning committee (LEPC) for each district. The federal EPCRA program is implemented and administered in California by the California Emergency Management Agency (CalEMA), a SERC, six LEPCs, and 83 certified unified program agencies (CUPAs). CalEMA and the Governor's Office of Emergency Services (OES) coordinate and provide staff support to the SERC and LEPCs. Broad representation by firefighters, health officials, government and media representatives, community groups, industrial facilities, and emergency managers ensures that all necessary elements of the planning process are represented.

U.S. Code, Title 15, Sections 2601 et seq.

The Toxic Substances Control Act of 1976 was enacted by Congress to give the EPA the ability to track the 75,000 industrial chemicals currently produced or imported into the United States. The EPA repeatedly screens these chemicals and can require reporting or testing of any that may pose an environmental or human health hazard. It can ban the manufacture and import of chemicals that pose an unreasonable risk. Also, the EPA has mechanisms in place to track the thousands of new chemicals that industry develops each year with either unknown or dangerous characteristics. It then can control these chemicals as necessary to protect human health and the environment. The Act supplements other federal statutes, including the Clean Air Act and the TRI under EPCRA.

State

Senate Bill 14

The California Hazardous Waste Source Reduction and Management Review Act of 1989, also known as Senate Bill (SB) 14, required large-quantity generators—those that annually produce more than 13.2 tons of hazardous waste or 26.4 pounds of extremely hazardous waste—to periodically conduct a source evaluation of their facilities and develop plans to reduce their volume of hazardous waste through measures such as changes in raw materials production methods, product reformulations, and employee training. The primary objective of the legislation was to reduce the quantity of hazardous waste generated in California and, thereby, promote public health and improve environmental quality. Generators that exceed the waste volume thresholds are required to file waste minimization reports with DTSC every four years.

California Code of Regulations, Title 5, Division 1, Chapter 13, Subchapter 1, Article 2, Section 14010

The California Code of Regulations (CCR), Section 14010 (Title 5) has several standards that are considered in the selection of new school sites. CCR Title 5 requirements that relate to the identification and mitigation of potential health risks and safety hazards are summarized below:

Section 14010(c). The property line of the site, even if it is part of a joint use agreement, shall be at least the following distance from the edge of respective power line easements:

- 100 feet for 50–133 kV (kilovolt) line.
- 150 feet for 220–230 kV line.
- 350 feet for 500–550 kV line.

Section 14010(d). If the proposed site is within 1,500 feet of a railroad track easement, a safety study shall be done by a competent professional to assess potential rail safety hazards and identify possible and reasonable mitigation measures.

Sections 14010(e) and (l). The site shall not be located adjacent to a road or freeway that any site-related traffic study has determined will pose a safety problem. The site shall not be on major arterial streets with a heavy traffic pattern unless mitigation of traffic hazards and a plan for the safe arrival and departure of students has been prepared in accordance with Caltrans's "School Area Pedestrian Safety Manual."

Section 14010(f). Pursuant to Education Code Sections 17212 and 17212.5, the site shall not contain an active earthquake fault or fault trace.

Section 14010(g). Pursuant to Education Code Sections 17212 and 17212.5, the site is not within an area of flood or dam flood inundation unless the cost of mitigating the flood or inundation impact is reasonable.

Section 14010(h). The site shall not be located near an aboveground water or fuel storage tank or within 1,500 feet of 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.

Section 14010(i). The site is not subject to moderate to high soil liquefaction or landslides.

Section 14010(m). Existing or proposed zoning of the surrounding properties shall be compatible with schools in that it would not pose a potential health or safety risk to students or staff in accordance with Education Code Section 17213.

Section 14010(t). If the proposed site is on or within 2,000 feet of a significant disposal of hazardous waste, the school district shall contact the DTSC for a determination of whether the property should be considered a Hazardous Waste Property or Border Zone Property.

California Education Code

The California Education Code sets several legal requirements for the evaluation of hazards and hazardous materials designed to ensure that school sites and school facilities are safe for students, staff, and visitors. The California Department of Education (CDE), supported by the DTSC, has been assigned primary responsibility for ensuring that any new properties acquired for school construction or existing school properties used for school expansion are free from hazardous conditions that would endanger the health or safety of students and staff. Requirements relevant to the evaluation of hazards are principally found in Education Code Sections 17072, 17210, 17213, 17215, 17251, and 17268.

School districts using state funding for site acquisition or expansion of existing school sites are required to receive approval from the CDE School Facilities Planning Division (SFPD) in order to proceed with project construction. In turn, the SFPD is required to certify to the California Office of Public School Construction (OPSC) that the school site is free from toxic contamination that would be unsafe for students and staff. Specific requirements of the Education Code are as follows:

Phase I ESA. Per Education Code Sections 17210 and 17213.1, prior to site acquisition (or if the District owns or leases a school site, prior to project construction), the District shall arrange for a qualified environmental assessor to prepare a Phase I ESA. If the Phase I ESA concludes that further investigation of the site is not required and the DTSC concurs, the District may proceed with the acquisition or construction project without further environmental investigation.

PEA. Per Education Code Section 17213.1, if the Phase I ESA and/or the DTSC conclude that further investigation of the site is needed, the District shall arrange for a qualified environmental assessor to conduct a PEA. The District shall also enter into an Environmental Oversight Agreement with the DTSC to oversee the preparation and implementation of the PEA. Alternatively, the District may elect to not pursue the acquisition or construction project. If the PEA concludes that further investigation of the site is not required and the DTSC concurs, the District may proceed with the acquisition or construction project. At the same time, the District shall make the PEA available for public review and comment. If the PEA determines that a release of hazardous material has occurred, the District may elect not to pursue the acquisition or construction project.

Response Actions. Per Education Code Section 17213.2, if the PEA discloses the presence of a hazardous materials release, or threatened release, or the presence of naturally occurring hazardous materials at a proposed school site at concentrations that could pose a significant risk to humans, and the District acquires or already owns the site, the District shall enter into a School Cleanup Agreement with the DTSC and undertake response actions to clean up the site. The District need not take action in response to a release of hazardous material to groundwater underlying the site if the release originates from an offsite source. However, the District is obligated to take response actions, as required, to protect future occupants of the site from potential health risks and hazards posed by the contaminated groundwater, such as the off-gassing of volatile organic compounds from underlying groundwater into building indoor air. The District may not begin construction of a school building until the DTSC determines that:

1) the construction will not interfere with the response action,

2) site conditions do not pose a significant threat to the health and safety of the construction workers, and

3) the nature and extent of the contamination have been thoroughly characterized.

If a previously unidentified release of hazardous materials is discovered during construction, the District shall cease all construction activities, notify the DTSC, and take actions necessary to address the release. The District may not occupy a school building following construction until the DTSC certifies that all necessary response actions, except for operation and maintenance activities, have been completed and the site no longer poses a significant risk to humans.

Environmental Hardship. Per Education Code Section 17072.13, a district may request environmental hardship status and secure state funding prior to final SFPD approval if the DTSC estimates that the necessary response action will take at least six months to complete and the SFPD determines that the site is the best available alternative site.

Site Hazards. Per Education Code Section 17213(a), a district may not acquire a school site unless it has determined that the property is not any of the following:

- The site of a current or former hazardous or solid waste disposal site, unless the site was a former solid waste disposal site and the wastes have been removed.
- A hazardous substance release site identified by the DTSC in a current list for removal or remedial action (see Section 5.8.1.2).
- A site that contains one or more pipelines (underground or aboveground) that convey hazardous substances, acutely hazardous substances, or hazardous wastes, unless it is a natural gas line that is used only to supply natural gas to the school or neighborhood.

Per Education Code Section 17251, the CDE shall advise a district on the suitability of a proposed school site, based on factors that include safety and reduction of traffic hazards. To assist with this evaluation, the CDE has established standards for use by districts to ensure that the design and construction of school facilities are educationally appropriate and promote school safety. The CDE also provides information relating to the impact or potential impact upon any school site of hazardous substances, solid waste, safety, and hazardous air emissions. The CDE has developed specific standards to implement Section 17251 of the Education Code known as "Title 5" requirements (discussed in detail under "California Code of Regulations" heading below).

Air Toxics. Per Education Code Section 17213(b), when preparing the CEQA support documents for a project, the District shall consult with the local air quality management district to identify facilities that might emit hazardous air emissions or handle hazardous or acutely hazardous materials, substances, or waste, including freeways and other busy traffic corridors, large agricultural operations, and rail yards within one-quarter mile of the site. Per Education Code Section 17213(c), if any such facilities are identified, the District must make one of the following findings:

- The health risks from the identified facilities do not and will not constitute an actual or potential endangerment of public health to persons who would attend or be employed at the school.

- Corrective measures required under order by another agency having jurisdiction over the facilities will, before the school is occupied, result in the mitigation of all chronic or accidental air emissions to levels that do not constitute an actual or potential endangerment of public health to persons who would attend or be employed at the proposed school. If this finding is made, the District shall make a subsequent finding, prior to occupancy at the school, that the emissions have been so mitigated.

Per Education Code Section 17213(c), the District must perform a health risk assessment if a proposed school site is within 500 feet of a freeway or other busy traffic corridor, and either 1) find that air emissions from the freeway pose no significant short-term or long-term health risk to pupils or 2) adopt a Statement of Overriding Considerations on the grounds the District is unable to locate an alternative site that is suitable due to a severe shortage of sites that meet the requirements of Section 17213(a).

Airport Safety. Per Education Code Section 17215, a district is required to provide the CDE written notice before acquiring title to property for a new school site if the proposed site is within two nautical miles of an airport runway or a potential runway included in an airport master plan. The CDE must then notify the California Department of Transportation (Caltrans), Division of Aeronautics, which in turn would investigate the proposed site and submit a written report of its findings, including recommendations concerning acquisition of the site. As part of the investigation, the owner and operator of the airport would be granted the opportunity to comment on the proposed school site. If the written report does not favor the acquisition of the property for a school site, state funds or local funds cannot be used for acquisition of, or school construction at, the site. Education Code Section 17215 does not apply to school sites acquired prior to January 1, 1966, nor to any additions or expansions to those sites. Specific Caltrans regulations that elaborate on the school site evaluation process are found in CCR Title 21, Division 2.5, Chapter 2.1, Section 3570.3 □

Applicability. Per Education Code Section 17268, school districts that are not using state funding for construction of a new school building still need to comply with Section 17213(a), as summarized above, for identification of hazardous or solid waste disposal site, hazardous substance release site, and hazardous substance pipeline. Districts that want to use state funding may not approve construction of a new school building or a school site on leased or acquired land unless it complies with the requirements of Sections 17213.1 and 17213.2, as summarized above. However, the District need not comply with the requirements of Sections 17213.1 and 17213.2 if the project is eligible for a statutory or categorical exemption under CEQA guidelines.

California Education Code, Title 1, Division 1, Part 10, Chapter 12.5, Section 17070 et seq.

The Leroy Greene School Facilities Act of 1998 (SB 50), created a new state program called the School Facility Program (SFP). The SFP is divided into five major programs: New Construction, Modernization, Critically Overcrowded Schools, Joint Use Projects, and Charter School Facilities. In order to obtain funding for new

school construction and modernization projects, school districts must interact with and obtain approval from several state agencies, including the CDE SFPD, State Allocation Board (SAB), Office of Public School Construction (OPSC), Division of the State Architect (DSA), and Department of Toxic Substances Control (DTSC). The roles and responsibilities of these agencies with respect to the SFP are summarized below.

Department of Toxic Substances Control

The DTSC is authorized by EPA to administer the hazardous waste laws and oversee remediation of hazardous wastes sites. Regulations require that DTSC "shall compile and update as appropriate, but at least annually, and shall submit to the Secretary for Environmental Protection, a list of all the following: (1) [a]ll hazardous waste facilities subject to corrective action pursuant to Section 25187.5 of the Health and Safety Code (HSC)."[10] The hazardous waste facilities identified in HSC Section 25187.5 are those where DTSC has taken or contracted for corrective action because a facility owner/operator has failed to comply with a date for taking corrective action in an order issued under the HSC, or because DTSC determined that immediate corrective action was necessary to abate an imminent or substantial endangerment.[11]

California Department of Conservation, Division of Oil, Gas, and Geothermal Resources

The Geologic Energy Management Division (CalGEM), formerly the California Department of Conservation, Division of Oil, Gas, and Geothermal Resources (DOGGR) oversees the drilling, operation, maintenance, and plugging and abandonment of oil, natural gas, and geothermal energy wells. CalGEM is mandated by Section 3106 of the Public Resources Code to supervise the drilling, operation, maintenance, and abandonment of oil and gas wells for the purpose of preventing (1) damage to life, health, property, and natural resources; (2) damage to underground and surface waters suitable for irrigation or domestic use; (3) loss of oil, gas, or reservoir energy; and (4) damage to oil and gas deposits by infiltrating water and other causes. The regulations can be found in the CCR, Title 14. DOGGR's Well Review Program assists developers in addressing issues associated with development near oil and gas wells.[12]

Emergency Response Plan

California has developed an emergency response plan to coordinate emergency services provided by federal, state, local government, and private agencies. Responding to hazardous materials incidents is one part of this plan. The plan is administered by the OES, which coordinates the responses of other agencies, including the California Environmental Protection Agency (Cal EPA), California Highway Patrol (CHP), the RWQCB, and the local fire department. The Los Angeles County Fire Department provides first response capabilities, if needed, for hazardous materials emergencies within the project area.

[10] California Government Code, Title 22, Section 65962.5.

[11] California Health and Safety Code, Section 25187.5.

[12] California Division of Oil, Gas, and Geothermal Resources. 2007. Well Review Program Introduction and Application. ftp://ftp.consrv.ca.gov/pub/oil/Well_Review_Program.pdf

California EPA

The California EPA oversees the DTSC whose mission it is to protect California's people and environment from harmful effects of toxic substances through the restoration of contaminated resources, enforcement, regulation, and pollution prevention. The DTSC regulates hazardous waste, cleans existing contamination, and looks for ways to reduce the hazardous waste produced in California. Approximately 1,000 scientists, engineers, and specialized support staff ensure that companies and individuals handle, transport, store, treat, dispose of, and clean-up hazardous wastes appropriately. Through these measures, DTSC contributes to greater safety for all Californians, and less hazardous waste reaches the environment.

California Occupational Safety and Health Administration

The California Occupational Safety and Health Administration (Cal OSHA) has set forth work requirements for disturbance of Asbestos Containing Construction Materials (ACCMs) including removal operations for all types of ACCMs. In addition, the agency has developed standards for general industry and the construction industry hazardous waste operations and emergency response. Cal OSHA ensures that employers must have controls to reduce and monitor exposure levels of hazardous materials, an informational program describing any exposure during operations and the inspection of drums and containers prior to removal or opening. Decontamination procedures and emergency response plans must be in place before employees begin working in hazardous waste operations.

California Office of Emergency Services

The California Office of Emergency Services (CAL OES) Hazardous Materials Section under the Fire and Rescue Division coordinates statewide implementation of hazardous materials accident prevention and emergency response programs for all types of hazardous materials incidents and threats. In response to any hazardous materials emergency, the section staff is called upon to provide state and local emergency managers with emergency coordination and technical assistance.

California Code of Regulations Title 8

This section of the California Code of Regulations (CCR) regulates asbestos exposure in all work defined in the Code's Section 1502 including demolition or salvage of structures where asbestos is present, removal or encapsulation of materials containing asbestos, construction, alteration, repair, maintenance, or renovation of structures, substrates, or portions thereof, that contain asbestos, installation of products containing asbestos, asbestos spill/emergency cleanup, transportation, disposal, storage, containment of and housekeeping activities involving asbestos or products containing asbestos, on the site or location at which construction activities are performed, and excavation which may involve exposure to asbestos as a natural constituent which is not related to asbestos mining and milling activities.

Hazardous Waste Control Act

The Hazardous Waste Control Act created the state hazardous waste management program, which is similar to but more stringent than the federal RCRA program. The act is implemented by regulations contained in Title 26 of the CCR, which describes the following required aspects for the proper management of hazardous waste:

identification and classification; generation and transportation; design and permitting of recycling, treatment, storage, and disposal facilities; treatment standards; operation of facilities and staff training; and closure of facilities and liability requirements. These regulations list more than 800 materials that may be hazardous and establish criteria for identifying, packaging, and disposing of such waste. Under the Hazardous Waste Control Act and Title 26, the generator of hazardous waste must complete a manifest that accompanies the waste from generator to transporter to the ultimate disposal location. Copies of the manifest must be filed with DTSC.

Unified Hazardous Waste and Hazardous Materials Management Regulatory Program

The Unified Hazardous Waste and Hazardous Materials Management Regulatory Program (Unified Program) requires the administrative consolidation of six hazardous materials and waste programs (Program Elements) under one agency, a CUPA. The Program Elements consolidated under the Unified Program are: Hazardous Waste Generator and On-site Hazardous Waste Treatment Programs (i.e., Tiered Permitting); Aboveground Petroleum Storage Tank Spill Prevention Control and Countermeasure Plan (SPCC); Hazardous Materials Release Response Plans and Inventory Program (i.e., "Hazardous Materials Disclosure" or "Community Right To Know"); California Accidental Release Prevention Program (Cal ARP); UST Program; and Uniform Fire Code Plans and Inventory Requirements. The Unified Program is intended to provide relief to businesses complying with the overlapping and sometimes conflicting requirements of formerly independently managed programs. The Unified Program is implemented at the local government level by CUPAs. Most CUPAs have been established as a function of a local environmental health or fire department. Some CUPAs have contractual agreements with another local agency, a participating agency, which implements one or more Program Elements in coordination with the CUPA.

California Vehicle Code

The California Vehicle Code (Title 13 of the CCR) establishes regulations for motor carrier transport of hazardous materials. For example, all motor carrier transporters of hazardous materials are required to have a Hazardous Materials Transportation license issued by the California Highway Patrol. In addition, placards identifying that hazardous materials are being transported must be displayed on the vehicle.

California Health and Safety Code The transport of hazardous waste materials is further governed by the California Health and Safety Code Section 25163 and Title 22, Chapter 13, of the CCR. Specifically, Section 25163 of the California Health and Safety Code requires transporters of hazardous waste to hold a valid registration issued by the DTSC in his/her possession while transporting hazardous waste. Additionally, Title 22, Chapter 13 of the CCR includes a number of requirements, which include, but are not limited to, the following:

- Transporters shall not transport hazardous waste without first receiving an identification number and a registration certificate from DTSC.
- Registration as a hazardous waste transporter expires annually, on the last day of the month in which the registration was issued.
- To be registered as a hazardous waste transporter, an application must be submitted.

- Hazardous waste shall not be accepted for transport without a Uniform Hazardous Waste Manifest that has been properly completed and signed by generator and transporter.

- Hazardous waste shall be delivered to authorized facilities only.

South Coast Air Quality Management District

The South Coast Air Quality Management District (SCAQMD) maintains rules and regulations pertaining to asbestos abatement. Air Quality Management District (AQMD) Rule 1403, adopted by the SCAQMD on October 6, 1989, establishes survey requirements, notification, and work practice requirements to prevent asbestos emissions from emanating during building renovation and demolition activities. Asbestos is a carcinogen and is categorized as a hazardous air pollutant by the EPA. As such, AQMD Rule 1403 incorporates the requirements of the federal asbestos requirements found in National Emission Standards for Hazardous Air Pollutants (NESHAP) found in the Code of Federal Regulations (CFR) Title 40, Part 61, Subpart M. The EPA delegated to SCAQMD the authority to enforce the federal asbestos NESHAP and the SCAQMD is the local enforcement authority for asbestos.

California Environmental Quality Act

Public Resources Code (PRC) Section 21151.8; 14 CCR Section 15186 contains requirements that apply to school site acquisition and construction projects. These sections require school districts to carefully evaluate potential risks to students, faculty, and other school district employees that may be posed by on-site and off-site sources of hazardous materials. In addition, new school acquisition and/or construction projects that receive funds from the state must undergo specific hazardous materials review process. For school projects that do not involve state funds, LAUSD OEHS oversees the environmental review process.

Local

City of Los Angeles General Plan

The Project site and the City of Los Angeles are subject to the emergency preparedness requirements of the City of Los Angeles General Plan Safety Element.[13] The Emergency Operations Organization (EOO) implements the City's General Plan Safety Element. The EOO is the operational department responsible for the City's emergency preparations (planning, training, and mitigation), response and recovery operations. The EOO centralizes command and information coordination to enable its unified chain-of-command to operate efficiently and effectively in managing the City's resources. Each City agency, in turn, has operational protocols, as well as plans and programs, to implement EOO protocols and programs. A particular emergency or mitigation triggers a particular set of protocols which are addressed by implementing plans and programs. These include hazard-specific plans (e.g., flood), situational contingency plans for known or anticipated events (e.g., annual L.A. Marathon) and pre- and post-event plans (e.g., Recovery and Reconstruction Plan). The City's emergency operations program encompasses all of these protocols, plans and programs. Therefore, its

[13] City of Los Angeles. November 1996. City of Los Angeles General Plan Safety Element, Exhibit H, Critical Facilities & Lifeline Systems. http://cityplanning.lacity.org/Cwd/GnlPln/SaftyElt.pdf

programs are not contained in one comprehensive document. The Safety Element goals, objectives and policies are broadly stated to reflect the comprehensive scope of the EOO.

Los Angeles Fire Code

The Los Angeles Fire Code is a component of the Los Angeles Municipal Code, comprised of a combination of the California Fire Code and City amendments. The Fire Code establishes requirements for providing a reasonable level of safety and property protection from the hazards of fire, explosion, panic or dangerous conditions in new and existing buildings, structures, and premises, and provides a reasonable level of safety to fire fighters and emergency responders during emergency operations.[14] The Los Angeles Fire Department (LAFD) monitors the storage of hazardous materials for compliance with local requirements. Specifically, businesses and facilities that store more than threshold quantities of hazardous materials as defined in Chapter 6.95 of the California Health and Safety Code are required to file an Accidental Risk Prevention Program with the LAFD. This program includes information such as emergency contacts, phone numbers, facility information, chemical inventory, and hazardous materials handling and storage locations. The LAFD also issues permits for hazardous materials handling and enforces California's Hazardous Materials Release Response Plans and Inventory Law (HSC Sections 25500 et seq.).

Basic requirements of California's Hazardous Materials Release Response Plans and Inventory Law include the development of detailed hazardous materials inventories used and stored on-site, a program of employee training for hazardous materials release response, identification of emergency contacts and response procedures, and reporting of releases of hazardous materials. Any facility that meets the minimum reporting thresholds must comply with the reporting requirements and file a Business Emergency Plan (BEP) with the local administering agency (i.e., LAFD). The LAFD also administers the applicable sections of the Los Angeles City Fire Code, including Division 8, Hazardous Materials Disclosures. Those businesses that store hazardous waste or hazardous materials must submit a Certificate of Disclosure to the LAFD.

Los Angeles Methane Seepage Regulations

The City has prepared a map of methane zones and methane zone buffer areas within the City. Los Angeles Municipal Code (LAMC), Chapter IX, Article 1, Division 71, Section 91.7103, also known as the Los Angeles Methane Seepage Regulations, establishes requirements for buildings and paved areas located in areas classified as being located either in a methane zone or a methane buffer zone. Requirements for new construction within such zones include methane gas sampling to determine the Site Design Level and, depending on the detected concentrations of methane and gas pressure at the site, application of design remedies for reducing potential methane impacts. The design remedies include Methane Control Systems that are based on the Site Design Level, with more involved mitigation systems required at the higher Site Design Levels. According to the Phase I ESA, the Project Site is not located within a city-designated Methane Hazard Zone (see Appendix 1-A).

[14] City of Los Angeles. November 2020. 2020 City of Los Angeles Fire Code. https://codes.iccsafe.org/content/CACLAFC2020P1/chapter-1-scope-and-administration

LAUSD Standard Conditions of Approval

Projects implemented under the 2023 SPEIR are anticipated to have less than significant impacts related to hazards and hazardous material within the LAUSD service area with the incorporation of Standard Conditions of Approval (SCs). Applicable SCs related to Project-specific impacts to hazards and hazardous material are provided in **Table 3.4-2, *Hazards and Hazardous Materials Standard Conditions of Approval***.

TABLE 3.4-2
HAZARDS AND HAZARDOUS MATERIALS STANDARD CONDITIONS OF APPROVAL

Applicable SC	Description
SC-HAZ-1	LAUSD shall determine the proximity of electromagnetic field (EMF) generators to new classrooms or outdoor play areas to ensure the EMF generator does not pose a threat. **Criteria for School Siting in Proximity to High Voltage Power Lines or Cell Towers** Board of Education resolutions (Effects of Non-Ionizing Radiation-2000, Wireless Telecommunication Installations – 2009 and T-Mobile – Cell Tower Notification and Condemnation-2009) regarding electromagnetic field (EMF) and radio frequency exposures associated with cellular towers near schools whereby a prohibition exists regarding siting towers on school campuses. LAUSD's screening perimeter for new classroom construction or outdoor play area is 200 feet from cell towers and 500 feet from high voltage power lines.
SC-HAZ-2	LAUSD shall determine the proximity of new classrooms or outdoor play areas to ensure that these new facilities are placed outside of the established exclusion zone. **Pipeline Safety Hazard Analysis** This document outlines the process for evaluating safety hazards associated with underground and above-ground natural gas and hazardous liquid pipelines. The pipeline safety hazard assessment (PSHA) process determines whether potential releases of natural gas, petroleum product, and crude oil from pipelines located near a school site pose a safety risk to students and staff.
SC-HAZ-3	LAUSD shall prepare a Rail Safety Study (RSS) for the construction of any new classrooms or outdoor play areas that would be located within 1,500 feet of an existing rail line. For construction on existing campuses, if a proposed scope of work has the potential to exacerbate a safety hazard, a RSS will be triggered. **Rail Safety Study Protocol** This document provides a guidance protocol for conducting a RSS. It is designed to assist in evaluating whether traffic on rail lines within a 1,500-foot radius of a school site poses an unreasonable safety hazard to students and staff at the school.
SC-HAZ-4	The Construction Contractor shall comply with the following OEHS Site Assessment practices and requirements (as applicable): • District Specification Section 01 4524, Environmental Import / Export Materials Testing. • Removal Action Workplan or Remedial Activities Workplan. • California Air Resources Board Rule 1466. • Guidelines and Procedures to Address Polychlorinated Biphenyls (PCBs) in Building Materials - particularly applicable to buildings that were constructed or remodeled between 1959 and 1979. • Lead and asbestos abatement requirements identified by the Facilities Environmental Technical Unit (FETU) in the Phase I / Phase II, or abatement plan(s).
SC-AQ-1	LAUSD shall complete a Health Risk Assessment for new campus locations that would place classrooms or play areas within close proximity (less than 0.25 mile) of existing sources of adverse emissions. LAUSD shall identify all permitted and non-permitted stationary sources, freeways and other busy traffic corridors, railyards, and large agricultural operations within 0.25 mile of the project. Once

TABLE 3.4-2
HAZARDS AND HAZARDOUS MATERIALS STANDARD CONDITIONS OF APPROVAL

Applicable SC	Description
	identified, make a determination about the need for qualitative evaluation, screening level evaluation in accordance with air district specific guidance and tools, or a refined evaluation with air dispersion modeling, to determine the if risks constitute an actual or potential endangerment of public health to persons who would attend or be employed at the school. For freeways and other busy traffic corridors within 500 feet, air dispersion modeling must be used to make the health risk determination (no screening, no qualitative discussion, etc.). The Health Risk Assessment shall comply with '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. The HRA must find that health risks are below criteria thresholds. If health risks which exceed air district criteria thresholds are identified, the school campus shall be redesigned or relocated to a site farther from the emissions generator.

3.4.3 Thresholds of Significance

The proposed Project would result in a significant impact if any of the following would occur:

a) Create a significant hazard to the public or the environment through the routine transport, storage, production, use, or disposal of hazardous materials.

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

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

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

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

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

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

Criteria (e), (f), and (g) were determined to result in no impacts or less than significant impacts by the Initial Study (see Appendix 1 to the EIR) and, therefore, are not carried forward for further analysis in the EIR.

3.4.4 Methodology

It is anticipated that Campus operations would be more efficient or would be otherwise improved following implementation of the proposed Project, which would result in new and upgraded facilities, and would not result in substantive changes to the existing operation of the school. Project implementation would not provide for an increase in the number of students attending the school or staff required to operate the school. As such, operational activities associated with the proposed Project are not additive to those operations analyzed in the 2023 SPEIR and would not result in substantial changes that have not previously been identified in the 2023 SPEIR. This analysis focuses on potential impacts associated with temporary use of hazardous materials associated with Project construction activity and ongoing operations of the school.

3.4.5 Impact Analysis

The proposed Project is a modernization project within the LAUSD's SUP and, therefore, would adhere to all requirements of the SUP framework, including the 2023 SPEIR.[15] Irving MS was identified as one of five schools in the District most in need of an upgrade due to the physical condition of the facilities.[16] As part of the proposed Project, several buildings would be demolished, and additional landscape and hardscape updates would be made (see Chapter 2, *Project Description*). SFPD requirements have been followed, and initial site assessments were conducted for hazards and hazardous materials. These assessments include a Phase I ESA and a subsequent PEA-E as required by the LAUSD Procedures for Environmental Review of Proposed projects (see Appendix 1-A and Appendix 1-F). The PEA-E has been reviewed by the LAUSD OEHS. The OEHS subsequently concurred with the findings and recommendations of the PEA-E, and a Draft SRP was prepared to be utilized to minimize potential exposures and offsite migration of potentially impacted soils during excavation, soil stockpiling, and transportation of soil offsite for disposal. The SRP (Appendix 4) estimates a total of 4,227 cubic feet (or 156.6 cubic yards) of arsenic- and asbestos-impacted soil that would be excavated from within the Project area.

[15] Los Angeles Unified School District. 2023. Subsequent Program EIR for the School Upgrade Program. http://achieve.lausd.net/ceqa

[16] Los Angeles Unified School District. November 15, 2022. Board of Education Report (File #: Rep-074-22/23). Approve the Redefinition of Five Major Modernization Projects at 49th Street Elementary School, Canoga Park High School, Garfield High School, Irving Middle School, and Sylmar Charter High School, and Amend the Facilities Services Division Strategic Execution Plan to Incorporate Therein.

Impact 3.4-1: The Project could create a significant hazard to the public or the environment through the routine transport, storage, production, use, or disposal of hazardous materials.

Pre-Construction

Pre-construction activities could result in significant impacts with regard to the routine transport, storage, production, use or disposal of hazardous materials as a result of removal and transport of potentially hazardous materials located within the building, removal and transport of a UST and removal and transport of impacted soils. The PEA-E determined if the soil with the highest concentrations of arsenic is removed (approximately 0.5 foot of topsoil), then the 95% Upper Confidence limit for arsenic can be reduced to 6.43 milligrams per kilogram (mg/kg), bringing it below the LAUSD's screening level of 12 mg/kg. Asbestos-impacted soil is a heath concern if the soil is disturbed, and the PEA-E recommended removal of the shallow soil prior to invasive activities at these locations in accordance with the SCAQMD Rule 1403 Asbestos Demolition and Removal standards.

As a result of the potential impacts of removal, transport, and disposal of impacted soils and the UST, CES developed a Draft SRP for the Project that addresses the transport, storage, and disposal of potentially hazardous soils on the site and subsequently addressed potential for impacts during pre-construction via a set of requirements for impacted soil transport and UST removal, which are outlined in the plan. The SRP provides instructions for excavation and offsite disposal of arsenic- and asbestos-impacted soil in accordance with LAUSD standards. The SRP also provides guidance procedures for removal of the former UST prior to the start of construction activities (Appendix 4). Finally, the SRP outlines required compliance measures with SCAQMD rule 1466 and 403 as the Project has a potential to release airborne volatile organic compounds (VOCs) during removal of the UST. Specific guidance is provided regarding SCAQMD requirements for air monitoring for VOCs. Additional safety measures, documentation, and cohesive planning to reduce impacts of impacted soils and UST removal have been identified in Mitigation Measures MM-HAZ-1: Soil Management Plan; MM-HAZ-2: SCAQMD Rule 1166 Monitoring during Soil Excavation; MM-HAZ-3: Dust Control Plan; and MM-HAZ-4: Compliance Inspections.

Compliance with the SRP and MM-HAZ-1 through MM-HAZ-4 during pre-construction activities is aligned with the guidance of the EPA's hazardous waste transportation regulations. The contaminated soils onsite will require transportation offsite, thereby creating a potential impact to the surrounding community. As outlined in the SRP, and MM-HAZ-1, transport of any contaminated soils will be conducted by an EPA and U.S. Department of Transportation (DOT) qualified transporter of hazardous materials as outlined in Title 40 of the code of Federal Regulations Part 263.[17] These requirements include obtaining an EPA ID number, complying with EPA's Hazardous Waste Manifest System, and obeying all applicable DOT hazardous materials regulations.

[17] U.S. Environmental Protection Agency. May 21, 2023. Hazardous Waste Transportation. https://www.epa.gov/hw/hazardous-waste-transportation

During demolition and disposal of asbestos-containing soils, there is a potential for hazardous particles to enter the air and soil. Any pre-construction soil removal that includes asbestos-impacted soils shall be completed in compliance with all regulations set forth in SCAQMD Rule 1403. These include surveying, notifications, ACM removal procedures and time schedules, as well as the handling, clean-up, storage, disposal, and landfilling of ACM. Rule 1403 also requires all operators to maintain records, including waste shipment records, appropriate warning labels, signs, and markings.[18] LAUSD OEHS Site Assessment Team manages environmental project activities related to site investigations of existing District properties and new acquisitions. State and local agencies, such as the DTSC and SCAQMD, have rules and regulations to address potentially toxic or hazardous conditions on or in the vicinity of existing school sites. The LAUSD Site Assessment Team should be consulted prior to construction activities to approve the routine transport, storage, production, use, or disposal of hazardous materials as a result of removal and transport of impacted soils as well as UST removal activities.

Compliance with the regulations discussed above, with instructions outlined in the SRP, and with the specific mitigation measure, MM-HAZ-1 through MM-HAZ-4 will limit the potential for impacts related to the routine transport, storage, production, use, or disposal of hazardous materials during pre-construction. Therefore, this impact would be less than significant.

Construction

Construction of the proposed Project could result in significant impacts with regard to the routine transport, storage, production, use, or disposal of hazardous materials due to the potential for the site to have residual impacted soils, and from demolition of asbestos or lead containing building materials. Compliance with MM HAZ-1 includes compliance with the EPA's hazardous waste transportation regulations. The potentially contaminated soils onsite will require transportation offsite, thereby creating a potential impact to the surrounding community. As outlined in the SRP and as required by MM-HAZ-1, transport of any contaminated soils will be conducted by an EPA and DOT qualified transporter of hazardous materials as outlined in Title 40 of the Code of Federal Regulations Part 263.[19] These requirements include obtaining an EPA ID number, complying with EPA's Hazardous Waste Manifest System, and obeying all applicable DOT hazardous materials regulations.

During demolition and disposal of asbestos-containing structures, there is a potential for hazardous particles to enter the air and soil. Any demolition activities that include asbestos removal shall be completed in compliance with all regulations set forth in SCAQMD Rule 1403. These include surveying, notifications, ACM removal procedures and time schedules, as well as the handling, clean-up, storage, disposal, and landfilling of ACM. Rule 1403 also requires all operators to maintain records including waste shipment records, appropriate warning labels, signs, and markings.[20] MM-HAZ-3 provides additional measures such as application of water, wind speed and wind direction monitoring, and airborne particulate monitoring to prevent hazardous particles from asbestos or impacted soils entering air space as a result of construction activities. Finally, site compliance

[18] Rule 1403. Asbestos Emissions from Demolition/Renovation Activities. October 5, 2007. https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1403.pdf

[19] U.S. Environmental Protection Agency. May 21, 2023. Hazardous Waste Transportation. https://www.epa.gov/hw/hazardous-waste-transportation

[20] Rule 1403. Asbestos Emissions from Demolition/Renovation activities. October 5, 2007. https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1403.pdf

inspections of the working areas shall be conducted by the Environmental Consultant or designated site manager to ensure ongoing compliance with regulations and mitigation measures as outlined in MM-HAZ-4.

Compliance with the regulations discussed above, with instructions outlined in the SRP, and with the specific mitigation measures MM-HAZ-1, MM-HAZ-3, and MM-HAZ-4 would limit the potential for impacts related to the routine transport, storage, production, use, or disposal of hazardous materials during construction to less than significant. Potential impacts associated with activities during construction would be less than significant with implementation of federal, state, local, and LAUSD regulations and compliance with MM-HAZ-1 and MM-HAZ-3.

Operation

The proposed Project would result in less than significant impacts during operation with regard to the routine transport, use, or disposal of hazardous materials during operation. The school's day-to-day operations do not require routine transport or use of significant amounts of hazardous materials. However, the school's lab classes and maintenance workers may produce small amounts of hazardous waste. Wastes generated by these sources shall be tracked and disposed of in accordance with all applicable LAUSD guidelines including, but not limited to, Disposal Procedures for Hazardous Waste and Universal Waste (REF-4149.2),[21] the LAUSD OEHS Environmental Guidance Manuals,[22] and the Environmental Compliance Guidance Manual for Science Centers guidelines,[23] which identifies types of hazardous waste that could be present at schools, LAUSD approved chemicals,[24] proper chemical storage and handling, and tracking, transport, and disposal of hazardous waste that may be present at the school.[25] Therefore, impacts during operation would be less than significant.

Significance Determination

Potentially Significant

Mitigation Measures

Implementation of the following mitigation measure is required to reduce impacts to hazards and hazardous materials during pre-construction and construction:

> **MM-HAZ-1: Soil Management Plan.** A soil management plan shall be required for all earth-moving construction activities conducted at the site. The purpose of the soil management plan is to provide

[21] Los Angeles Unified School District. June 12, 2020. Los Angeles Unified School District Reference Guide. Disposal Procedures for Hazardous Waste and Universal Waste. REF-4149.2. https://www.lausd.org/cms/lib/CA01000043/Centricity/Domain/135/REF-4149.2%20Hazardous%20Waste%20.pdf

[22] Los Angeles Unified School District Office of Environmental Health and Safety. 2020. Environmental Compliance/Hazardous Waste. https://www.lausd.org/Page/2798

[23] Los Angeles Unified School District. N.d. Environmental Guidance Manual for Science Centers. https://www.lausd.org/cms/lib/CA01000043/Centricity/domain/135/pdf%20files/EnvironmentalGuidanceManualforScienceCenters11-06.pdf

[24] Los Angeles Unified School District. January 21, 2005. LAUSD approved Chemicals list (inventory list) https://www.lausd.org/cms/lib/CA01000043/Centricity/Domain/135/Approved%20Chemical%2011-9-2023.pdf

[25] Los Angeles Unified School District Office of Environmental Health and Safety. 2014. Chemical Hygiene and Labels. https://www.lausd.org/Page/3987

guidance for identifying impacted soil and the proper handling, onsite management, and disposal of impacted soil that may be encountered during construction activities. The soil management plan shall be prepared by a licensed State of California Civil Engineer or Professional Geologist. The soil management plan shall include the following sections at a minimum.

- Introduction
- Background
- Potential Contaminants of Concern
- Contaminated Soil Management
- Health and Safety
- Excavation/Grading Contractor
- Identification of Contaminated Soil
- Excavation and Handling of Contaminated Soil
- Soil Staging
- Dust Mitigation and Track-Out Controls
- Stormwater Management
- Waste Characterization and Profiling
- Transportation Requirements and Procedures
- Requirements for Haulers
- Truck Loading Operations
- Transportation Route
- Traffic Control Procedures
- Shipment Documentation
- Contingency Plan
- Soil Sampling and Analysis Protocol
- Confirmation Soil Sampling
- Screening Levels
- Actions Based on Soil Results
- Reporting
- References

Before excavation or other soil-disturbing activities begin, a preparatory inspection must be conducted by the Contractor to ensure the proper soil management provisions, including initiation of the DigAlert notification(s) and stormwater Best Management Practices (BMPs) are evaluated.

MM-HAZ-2: SCAQMD Rule 1166 Monitoring During Soil Excavation – Implementation of the soil management plan shall include precautions and monitoring for soil potentially impacted by chemicals of concern previously identified. This mitigation measure specifically addresses air monitoring requirements during the underground storage tank (UST) removal activities prior to excavation and grading activities conducted during building renovation. During the UST removal activities air monitoring shall be implemented using a Photo-ionization Detector (PID) to monitor for

volatile organic compounds (VOCs). The PID shall have a 11.7 eV lamp and shall be calibrated daily using the manufacturer suggested calibration gas. If soil releasing VOCs above 50 parts per million by volume (ppmv) is identified, the South Coast Air Quality Management District (SCAQMD) shall be notified regarding the renovation work at the subject property. A site-specific permit shall be obtained for the Project due its location at a school property. Excavation activities shall be performed in compliance with all applicable SCAQMD regulations.

MM-HAZ-3: Dust Control Plan – A dust control plan shall be required for all construction activities conducted on the site. The primary dust control requirement is for no visible dust to exit the site during construction activities.

Dust control measures will be required daily during earth-moving activities to limit emissions of fugitive dust generated by their activities. The contractor is responsible for meeting requirements specified in Rule 403 and implementing reasonable Best Available Control Measures (BACMs) to minimize dust emissions. The following dust control measures shall be implemented to stabilize exposed surfaces and minimize suspended or tracked dust particles:

- Apply water to excavation areas to minimize dust generated by vehicles, trucks, and heavy equipment.
- Apply water to the staged soil piles before and during loading of trucks, and after completion of loading for the day.
- Adequately tarp truck trailers, and clean truck tires as necessary prior to leaving the Site. Place shaker plates on the ingress and egress routes to the Site.
- Cover and secure staged soil piles at the end of each day.

Wind speed and wind direction shall be monitored at 15-minute intervals using a tripod-mounted weather station with data logging capabilities.

Airborne particulate monitoring shall be conducted with aerosol monitors near the property boundary at locations upwind (one) and downwind (one) of excavation activities with an aggregate particle diameter of 10 microns or less (PM_{10}). The monitors shall provide real-time concentration and median particle size information and shall log the data at one-minute intervals for the duration of the monitoring period. The dust monitors shall be zeroed daily and an action level of 25 micrograms per cubic meter ($\mu g/m^3$) (per Rule 1466) shall be established and measured as the difference between upwind and downwind monitors.

MM-HAZ-4: Compliance Inspections – Site compliance inspections of the working areas shall be conducted by the Environmental Consultant or designated site manager to determine if any failed compliance has occurred. Stop-work orders shall be promptly issued if any failed compliance has occurred and corrective actions shall be immediately implemented to address the noncompliant issue.

Significance after Mitigation

Impacts would be less than significant after implementation of MM-HAZ-1 through MM-HAZ-4 and compliance with the SRP due to the requirements of precise excavation, handling, testing, transportation, and

disposal of arsenic and asbestos-impacted soil. The SRP and MM-HAZ-1 through MM-HAZ-4 address potential health risks to construction workers, onsite students and staff, and surrounding residents through implementation of a soil management process intended to close potential exposure routes to potentially impacted soils. Additionally, the plan will minimize offsite migration of potentially impacted soils during excavation, soil stockpiling, and transportation of soil offsite for disposal. As a result, the SRP and MM HAZ-1 through 4 would reduce impacts to a less than significant level in relation to the public or the environment through the routine transport, storage, production, use, or disposal of hazardous materials during construction.

Impact 3.4-2: The Project could create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials or waste into the environment.

Pre-Construction

The proposed Project would result in potentially significant impacts with regard to the upset and accident conditions involving the release of hazardous materials or waste into the environment. As discussed in the PEA-E, the Project site contains one unidentified UST located to the north of the Administration Building and arsenic and asbestos-impacted soil to a depth of six inches. Removal of the UST and contaminated soils, as well as their transport for disposal during construction, creates a potential for release of hazardous materials through upset or accident conditions. Potentially hazardous soils have been reported and identified in the site-specific SRP, and procedures for investigation, removal, transport, and disposal of the suspected UST are also outlined in the SRP. Additional measures to ensure no upset or accident conditions are encountered are outlined in MM-HAZ-1 through MM-HAZ-4. Compliance with the SRP for UST removal, as outlined in the project description, regulatory measures, and the additional requirements outlined in MM-HAZ-1 through MM-HAZ-4 will ensure the significant impacts with regard to the upset and accident conditions involving the release of hazardous materials or waste into the environment would be less than significant.

According to the Phase I ESA EDR report, Irving MS was listed in the following environmental databases: CERS Hazwaste, Hazmat, HAZNET, FTTS, RCRA-LQR, FINDS, and ECHO. Violations regarding failures to maintain Hazardous Waste Manifests, active generator permit, and improper labeling were reported in 2015, 2016, 2018, and 2019. The site is listed in the HAZNET database for the tracking of generated hazardous waste including asbestos-containing waste from 1990 to 2019; and laboratory waste, paint sludge, and organics from 1997 to 2014. The Phase I ESA conducted at the school identified several potentially hazardous materials that were unlabeled, or areas of the Administration Building that may contain hazardous materials but were not accessible at the time of the investigation. As a result of the unidentified potentially hazardous materials located in the basement of the Administration Building, there is potential for upset or accident conditions involving the release of hazardous materials or waste into the environment due to improper or incomplete removal of these materials before the start of construction. Therefore, removal of all materials from the school prior to demolition shall be conducted as outlined in the LAUSD OEHS Environmental Disposal Procedures for

Hazardous Waste and Universal Waste,[26] specifically in the paint storage room, Shop #1, the boiler room, and several locked rooms located at basement level of the Administration Building. Each of these locations were identified in the Phase I ESA as containing hazardous materials. With compliance with LAUSD guidelines, impacts regarding upset or accident conditions while removing unidentified hazardous materials would be less than significant.

Construction

The proposed Project would have less than significant impacts with regard to upset and accident conditions involving the release of hazardous materials or waste into the environment during construction due to the actions taken in pre-construction, and as a result of ongoing compliance with MM-HAZ-1 through MM-HAZ-4. As discussed above, compliance measures outlined in the SRP for removal of the UST and impacted soils prior to construction start would reduce the potential for contaminated soils to be present onsite. Compliance with LAUSD OEHS Environmental Disposal Procedures for Hazardous Waste and Universal Waste[27] would ensure no potentially hazardous materials are located onsite when construction activities start. Finally, continual compliance with MM-HAZ-1, 3, and -4, which outline additional requirements for soil management, dust control, and continual monitoring, would reduce the chance for upset and accident conditions and potential release of hazardous materials or waste into the environment during construction to a less than significant level.

Operation

The proposed Project would result in a less than significant impact to the public or the environment during operation through reasonably foreseeable upset and accident conditions involving the release of hazardous materials or waste into the environment because operation of the existing school would continue to comply with the LAUSD OEHS Environmental Guidance Manual for Maintenance and Operations, which addresses waste streams generated by operation and maintenance of a school facility and transportation and tracking requirements for disposal of hazardous wastes at a School Hazardous Waste Collection Consolidation Accumulation Facility.[28] These guidance documents include labeling and tracking of materials within the school to prevent potential accident conditions as a result of unidentified or improperly handled materials.

In addition, Irving MS is required to adhere to the Environmental Compliance Guidance Manual for Science Centers,[29] which identifies types of hazardous waste that could be present at schools, LAUSD approved chemicals,[30] proper chemical storage and handling including suggested chemical storage patterns, chemical

[26] Los Angeles Unified School District. June 12, 2020. Los Angeles Unified School District Reference Guide. Disposal Procedures for Hazardous Waste and Universal Waste. REF-4149.2 https://www.lausd.org/cms/lib/CA01000043/Centricity/Domain/135/REF-4149.2%20Hazardous%20Waste%20.pdf

[27] Los Angeles Unified School District. June 12, 2020. Los Angeles Unified School District Reference Guide. Disposal Procedures for Hazardous Waste and Universal Waste. REF-4149.2 https://www.lausd.org/cms/lib/CA01000043/Centricity/Domain/135/REF-4149.2%20Hazardous%20Waste%20.pdf

[28] Los Angeles Unified School District Office of Environmental Health and Safety. 2020. Environmental Compliance/Hazardous Waste. https://www.lausd.org/Page/2798

[29] Los Angeles Unified School District. N.d. Environmental Guidance Manual for Science Centers. https://www.lausd.org/cms/lib/CA01000043/Centricity/domain/135/pdf%20files/EnvironmentalGuidanceManualforScienceCenters11-06.pdf

[30] Los Angeles Unified School District. January 21, 2005. LAUSD Approved Chemicals List (inventory list) https://www.lausd.org/cms/lib/CA01000043/Centricity/Domain/135/Approved%20Chemical%2011-9-2023.pdf

storage compatibility categories, and proper labeling.[31] As a result, these impacts would be less than significant during school operation.

Significance Determination

Potentially Significant.

Mitigation Measures

Mitigation Measures MM-HAZ-1 through MM-HAZ-4, listed above, would reduce pre-construction and construction hazard impacts.

Significance after Mitigation

Impacted soils, the presence of a UST, and the presence of unidentified and potentially hazardous materials on the Project site pose impacts related to upset and accident conditions involving the release of hazardous materials or waste into the environment. Compliance with the SRP would ensure careful and proper removal of the UST, and the SRP outlines specific areas where impacted soils must be removed. MM-HAZ-1 would reduce the potential for accident conditions via detailed outline of contaminates of concerns and subsequent measures outlining soil management onsite, including, but not limited to, characterization, excavation and handling, staging, transportation, contingency plans, sampling, and reporting requirements. MM-HAZ-2 details specific requirements and action levels for monitoring for VOC's during UST removal, while MM-HAZ-3 outlines BACMs for dust and particulate management and outlines quantifiable monitoring requirements to be maintained from pre-construction through buildout. MM-HAZ-4 would ensure all regulations and mitigation measures are being met. Finally, compliance with LAUSD OEHS Environmental Disposal Procedures for Hazardous Waste and Universal Waste,[32] when disposing of hazardous materials currently stored on the school grounds, would reduce the impacts with regard to the upset and accident conditions involving the release of hazardous materials or waste into the environment to a less than significant level.

Impact 3.4-3: The Project could emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.

The proposed Project would result in significant impacts regarding hazardous emissions or handling of hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. During the construction phase, it is possible school attendants could come in contact with emissions of PCBs, asbestos, paints, petroleum products, or fugitive dust from soil (see Phase I ESA and PEA-E). However, SC-HAZ-04 would ensure that the following guidelines are followed: District Specification Section 01 4524, Environmental Import / Export Materials Testing; Soil Removal Plan; California Air

[31] Los Angeles Unified School District Office of Environmental Health and Safety. 2014. Chemical Hygiene and Labels. https://www.lausd.org/Page/3987

[32] Los Angeles Unified School District. June 12, 2020. Los Angeles Unified School District Reference Guide. Disposal Procedures for Hazardous Waste and Universal Waste. REF-4149.2 https://www.lausd.org/cms/lib/CA01000043/Centricity/Domain/135/REF-4149.2%20Hazardous%20Waste%20.pdf

Resources Board Rule 1466 Guidelines and Procedures to Address PCBs in Building Materials, particularly applicable to buildings that were constructed or remodeled between 1959 and 1979; lead and asbestos abatement requirements identified by the FETU in the Phase I/Phase II; or abatement plan(s). It should be noted that the school is located within a moderate radon zone.[33] The Phase I ESA listed the school as being located in a high radon zone. The high radon zone is defined as having a high potential for radon levels to be above 4 pCi/L. As stated in the Los Angeles Unified School District Reference Guide REF-5314.2, Procedures for Environmental Review of Proposed Projects: "building design and construction Measures – Should a building or similar structure be constructed or renovated for student and/or staff occupancy and is located in a 'high' radon zone, U.S. EPA guidance entitled 'Radon Prevention in the Design and Construction of Schools and Other Large Buildings, EPA/625/R-92/016, June 1994' (or latest published version) shall be followed and all relevant and appropriate measures incorporated in its design and construction to prevent radon gas infiltration" (see the LAUSD Radon Memorandum in Appendix 1-A). Although the Phase I ESA states the Project site is located in a "high radon zone," Sapphos Environmental, Inc. reviewed the California Department of Conservation Map of Indoor Radon Potential, which listed the Project site as being in a moderate zone for indoor radon potential.[34] The LAUSD Office of Environmental Health and Safety does not require radon testing or mitigation for school sites in moderate radon zones.[35]

Pre-Construction

The proposed Project would result in significant impacts regarding hazardous emissions or handling hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school due to the Project's location on a school campus, and the identification of contaminated soils, asbestos, and a UST within the Project boundaries. Impacts associated with activities during pre- construction activities would be less than significant with implementation of MM-HAZ-1 through MM-HAZ-4 and compliance with the SRP.

The PEA-E reported hazardous materials in soil including arsenic and asbestos, an existing former UST, ACM, and undisclosed materials in the basement level of the administration building. The contaminated soils, UST, and ACM and their handling shall be managed through compliance with the SRP, as well as additional soil management requirements outlined in MM-HAZ-1; air monitoring requirements for VOCs during removal of the UST, as outlined in MM-HAZ-2; specific particulate monitoring requirements and dust control BMPs outlined in MM-HAZ-3; and ongoing compliance inspections outlined in MM-HAZ-4. In addition, all activities must adhere to all applicable LAUSD, local, state, and federal laws and regulations, specifically when removing potentially hazardous materials from the basement level of the Administration Building, which contained various substances that were either labeled as hazardous or could not be identified. The removal and handling of undisclosed materials within the building prior to demolition shall be conducted in accordance with the

[33] California Department of Conservation. 2016. Indoor Radon Potential Map. https://maps.conservation.ca.gov/cgs/radon (accessed October 30, 2023).

[34] California Department of Conservation. 2016. Indoor Radon Potential. https://maps.conservation.ca.gov/cgs/radon/ (accessed February 26, 2024).

[35] Los Angeles Unified School District. June 12, 2017. Reference Guide. Procedures for Environmental Review of Proposed Projects. https://www.lausd.org/cms/lib/CA01000043/Centricity/Domain/135/Ref_Guide_5314.2_Procedures_for_Envir_Rev_of_Proposed_Projects_w_Att.pdf

LAUSD OEHS Environmental Guidance Manual for Maintenance and Operations, which addresses waste streams generated by operation and maintenance of a school facility and transportation and tracking requirements for disposal of hazardous wastes at a School Hazardous Waste Collection Consolidation Accumulation Facility.[36] These guidance documents include directions for the tracking, transport, and disposal of hazardous waste that could be present at the school**.** As a result of these measures, the impacts related to handling hazardous or acutely hazardous substances or waste within one-quarter mile of an existing or proposed school would be reduced to a less than significant level during pre-construction activities.

Construction

Some phases of construction may be conducted during school operating hours. Due to the impacted soils and the potential presence of asbestos and arsenic, there would be significant impacts regarding hazardous emissions or handling hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. These impacts would be reduced through compliance with the SRP, proper removal of potentially hazardous materials from the construction site prior to construction, and MM-HAZ-1 through 4 during pre-construction. The residual impacts would be further mitigated via continued compliance with MM-HAZ-1, MM-HAZ-3, and MM-HAZ-4 for the entirety of construction activities. As a result, the impacts related to handling hazardous or acutely hazardous substances or waste within one-quarter mile of an existing or proposed school would be reduced to a less than significant level during construction.

Operation

The proposed Project would comply with the LAUSD OEHS Environmental Guidance Manual for Maintenance and Operations, which addresses waste streams generated by operation and maintenance of a school facility and transportation and tracking requirements for disposal of hazardous wastes at a School Hazardous Waste Collection Consolidation Accumulation Facility.[37] In addition, Irving MS is required to adhere to the Environmental Compliance Guidance Manual for Science Centers,[38] which identifies types of hazardous waste that could be present at schools, identifies LAUSD approved chemicals,[39] proper chemical storage, and handling.[40] Therefore, the proposed Project would result in less than significant impacts with regard to hazardous emissions or handling hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school during operation.

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36 Los Angeles Unified School District Office of Environmental Health and Safety. 2020. Environmental Compliance/Hazardous Waste. https://www.lausd.org/Page/2798

37 Los Angeles Unified School District Office of Environmental Health and Safety. 2020. Environmental Compliance/Hazardous Waste. https://www.lausd.org/Page/2798

38 Los Angeles Unified School District. N.d. Environmental Guidance Manual for Science Centers. https://www.lausd.org/cms/lib/CA01000043/Centricity/domain/135/pdf%20files/EnvironmentalGuidanceManualforScienceCenters11-06.pdf

39 Los Angeles Unified School District Office of Environmental Health and Safety. January 21, 2005. LAUSD Approved Chemical List (Inventory List). https://www.lausd.org/cms/lib/CA01000043/Centricity/Domain/135/Approved%20Chemical%2011-9-2023.pdf

40 Los Angeles Unified School District Office of Environmental Health and Safety. 2014. Chemical Hygiene and Labels. https://www.lausd.org/Page/3987

Significance Determination

Potentially Significant.

Mitigation Measures

Mitigation Measures MM-HAZ-1 through MM-HAZ-4 would reduce pre-construction and construction hazard impacts.

Significance after Mitigation

Impacted soils, the presence of a UST, and the presence of unidentified and potentially hazardous materials on the Project site would result in impacts related to emitting hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. Compliance with the SRP would ensure careful and proper removal of the UST, and the SRP outlines specific areas where impacted soils must be removed. MM HAZ-1 would reduce accident conditions via detailed outline of potential contaminates of concerns and subsequent measures to completely manage soil onsite including but not limited to characterization, excavation and handling, staging, transportation, contingency plans, as well as sampling and reporting requirements. MM-HAZ-2 details specific requirements and action levels for monitoring for VOCs during UST removal, while MM-HAZ-3 outlines BACMs for dust and particulate management and outlines quantifiable monitoring requirements to be maintained from pre-construction to final completion. MM-HAZ-4 would ensure all regulations and mitigation measures are being met. Finally, compliance with LAUSD OEHS Environmental Disposal Procedures for Hazardous Waste and Universal Waste[41] when disposing of hazardous materials currently stored on the school grounds would reduce the impacts related to emitting hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school to be a less than significant level.

Impact 3.4-4: The project would be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code § 65962.5 and, as a result, would it create a significant hazard to the public or the environment.

The site is not listed on the DTSC EnviroStor database or the SWRCB GeoTracker database.[42,43] The Project site is not listed as a known hazardous waste site. The Los Angeles County Department of Public Health, Los Angeles RWQCB, LACFD, and DTSC reported that they had no files pertaining to the site address. No records

[41] Los Angeles Unified School District. June 12, 2020. Los Angeles Unified School District Reference Guide. Disposal Procedures for Hazardous Waste and Universal Waste. REF-4149.2 https://www.lausd.org/cms/lib/CA01000043/Centricity/Domain/135/REF-4149.2%20Hazardous%20Waste%20.pdf

[42] California Department of Toxic Substances Control (DTSC). N.d. EnviroStor: 3010 Estara Ave, Los Angeles, CA 90065. Available at: https://www.envirostor.dtsc.ca.gov/public/map/?myaddress=3010+Estara+Ave+Los+Angeles (accessed August 10, 2023).

[43] California State Water Resources Control Board. N.d. GeoTracker: 3010 Estara Ave, Los Angeles, CA 90065. Available at: https://geotracker.waterboards.ca.gov/map/?CMD=runreport&myaddress=3010+Estara+Ave+Los+Angeles (accessed August 10, 2023).

indicating the presence of any environmental conditions were provided by SCAQMD. However, during site investigations, several recognized environmental conditions were identified.

Pre-Construction

The proposed Project would result in impacts regarding creating a significant hazard to the public or the environment due to location on a listed hazardous materials site. A PEA-E was conducted to address data gaps from the Phase I ESA investigation. The PEA-E was conducted on May 20–21, June 23, and July 21, 2023. Soil samples were collected from 0.5, 2.5 and 5 feet below ground surface (bgs) and were screened for chemicals of potential concern including lead, arsenic, OCPs, PCBs, TPH, PAHs, and asbestos (Chrysotile). The PEA-E identified elevated levels of lead in 10 locations during initial screening and elevated levels of arsenic in eight locations during initial screening. Asbestos was detected in two locations. In addition to soil sampling, a geophysical investigation was conducted on the parking lot area adjacent to the Administration Building due to the suspected presence of an underground storage tank. Two significant anomalies were detected during this investigation within a 35-foot by 100-foot area, both of which are typical of those associated with a UST. It was determined that a UST and concrete containment layer were present, and sampling results confirmed the presence of gasoline, diesel, and oil range hydrocarbons with the highest concentration coming from diesel-range hydrocarbons at 3,400 mg/kg at approximately 13 feet, 8 inches bgs. It is anticipated that there was piping associated with the UST, but the exact location was not identified. The UST is not identified on the GeoTracker database, which identifies known Leaking Underground Storage Tanks (LUST) and their associated cleanup sites; however, it may be added to this site pending further investigation of the UST. The UST and contaminated soils would be removed in accordance with the SRP and in compliance with MM-HAZ-2, and the Project would comply with MM-HAZ-1 for the entirety for construction activities, including tracking and documentation of site conditions with appropriate agencies, thereby reducing this impact to a less than significant level.

Operations

The Phase I ESA investigation found that, according to the EDR database report, the site is listed in the FTTS, CERS Hazwaste, Hazmat, HAZNET, RCRA-LQG, FINDS and ECHO databases. The site is listed in the FTTS database for a probably lead-based paint investigation in 2005. The site is listed in the RCRA-LQG, CERS Hazwaste and Hazmat databases for the tracking of generated hazardous waste. Violations regarding failures to maintain hazardous waste manifests, active generator permits, and improper labeling were reported in 2015, 2016, 2018, and 2019. The site is listed in the HAZNET database for the tracking of generated hazardous waste including asbestos-containing waste from 1990 to 2019; and laboratory waste, paint sludge, and organics from 1997 to 2014. It should be noted that the site is listed in these databases for tracking purposes and, therefore, its presence on these sites does not represent an environmental concern, and the potential to create a significant hazard to the public or the environment is low. Compliance with all applicable LAUSD tracking, labeling, storing and disposal guidance[44] would ensure that this impact would be less than significant.

[44] Los Angeles Unified School District Office of Environmental Health and Safety. 2020. Environmental Compliance/Hazardous Waste. https://www.lausd.org/Page/2798

Significance Determination

Potentially Significant.

Mitigation Measures

Mitigation Measures MM-HAZ-1 and MM-HAZ-2 would reduce pre-construction and construction hazard impacts.

Significance after Mitigation

Compliance with the SRP and MM-HAZ-2 for removal of the UST would result in impacts that are less than significant with regard to the site being included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 during pre-construction. MM-HAZ-2 requires that samples are collected around the site of the UST to identify whether the tank had been leaking and exposed surrounding soils to VOCs. Pending the results of the required sampling, the tank may need to be reported to the California Waterboard GeoTracker database, which would support tracking of cleanup and prevent potential hazards to the public or environment due to an unidentified LUST. Compliance with MM-MAZ-1 for the entirety of construction activities including tracking and reporting site conditions to appropriate agencies as well as compliance with all LAUSD guidelines for tracking, labeling, and disposing of chemicals onsite prior to construction and during operations and maintenance would result in impacts that are less than significant during construction and operation. As a result of compliance with the SRP and MM-HAZ-1 and MM-HAZ-2, there would not be a significant hazard to the public or the environment with regard to the site being included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. Therefore, the impacts would be less than significant with the implementation of mitigation measures.

3.4.6 Cumulative Impacts

There would be no cumulative impacts in relation to the transport, storage, production, use, or disposal of hazardous materials because the proposed Project, any additional projects being completed on the school campus, and any surrounding projects would be required to adhere to project/use specific, local, state and federal regulations related to the transportation, storage, production, use or disposal of hazards and hazardous waste materials. The proposed Project would adhere to MM-HAZ-1 during the pre-construction phase where potentially hazardous soils are to be removed and, therefore, would not create a cumulative impact with any other hazardous waste transportation that regularly happens on the Campus. There would be no cumulative impacts in relation to creating a significant hazard to the public or the environmental through reasonably foreseeable upset and accident conditions involving the release of hazardous materials or waste into the

[44] Los Angeles Unified School District. N.d. Environmental Guidance Manual for Science Centers. https://www.lausd.org/cms/lib/CA01000043/Centricity/domain/135/pdf%20files/EnvironmentalGuidanceManualforScienceCenters11-06.pdf

[44] Los Angeles Unified School District Office of Environmental Health and Safety. January 21, 2005. LAUSD Approved Chemical List (Inventory List). https://www.lausd.org/cms/lib/CA01000043/Centricity/Domain/135/Approved%20Chemical%2011-9-2023.pdf

[44] Los Angeles Unified School District Office of Environmental Health and Safety. 2014. Chemical Hygiene and Labels. https://www.lausd.org/Page/3987

environment as the proposed Project would be required to adhere to MM-HAZ-1 and MM-HAZ-4 and would subsequently avoid the potential for accidental release. Each project stage would be subject to these mitigation measures and, therefore, there is no potential for a cumulative impact related to emitting hazardous emissions or handling hazardous materials within one-quarter mile of an existing or proposed school as the nearest school is the Project site. There would not be additional work efforts happening in conjunction with the construction phases of the proposed Project. There may be ongoing maintenance activities that would occur throughout the Campus during operation of the proposed Project; however, maintenance projects would not have the same scope or scale associated with the proposed Project and are not anticipated to generate significant hazardous wastes. Additionally, compliance with MM-HAZ-2 and MM-HAZ-3 would avoid cumulative impacts related to hazardous emissions on the school grounds. There would be no cumulative impacts in relation to inclusion on a list of hazardous materials sites as the site is not located on a hazardous waste site and the proposed Project would not change that. Collectively, all potentially significant impacts would be mitigated through the SRP, MM-HAZ-1 through MM-HAZ-4, and state, federal, and LAUSD regulations for the identification, handling, transport, reporting, and disposal of hazardous materials identified on the site.

Significance Determination

No Impact.

Mitigation Measures

No mitigation measures are required.

3.4.7 References

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3.5 Noise

This section analyzes potential noise and vibration impacts that would result from the proposed Project. The analysis describes the existing noise environment in the Project area, estimates future noise and vibration levels at surrounding land uses resulting from construction and operation of the proposed Project, and identifies the potential for significant impacts. An evaluation of the proposed Project's contribution to potential cumulative noise impacts is also provided. Noise worksheets and technical information and data used in this analysis are provided in Appendix 7, *Noise Background and Modeling Data*, of this Draft EIR.

3.5.1 Environmental Setting

Fundamentals of Noise

Noise Principals and Descriptors

Sound, traveling in the form of waves from a source, exerts a sound pressure level (referred to as sound level) that is measured in decibels (dB), which is the standard unit of sound amplitude measurement. The dB scale is a logarithmic scale that describes the physical intensity of the pressure vibrations that make up any sound, with 0 dB corresponding roughly to the threshold of human hearing and 120 to 140 dB corresponding to the threshold of pain. Pressure waves traveling through air exert a force registered by the human ear as sound.

Sound pressure fluctuations can be measured in units of hertz (Hz), which correspond to the frequency of a particular sound. Typically, sound does not consist of a single frequency, but rather a broad band of frequencies varying in levels of magnitude, with audible frequencies of the sound spectrum ranging from 20 to 20,000 Hz. The sound pressure level, therefore, constitutes the additive force exerted by a sound corresponding to the sound frequency/sound power level spectrum. The typical human ear is not equally sensitive to this frequency range. As a consequence, when assessing potential noise impacts, sound is measured using an electronic filter that deemphasizes the frequencies below 1,000 Hz and above 5,000 Hz in a manner corresponding to the human ear's decreased sensitivity to these extremely low and extremely high frequencies. This method of frequency filtering, or weighting, is referred to as A-weighting, expressed in units of A-weighted decibels (dBA), which is typically applied to community noise measurements.

A wide variation in individual thresholds of annoyance to noise exists, and different tolerances to noise tend to develop based on an individual's past experiences with noise. Thus, an important way of predicting a human reaction to a new noise environment is the way it compares to the existing environment to which one has adapted (i.e., comparison to the ambient noise environment). In general, the more a new noise level exceeds the previously existing ambient noise level, the less acceptable the new noise level will be judged by those hearing it. With regard to increases in A-weighted noise level, the following relationships generally occur:

- Except in carefully controlled laboratory experiments, a change of 1 dBA in ambient noise levels cannot be perceived
- Outside of the laboratory, a 3 dBA change in ambient noise levels is considered to be a barely perceivable difference

- A change in ambient noise levels of 5 dBA is considered to be a readily perceivable difference; and
- A change in ambient noise levels of 10 dBA is subjectively heard as doubling of the perceived loudness.

These relationships occur in part because of the logarithmic nature of sound and the decibel scale. The human ear perceives sound in a nonlinear fashion; therefore, the dBA scale was developed. Because the dBA scale is based on logarithms, two noise sources do not combine in a simple additive fashion, but rather logarithmically. Under the dBA scale, a doubling of sound energy corresponds to a 3 dBA increase. In other words, when two sources are each producing sound of the same loudness, the resulting sound level at a given distance would be approximately 3 dBA higher than one of the sources under the same conditions. For example, if two identical noise sources produce noise levels of 50 dBA, the combined sound level would be 53 dBA, not 100 dBA. Under the dB scale, three sources of equal loudness together produce a sound level of approximately 5 dBA louder than one source, and 10 sources of equal loudness together produce a sound level of approximately 10 dBA louder than the single source.

Noise Attenuation

When noise propagates over a distance, the noise level reduces with distance depending on the type of noise source and the propagation path. Noise from a localized source (i.e., point source) propagates uniformly outward in a spherical pattern, referred to as "spherical spreading." Stationary point sources of noise, including stationary mobile sources such as idling vehicles, attenuate (i.e., reduce) at a rate between 6 dBA for acoustically "hard" sites and 7.5 dBA for "soft" sites for each doubling of distance from the reference measurement, as their energy is continuously spread out over a spherical surface (e.g., for hard surfaces, 80 dBA at 50 feet attenuates to 74 dBA at 100 feet, 68 dBA at 200 feet). Hard sites are those with a reflective surface between the source and the receiver, such as asphalt or concrete surfaces or smooth bodies of water. Soft sites have an absorptive ground surface, such as soft dirt, grass, or scattered bushes and trees, which in addition to geometric spreading, provides an excess ground attenuation value of 1.5 dBA (per doubling distance).

Roadways and highways consist of several localized noise sources on a defined path, and hence are treated as "line" sources, which approximate the effect of several point sources. Noise from a line source propagates over a cylindrical surface, often referred to as "cylindrical spreading." Line sources (e.g., traffic noise from vehicles) attenuates at a rate between 3 dBA for hard sites and 4.5 dBA for soft sites for each doubling of distance from the reference measurement. Therefore, noise due to a line source attenuates less with distance than that of a point source with increased distance.

Fundamentals of Vibrations

Vibration can be interpreted as energy transmitted in waves through the ground, or man-made structures, which generally dissipate with distance from the vibration source. Because energy is lost during the transfer of energy from one particle to another, vibration becomes less perceptible with increasing distance from the source.

There are several different methods that are used to quantify vibration. The peak particle velocity (PPV) is defined as the maximum instantaneous peak of the vibration signal in inches per second (in/sec), and is most frequently used to describe vibration impacts to buildings. The effects of ground-borne vibration include movement of the building floors, rattling of windows, shaking of items on shelves, or hanging on walls, and

rumbling sounds. In extreme cases, the vibration can cause damage to buildings. Building damage is not a factor for most projects, with the occasional exception of blasting and pile-driving during construction. Annoyance from vibration often occurs when the vibration levels exceed the threshold of perception by only a small margin. A vibration level that causes annoyance will be well below the damage threshold for normal buildings.

Sensitive Receptors

Some land uses are considered more sensitive to ambient noise levels than are others, due to the amount of noise exposure (in terms of both exposure duration and insulation from noise) and the types of activities typically involved. According to the City of Los Angeles General Plan, residential areas are considered to be the most sensitive type of land use to noise, and industrial/commercial areas are considered to be the least sensitive. Land uses considered noise sensitive by the City of Los Angles CEQA Thresholds Guide include residences, schools, libraries, churches, playgrounds, hospitals, nursing homes, and neighborhood parks.[1] Irving MS is considered a sensitive receptor during the school year, when school is in session and students and faculty are on the Campus. The nearest sensitive receptors are located directly adjacent to the western border of the proposed Project site, where there are three residential parcels along West Avenue 52 (see **Figure 3.3-1, *Sensitive Receptors***). In addition to single- and multi-family residences within vicinity of the proposed Project site, Fletcher Drive Elementary School is located to the northeast of Irving MS, across Estara Avenue.

Ambient Noise Levels

Schools can generate noise from sports events, athletic fields, playgrounds, and parking lot activity, and some of these features may potentially cause noise increases at nearby receptors, as schools are typically located in residential areas. Irving MS is predominantly surrounded by single- and multi-family residential uses, schools, and commercial uses.

To establish existing ambient noise levels, ambient noise measurements were conducted at four locations, representing the nearest land uses in the vicinity of the Project site. The measurement locations, along with existing development, are shown on **Figure 3.5-1, *Noise Measurement Locations***. Noise monitoring was conducted at four locations near the proposed Project site, for 1 hour at each location. Ambient noise measurements were recorded with a Larson Davis Spartan 730 Noise Dosimeter (serial number 10381; 10382; 10383; 10385), which meets and exceeds the minimum industry standards performance requirements provided by the American National Standard Institute (ANSI) S1.4 (Appendix 7). The dosimeter was calibrated and measuring guidelines were consulted prior to recording measurements. The dosimeter was operated according to the manufacturer's written specifications. The ambient noise conditions range from 57.7 to 66.7 L_{eq}, consistent with the existing land uses (**Table 3.5-1, *Ambient Noise Levels***; Appendix 7). The peak noise levels during the measurements were due to vehicular use of residents surrounding the Project site.

[1] City of Los Angeles. 2005. L.A. CEQA Thresholds Guide. https://planning.lacity.gov/eir/CrossroadsHwd/deir/files/references/A07.pdf [2] City of Los Angeles Department of City Planning. Adopted 3 February 1998. Noise Element of the Los Angeles City General Plan. https://planning.lacity.org/odocument/b49a8631-19b2-4477-8c7f-08b48093cddd/Noise_Element.pdf

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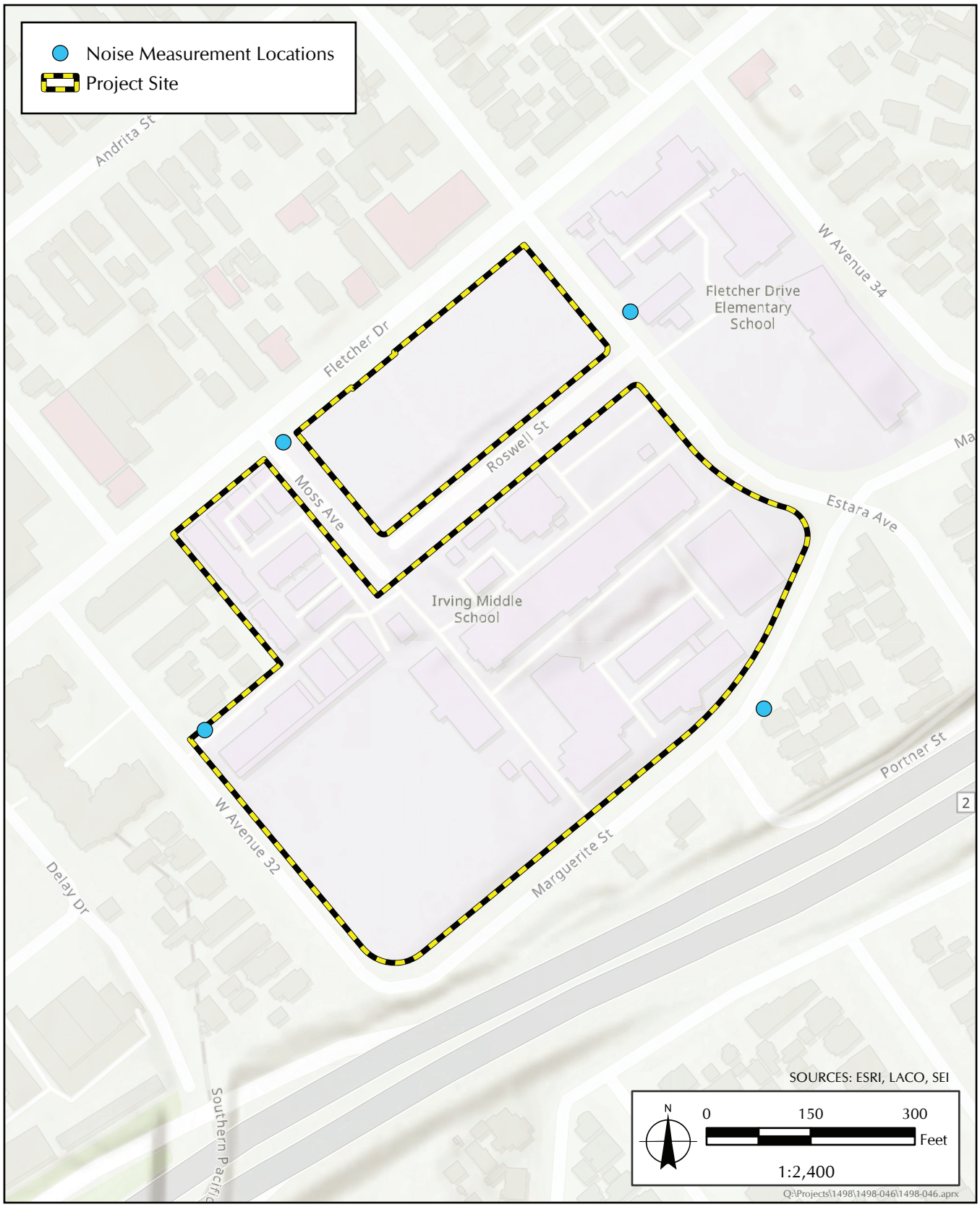

FIGURE 3.5-1

Noise Measurement

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TABLE 3.5-1
AMBIENT NOISE LEVELS

Location	Serial #	Date	Start Time	End Time	Leq	Max
1	10382	08/22/23	08:53:48	09:53:48	57.7	69.9
2	10381	08/22/23	09:59:37	10:59:37	63.5	86.7
3	10382	08/22/23	11:02:25	12:03:22	66.7	86.6
4	10383	08/22/23	12:08:51	13:08:51	65.3	82.5

Existing Groundborne Vibration Levels

Aside from periodic construction work that may occur throughout the City, sources of groundborne vibration in the Project site vicinity may include heavy-duty vehicular travel (e.g., refuse trucks, delivery trucks, etc.) on local roadways. According to the Federal Transit Administration (FTA), rubber-tire vehicles rarely create ground-borne vibration problems unless there is a discontinuity, or bump, in the road that causes the vibration. A typical bus operating on smooth roadway would generate groundborne vibration velocity levels of approximately 63 vibration decibels (VdB) (approximately 0.006 in/sec PPV) at 50 feet.

3.5.2 Regulatory Setting

A number of statutes, regulations, plans and policies have been adopted which address noise and vibration concerns. Detailed below is a discussion of the relevant regulatory setting and noise and vibration regulations, plans, and policies.

Federal

The 2023 SPEIR uses the FTA's guidance, the 2006 *Transit Noise and Vibration Impact Assessment*, to evaluate vibration levels resulting from Project construction activities on human annoyance and structural damage. Based on this guidance, the vibration standards are presented in **Table 3.5-2, *FTA Construction Vibration Impact Criteria for Building Damage***.

TABLE 3.5-2
FTA CONSTRUCTION VIBRATION IMPACT CRITERIA FOR BUILDING DAMAGE

Building Category	PPV (in/sec)
I. Reinforced-concrete, steel or timber (no plaster)	0.5
II. Engineered concrete and masonry (no plaster)	0.3
III. Non-engineered timber and masonry buildings	0.2
IV. Buildings extremely susceptible to vibration damage	0.12

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

State

Under California Code of Regulations (CCR) Title 5, the California Department of Education (CDE) regulations require the school district to consider noise in the site selection process. As recommended by CDE guidance, if a school district is considering a potential school site near a freeway, or other source of noise, it should hire an acoustical engineer to determine the level of sound that the site is exposed to and to assist in designing the school should that site be chosen.

CCR Title 24 establishes the California Building Code (CBC). The most recent building standard adopted by the legislature and used throughout the state is the 2016 version, which took effect on January 1, 2017. The State of California's noise insulation standards are codified in the CBC (Title 24, Part 2, Chapter 12). These noise standards are for new construction in California for the purposes of interior compatibility with exterior noise sources. The regulations specify that acoustical studies must be prepared when noise-sensitive structures, such as residential, schools, or hospitals, are near major transportation noises, and where such noise sources create an exterior noise level of 60 dBA CNEL, or higher. Acoustical studies that accompany building plans must demonstrate that the structure has been designed to limit interior noise in habitable rooms to acceptable noise levels. For new residential buildings, schools, and hospitals, the acceptable interior noise limit for new construction is 45 dBA CNEL.

State Guidelines

The State of California has developed a Land Use Compatibility Matrix for community noise environments that further defines the four categories of acceptance and assigns community noise equivalent level (CNEL) values to them (**Table 3.5-3, *Community Noise Exposure by Land Use Category***). Pursuant to the State Land Use Compatibility Standards, noise levels of up to 60 dB are acceptable for low density single-family residence, up to 65 dB for multi-family residences, and up to 70 dB for commercial land uses. In addition, the State Building Code (Title 24, CCR, Part 2) establishes uniform minimum noise insulation performance standards to protect persons within new hotels, motels, dormitories, long-term care facilities, apartment houses, and residential units other than detached single-family residences from the effects of excessive noise, including, but not limited to, hearing loss or impairment and interference with speech and sleep. Residential structures to be located where the CNEL or day-night average sound level (L_{dn}) is 60 dBA or greater are required to provide sound insulation to limit the interior CNEL to a maximum of 45 dBA. An acoustic, or noise, analysis report prepared by an experienced acoustic engineer is required for the issuance of a building permit for these structures. Land use changes that result in increased noise levels at residences of 60 dBA or greater must be considered in the evaluation of impacts to ambient noise levels.

TABLE 3.5-3
COMMUNITY NOISE EXPOSURE BY LAND USE CATEGORY

Land Use Category	Community Noise Exposure L_{dn} or CNEL, dB						
	Below 55	55–60	60–65	65–70	70–75	75–80	80+
1. Residential – Low Density Single Family, Duplex, Mobile Homes	Normally Acceptable						
		Conditionally Acceptable					
					Normally Unacceptable		
						Clearly Unacceptable	
2. Residential – Multifamily							
3. Transient Lodging – Motels, Hotels							
4. Schools, Libraries, Churches, Hospitals, Nursing Homes							
5. Auditoriums, Concert Halls, Amphitheaters							
6. Sports Arena, Outdoor Spectator Sports							
7. Playgrounds, Neighborhood Parks							
8. Golf Courses, Riding Stables, Water Recreation, Cemeteries							
9. Office Buildings, Business Commercial and Professional							
10. Industrial, Manufacturing, Utilities, Agriculture							

Normally Acceptable: Specified land use is satisfactory, based on the assumption that any buildings involved are of normal conventional construction, without any special noise insulation requirements.

Conditionally Acceptable: New construction or development should be undertaken only after a detailed analysis of the noise reduction requirements is made and noise insulation features needed are included in the design. Conventional construction, but with closed windows and fresh air supply systems or air conditioning will normally suffice.

Normally Unacceptable: New construction or development should generally be discouraged. If new construction or development does proceed, a detailed analysis of the noise reduction requirements must be made with noise insulation features included in the design.

Clearly Unacceptable: New construction or development should generally not be undertaken.

SOURCE: California Governor's Office of Planning and Research. Updated September 1, 2019. General Plan Guidelines: 2017 Update. Appendix D: Noise Element Guidelines. http://opr.ca.gov/docs/OPR_Appendix_D_final.pdf

The California Governor's Office of Planning and Research's General Plan Guidelines establish corrections for the acceptable community noise levels described above to account for seasons, outdoor residual noise level, previous exposure and community attitudes, and pure tone or impulse. For instance, in a noisy urban residential community (near relatively busy roads or industrial areas), 5 dB should be subtracted from the measured CNEL; in a very noisy urban residential community, 10 dB should be subtracted from the measured CNEL. The guidelines are advisory in nature, and local jurisdictions have the responsibility to set specific noise standards based on local conditions.

Local

City of Los Angeles General Plan: Noise Element & Municipal Code

The City's Noise Element provides Policy 3.1, which encourages the development of land use policies and programs in effort to reduce or eliminate potential, and existing, noise impacts.[2] Chapter XI of the Los Angeles Municipal Code (LAMC) provides noise regulations for the City of Los Angeles, as referenced in Section 41.40 of Chapter IV.[3] The construction noise regulations provided by the LAMC:

- No person shall, between the hours of 9:00 p.m. and 7 a.m. of the following day, perform any construction or repair work of any kind [which] entails the use of … equipment which makes loud noises to the disturbance of persons occupying sleeping quarters in any dwelling hotel or apartment or other place of residence.

- The provisions do not apply to construction work done in any district zoned for manufacturing or industrial land uses.

Subsection (c) of Section 41.10 also restricts construction work on Saturdays or any national holiday before 8:00 a.m. or after 6 p.m. No construction work would be conducted on Sundays at all hours. Generally, the City's Department of Building and Safety enforces Noise Ordinance provisions according to equipment, and the Los Angeles Police Department (LAPD) enforces noise provisions generated by the public. The City of Los Angeles Noise Regulations are provided in Chapter XI of the LAMC.[4] Section 111.02 of the LAMC includes procedures and criteria for the measurement of the sound level of "offending" noise sources.

According to the LAMC, a noise source that causes a noise level increase of 5 dBA over the existing average ambient noise level as measured at an adjacent property line creates a noise violation. This section applies to radios; television sets; air-conditioning; refrigeration; heating and pumping; filtering equipment; powered equipment intended for repetitive use in residential areas; and motor vehicles driven on-site. Section 111.03 of the LAMC states that, in cases where the actual ambient conditions are not known, the City's presumed daytime

[2] City of Los Angeles Department of City Planning. Adopted 3 February 1998. Noise Element of the Los Angeles City General Plan. https://planning.lacity.org/odocument/b49a8631-19b2-4477-8c7f-08b48093cddd/Noise_Element.pdf

[3] City of Los Angeles. 2023. Los Angeles Municipal Code, Chapter IV: Public Welfare. https://codelibrary.amlegal.com/codes/los_angeles/latest/lamc/0-0-0-193741

[4] City of Los Angeles. 2023. Los Angeles Municipal Code, Chapter XI: Noise Regulations. https://codelibrary.amlegal.com/codes/los_angeles/latest/lamc/0-0-0-193741

(7:00 a.m. to 10 p.m.) and nighttime (10:00 p.m. to 7:00 a.m.) minimum ambient noise levels should be used. Presumed ambient noise levels for City Los Angeles by zone are provided in **Table 3.5-4, *City of Los Angeles Presumed Ambient Noise Levels***, where the actual ambient conditions are unknown for these areas. For instance, areas zoned for commercial have a presumed ambient noise level of 60 dBA during the daytime and 55 dBA during the nighttime.

TABLE 3.5-4
CITY OF LOS ANGELES PRESUMED AMBIENT NOISE LEVELS

Zone	Daytime Hours (7 a.m. to 10 p.m.) dBA (L_{eq})	Nighttime Hours (10 p.m. to 7 a.m.) dBA (L_{eq})
Residential (A1, A2, RA, RE, RS, RD, RW1, RW2, R1, R2, R3, R4, and R5)	50	40
Commercial (P, PB, CR, C1, C1.5, C2, C4, C5, and CM)	60	55
Manufacturing (M1, MR1, and MR2)	60	55
Heavy Manufacturing (M2 and M3)	65	65

Note: L_{eq} = equivalent continuous sound pressure level.
Source: LAMC Section 111.03.

LAMC Section 112.05 sets a maximum noise level for construction equipment of 75 dBA at a distance of 50 feet when operated within 500 feet of a residential zone. Compliance with this standard shall not apply where compliance therewith is technically infeasible.

Los Angeles Unified School District Subsequent Program EIR

The 2023 SPEIR establishes Standard Conditions (SCs) for reducing impacts on noise and vibration in areas where future projects would be implemented under the SUP, including the proposed Project. The SCs minimize noise and vibration impacts due to both construction and operation of the proposed Project (**Table 3.5-5, *Noise Standard Conditions of Approval***).

TABLE 3.5-5
NOISE STANDARD CONDITIONS OF APPROVAL

Applicable SC	Description
SC-N-1	LAUSD shall design new buildings and other noise-generating sources to include features such as sound walls, building configuration, and other design features that attenuate exterior noise levels on a school campus to less than 67 dBA L_{eq}.[5]
SC-N-2	LAUSD shall analyze the acoustical environment of the site (such as traffic) and the characteristics of planned building components (such as Heating, Ventilation, and Air Conditioning [HVAC]), and designs shall achieve interior classroom noise levels of less than 45 dBA L_{eq} with a target of 40 dBA L_{eq} (unoccupied), and a reverberation time of 0.6 seconds. Noise reduction methods shall include, but are not limited to, sound walls, building and/or classroom insulation, HVAC modifications, double-paned windows, and other design features. • New construction should achieve classroom acoustical quality consistent with the current School Design Guide and CHPS (California High Performance Schools) standard of 45 dBA L_{eq}. • New HVAC installations should be designed to achieve the lowest possible noise level consistent with the current School Design Guide. HVAC systems shall be designed so that noise from the system does not cause the ambient noise in a classroom to exceed the current School Design Guide and CHPS standard of 45 dBA L_{eq} • Modernization of existing facilities and/or HVAC replacement projects should improve the sound performance of the HVAC system over the existing system. • The District's purchase of new units should give preference to HVAC manufacturers that sell the lowest noise level units at the lowest cost. • Existing HVAC units operating in excess of 45 dBA Leq inside classrooms should be modified
SC-N-3	LAUSD shall incorporate long-term permanent noise attenuation measures between new playgrounds, stadiums, and other noise-generating facilities and adjacent noise-sensitive land uses, to reduce noise levels to meet jurisdictional standards or an increase of 3 dB or less over ambient. Operational noise attenuation measures include, but are not limited to: • Buffer zones; • Berms; • Sound barriers; • Buildings; • Masonry walls; • Enclosed bleacher foot wells; and/or Other site-specific project design features
SC-N-4	LAUSD or its Construction Contractor shall consult and coordinate with the school principal or site administrator, and other nearby noise sensitive land uses prior to construction to schedule high noise or vibration producing activities to minimize disruption. Coordination between the school, nearby land uses and the Construction Contractor shall continue on an as-needed basis throughout the construction phase of the project to reduce school and other noise sensitive land use disruptions.
SC-N-5	LAUSD shall require the Construction Contractor to minimize blasting for all demolition and construction activities, where feasible
SC-N-6	For projects where pile driving activities are required within 150 feet of a structure, a detailed vibration assessment shall be provided by an acoustical engineer to analyze potential impacts

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

TABLE 3.5-5
NOISE STANDARD CONDITIONS OF APPROVAL

Applicable SC	Description
	related to vibration to nearby structures and to determine feasible mitigation measures to eliminate potential risk of architectural damage.
SC-N-7	LAUSD shall meet with the Construction Contractor to discuss alternative methods of demolition and construction for activities within 25 feet of a historic building to reduce vibration impacts. During the preconstruction meeting, the Construction Contractor shall identify demolition methods not involving vibration-intensive construction equipment or activities. For example: sawing into sections that can be loaded onto trucks results in lower vibration levels than demolition by hydraulic hammers. • Prior to construction activities, the Construction Contractor shall inspect and report on the current foundation and structural condition of the historic building. • The Construction Contractor shall implement alternative methods identified in the preconstruction meeting during demolition, excavation, and construction, such as mechanical methods using hydraulic crushers or deconstruction techniques. • The Construction Contractor shall avoid use of vibratory rollers and packers adjacent to the building. • During demolition, the Construction Contractor shall not phase any ground-impacting operations near the building to occur at the same time as any ground impacting operation associated with demolition and construction. During demolition and construction, if any vibration levels cause cosmetic or structural damage to the building or structure, a "stop-work" order shall be issued to the Construction Contractor immediately to prevent further damage. Work shall not restart until the building is stabilized and/or preventive measures to relieve further damage to the building are implemented.
SC-N-8	Projects within 500 feet of a non-LAUSD sensitive receptor, such as a residence, shall be reviewed by OEHS to determine what, if any, feasible project specific noise reduction measures are needed. The Construction Contractor shall implement project specific noise reduction measures identified by OEHS. Noise reduction measures may include, but are not limited to, the following: <u>Source Controls</u> • Time Constraints – prohibiting work during sensitive nighttime hours. • Scheduling – performing noisy work during less sensitive time periods (on operating campus: delay the loudest noise generation until class instruction at the nearest classrooms has ended; residential: only between 7:00 AM and 7:00 PM). • Equipment Restrictions – restricting the type of equipment used. • Substitute Methods – using quieter methods and/or equipment. • Exhaust Mufflers – ensuring equipment has quality mufflers installed. • Lubrication & Maintenance – well maintained equipment is quieter. • Reduced Power Operation – use only necessary size and power. • Limit Equipment On-Site – only have necessary equipment on-site. • Noise Compliance Monitoring – technician on site to ensure compliance. • Quieter Backup Alarms – manually-adjustable or ambient sensitive types. <u>Path Controls</u> • Noise Barriers – semi-permanent or portable wooden or concrete barriers. • Noise Curtains – flexible intervening curtain systems hung from supports. • Enclosures – encasing localized and stationary noise sources. • Increased Distance – perform noisy activities farther away from receptors, including operation of portable equipment, storage and maintenance of equipment. <u>Receptor Controls</u> • Window Treatments – reinforcing the building's noise reduction ability.

TABLE 3.5-5
NOISE STANDARD CONDITIONS OF APPROVAL

Applicable SC	Description
	• Community Participation – open dialog to involve affected residents. • Noise Complaint Process – ability to log and respond to noise complaints. Advance notice of the start of construction shall be delivered to all noise sensitive receptors adjacent to the project area. The notice shall state specifically where and when construction activities will occur, and provide contact information for filing noise complaints with the Construction Contractor and the District. In the event of noise complaints noise shall be monitored from the construction activity to ensure that construction noise is not obtrusive.
SC-N-9	Construction Contractor shall ensure that LAUSD interior classroom noise and exterior noise standards are met to the maximum extent feasible, or that construction noise is not disruptive to the school environment, through implementation of noise control measures, as necessary.[6] Noise control measures may include, but are not limited to: <u>Path Controls</u> • Noise Attenuation Barriers[7] – Temporary noise attenuation barriers installed blocking the line of sight between the noise source and the receiver. Intervening barriers already present, such as berms or buildings, may provide sufficient noise attenuation, eliminating the need for installing noise attenuation barriers. <u>Source Controls</u> • Scheduling – performing noisy work during less sensitive time periods (on operating campus: delay the loudest noise generation until class instruction at the nearest classrooms has ended; residential areas: only between 7:00 AM and 7:00 PM). • Substitute Methods – using quieter methods and/or equipment. • Exhaust Mufflers – ensuring equipment has quality mufflers installed. • Lubrication & Maintenance – well maintained equipment is quieter. • Reduced Power Operation – use only necessary size and power. • Limit Equipment On-Site – only have necessary equipment on-site. • Quieter Backup Alarms – manually-adjustable or ambient sensitive types. If OEHS determines that the above noise reduction measures will not reduce construction noise to below the levels permitted by LAUSD's noise standards LAUSD shall mandate that construction bid contracts include the following receptor controls: <u>Receptor Controls</u> • Temporary Window Treatments – temporarily reinforcing the building's noise reduction ability. Temporary Relocation – in extreme otherwise unmitigable cases, students shall be moved to temporary classrooms / facilities away from the construction activity.

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

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

3.5.3 Thresholds of Significance

According to Appendix G of the State CEQA Guidelines, the proposed Project could have a potentially significant impact with respect to noise if it would:

a) Generate a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.

b) Generate excessive groundborne vibration or groundborne noise levels.

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

Criteria (c) was determined to result in no impacts by the Initial Study and, therefore, is not carried forward for analysis in the EIR.

City of Los Angeles Thresholds

Operational Traffic Noise

A project would have a long-term operational noise impact if noise levels from project operations cause the ambient noise levels at the property line of affected uses to increase by 3 dBA CNEL, and noise levels reach, or are within the "normally unacceptable," or "clearly unacceptable" category, or increase by 5 dBA CNEL, or greater.

Operational Stationary Noise

Stationary noise sources are prohibited from causing the ambient noise level to increase by more than 5 dBA L_{eq}.

Construction Noise

Project construction-related activities would result in a significant noise impact at nearby sensitive uses if:

- Construction-related noise levels exceed 75 dBA L_{eq} measured at a distance of 50 feet from equipment when construction activities are located within 500 feet of a residential area unless technically feasible mitigation measures are incorporated;

- Construction activities lasting more than 1 day would exceed existing ambient exterior noise levels by 10 dBA L_{eq}, or more, at a noise sensitive use;

- Construction activities lasting more than 10 days in a 3-month period would exceed existing ambient exterior noise levels by 5 dBA L_{eq}, or more, at a noise sensitive use; or

- Construction activities would exceed the ambient noise level by 5 dBA L_{eq} at a noise sensitive use between the hours of 9:00 p.m. and 7:00 a.m. Monday through Friday, before 8:00 a.m., or after 6:00 p.m., on Saturday, or on a national holiday, or at any time on Sunday.

LAUSD Thresholds

The 2023 SPEIR outlines the following LAUSD noise level thresholds for school sites according to Education Code Section 17215. The Project would result in a significant long-term noise impact if:

- Eterior noise levels exceed 67 dBA L_{eq};
- Interior classroom noise levels exceed 45 dBA L_{eq}; or
- Noise levels at nearby noise-sensitive land uses are permanently increased by 3 dBA CNEL

3.5.4 Methodology

Construction Noise

Predicted noise levels were identified for the nearest sensitive receptors, as well as for classrooms on Campus, based on their respective distances from the construction equipment. To present a conservative impact analysis, the estimated noise levels were calculated for a scenario in which the loudest equipment was assumed to be located in the construction area, and the distance to the nearest sensitive receptor was calculated. The loudest construction equipment would not always be located at the nearest distance to sensitive receptors, but would typically be active throughout the Project site, and would routinely be located further away from the affected sensitive receptors. The construction noise levels were calculated, in terms of maximum hourly L_{eq}, for sensitive receptor locations based on the standard point source noise-distance attenuation factor of 6.0 dBA for each doubling of distance. The estimated noise levels at the affected receptors were then analyzed against the construction noise standards.

Groundborne Vibration

Groundborne vibration levels resulting from construction activities at the Project site were estimated using data in the FTA Transit Noise and Vibration Impact Assessment guidance document. Potential vibration levels resulting from construction of the Project are identified for offsite locations that are sensitive to vibration (i.e., existing residential buildings) based on their distance from construction activities, as well as classrooms on Campus.

Operational Noise

During operation of the Project, noise levels would be generated onsite by stationary noise sources, such as generators and air conditioning units, and student activities, which would be similar to the existing conditions. The noise levels generated by the stationary noise sources are not assessed because proposed equipment would replace existing equipment that is potentially louder and less efficient. Additionally, the locations and

specifications of equipment would not be available at this stage of the proposed Project. Instead, a qualitative assessment is used and the applicable SCs from the 2023 SPEIR are incorporated.

3.5.5 Impact Analysis

Impact 3.5-1: The Project would not result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or in other applicable local, state, or federal standards.

The proposed Project would result in potentially significant impacts in relation to 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. To evaluate potential impacts, noise measurements were conducted at four locations within 50 feet of the Project site to characterize ambient noise conditions (Figure 3.5-2). Based on the anticipated construction equipment and operational activities, the proposed Project noise level is not expected to exceed applicable noise significance thresholds.

Sensitive Receptors

Land uses considered noise sensitive by the City of Los Angeles CEQA Thresholds Guide include residences, schools, libraries, churches, playgrounds, hospitals, nursing homes, and neighborhood parks. The nearest sensitive receptors are located directly adjacent to the western border of the proposed Project site, where there are three residential parcels along West Avenue 52 (Figure 3.5-1). In addition to single- and multi-family residences within vicinity of the proposed Project site, Fletcher Drive Elementary School is located to the northeast of Irving MS, across Estara Avenue.

Construction

Noise impacts from construction of the proposed Project would be a function of the noise generated by construction equipment, the location of the equipment, the timing and duration of the noise-generating construction activities, and the relative distance to noise sensitive receptors. Proposed replacement and reconfiguration efforts would include the demolition of 62,442 square feet, consisting of six portable buildings and three permanent buildings. Site preparation assumes landscaping activities, including tree removal and unwanted debris, and proposed improvements to the areas located directly above the fault, which would be converted into outdoor open space or parking area. Grading activities would be conducted in preparation for building construction and parking area improvement; followed by the construction of a two-story building (56,000 square feet) to provide 19 standard classrooms and administration facilities. New structures would require architectural coating of internal and external walls, and paving activities would be completed surrounding the new buildings and at the parking area. Each phase of construction would involve the use of various types of construction equipment and would have distinct noise characteristics with varying intensity.

The proposed Project would require the use of heavy equipment for site preparation and grading of the Project site during the initial phases of the anticipated 42-month construction phase. Individual pieces of construction equipment that would be used during construction of the proposed Project could potentially generate

maximum noise levels ranging from 79 to 85 dBA at the Federal Highway Administration's reference distance of 50 feet from the noise source (**Table 3.5-6, *Noise Levels for Typical Construction Equipment***). While these maximum noise levels would occur when equipment is operating under full power conditions (i.e., with the equipment engine at maximum speed), construction equipment often operates under less than full power on site. The transport of workers and materials to and from the construction site would incrementally increase noise levels along local roadways. Individual construction vehicle pass-by trips may create momentary noise levels of up to approximately 85 dBA (maximum sound level, or L_{max}) at 50 feet from the vehicle, but these occurrences would generally be short-lived, and during daytime hours.

TABLE 3.5-6
NOISE LEVELS FOR TYPICAL CONSTRUCTION EQUIPMENT

Equipment	Estimated Usage Factor* (%)	Typical Noise Level at 50 feet from Source (dBA)
Air Compressors	5	80
Cement and mortar mixer	50	80
Dozer	20	82
Excavator	40	85
Grader	40	85
Roller	20	80
Rubber tired loader	40	79
Tractor / loader / backhoe	40	80

Note: * Usage factor represents the percentage of time the equipment would be operating at full speed.

Source: U.S Environmental Protection Agency. 1974. Background Document for Interstate Motor Carrier Noise Emission Regulations.

Federal Highway Administration. 2006. FHWA Roadway Construction Noise Model User's Guide. Prepared by U.S. Department of Transportation, Research and Innovative Technology Administration, John A. Volpe National Transportation Systems Center Acoustics Facility.

The U.S. Environmental Protection Agency (EPA) has established the noise levels for the heavy equipment that will be used during construction to range from 65 to 85 dBA within 50 feet. To characterize construction-phase noise levels more accurately, the average noise level associated with each phase of construction was calculated based on the quantity, type, and usage factors for each type of equipment, assuming that the equipment would be utilized simultaneously. Noise modelling and calculations were conducted to estimate potential noise impacts to sensitive receptors during construction activities (Appendix 7).

Demolition is expected to generate the most noise during construction activities, as an excavator would be used, which can reach 85 dBA at 50 feet from the equipment (Table 16). Although the nearest sensitive receptors are located directly adjacent to the proposed Project site boundary, the demolition zones include the Administration Building in the center Campus, Classroom 1, and the Homemaking Building. The closest distance between the nearest sensitive receptors and an area that would require excavation is approximately 75 feet between the Homemaking Building and the single-family residences located on Marguerite Street. When distance is the only factor considered, sound levels from an isolated noise source will typically decrease by about 6 dBA for every doubling of distance away from the noise source. When the noise source is essentially continuous (e.g., vehicle traffic on a highway), noise levels decrease by about 3 dBA for every doubling of distance. In order to determine the sound pressure at 218 feet from the excavators, the sound attenuation formula was used, which assumes

that for each doubling of distance from a point source, the sound pressure level decreases by approximately 6 dBA. The formula to calculate sound attenuation over distance for a point source is:

$$L_2 = L_1 - 20log_{10}(\frac{R_2}{R_1})$$

where

L_1 = Known sound pressure level at one location

L_2 = Unknown sound pressure level at a second location

R_1 = Distance from the point source to the first location of known sound pressure level

R_2 = Distance from the point source to the second location

Using this formula, the excavators would have a sound pressure level of 81.5 dBA at 218 feet from the source of the equipment. Noise impacts are considered potentially significant when construction noise levels exceed ambient noise levels by 5 dBA, or more (see Table 3.5-1). Pursuant to Education Code Section 17215 and the 2023 SPEIR, the exterior noise significance threshold for school sites is 67 dBA. As shown in Table 3.5-7, estimated construction noise levels would potentially exceed the applicable significance thresholds. Therefore, the impact would be considered potentially significant before implementation of 2023 SPEIR SCs.

The proposed Project requires compliance with the 2023 SPEIR SCs, as shown in Table 3.5-5. SC-N-8 and SC-N-9 requires site-specific noise control measures to be implemented during construction. Such measures include installation of exhaust mufflers, proper maintenance of construction equipment, and the use of noise barriers. Absorptive noise mufflers are commercially available and can feasibly reduce noise emitted by heavy-duty construction equipment. Mufflers can achieve noise reductions of up to 3 dBA, and installation of a temporary 15-foot-high noise barrier with acoustical blankets with a minimum sound transmission class (STC) of 25 and noise reduction coefficient (NRC) of 0.75 can reduce noise levels by up to 20 dBA. Therefore, it is estimated that implementation of the 2023 SPEIR SCs would reduce Project-related construction noise by a total of 23 dBA. Therefore, consistent with City of Los Angeles thresholds, with implementation of the 2023 SPEIR SCs, the proposed Project would not result in construction-related noise levels exceeding 75 dBA measured at 50 feet from equipment and would not exceed existing ambient exterior noise levels by 5 dBA. Consistent with LAUSD thresholds, with implementation of 2023 SPEIR SCs, the proposed Project would not increase long-term exterior noise levels above 67 dBA; would not exceed interior classroom noise levels by 45 dBA; and would not permanently increase noise levels at nearby sensitive receptors by 3 dBA CNEL.

Traffic noise levels and vehicle trips generated from the proposed construction activities would not substantially increase existing traffic noise levels. The proposed Project would also comply with all applicable construction standards and requirements including limiting construction and maintenance activities to 7:00 a.m. to 7:00 p.m. on weekdays and Saturdays and prohibiting work on federal holidays and Sundays. Heavy construction equipment would not be operated outside of this time frame and would limit the delivery of materials and equipment between these hours.

Operation

Operation and maintenance activities would be comparable to existing activities and would utilize two M&O portable buildings for activities such as irrigation to maintain the landscaping areas. The proposed Project activities would comply with the City's Noise Ordinance. The proposed Project would reduce the number of classrooms and parking spaces and would not introduce any new sources of noise in comparison to the existing noise sources. Traffic and noise from vehicle trips related to operations and maintenance of the facility would reduce as student enrollment at the Campus decreases. The development of the proposed Project would not result in an increase in traffic noise surrounding the Project site since student capacity would not increase VMT, resulting in increased noise levels. Implementation of SC-N-8 would require all feasible measures to reduce construction noise below the standard through source controls, such as scheduling, equipment restrictions, mufflers, reduced power, noise compliance monitoring; and path controls, such as temporary noise barriers, noise curtains, enclosures); and receptor controls, including community participation, noise complaint response, and communications.

Significance Determination

Less than significant impact.

Mitigation Measures

No mitigation measures are required.

Impact 3.5-2: The Project would not result in generation of excessive groundborne vibration or groundborne noise levels.

The proposed Project would result in less than significant impacts to noise in relation to generation of excessive ground-borne vibration or ground-borne noise. Existing ground-borne vibration in the Project site is limited to minor traffic-induced vibrations from nearby streets, highways, and freeway vehicular traffic. At the time of the characterization of the baseline conditions in August 2023, there were no construction projects, oil fields, mining operations, blasting, or other activities resulting in ground-borne vibrations within the Project site or vicinity.

A typical vibration level from trucks, which will be used during construction, is 0.076 peak particle velocity (PPV) at 25 feet (inches per second, or in/sec). Equipment such as pile drivers, which produce higher vibration levels, would not be used during the construction. Vibration levels reduce quickly with distance away from the source, so vibration would decay below the 0.05 inch per second root mean square vertical velocity threshold at the residential housing located immediately adjacent to the Project. Construction of the proposed Project would not require blasting or other activities that would result in excessive ground-borne vibrations; and construction equipment would not produce substantial vibration impacts.

U.S. Department of Transportation, Federal Transit Administration (FTA) guidelines were utilized in determining vibration impacts. The FTA measures building vibration damage in PPV, which is measured in inches per second (Table 3.5-2). The FTA guidelines provide vibration criterion which indicates the significant impact level; the criterion of 0.2 inch per second for nonengineered timber and masonry buildings will be used for the purpose of this analysis.

Construction

Construction of the proposed Project would generate ground-borne vibration during grading and earth-moving activities. The FTA has published standard vibration velocities for various construction equipment operations. The typical vibration levels (in terms of inches per second PPV) at a reference distance of 25 feet, 50 feet, and 100 feet for construction equipment used during construction activities are listed in **Table 3.5-7, *Vibration Source Levels for Construction Equipment***.

TABLE 3.5-7
VIBRATION SOURCE LEVELS FOR CONSTRUCTION EQUIPMENT

Equipment	PPV at 25 feet (in/sec)	PPV at 50 feet (in/sec)	PPV at 100 feet (in/sec)
Vibratory roller	0.210	0.074	0.026
Large bulldozer	0.089	0.031	0.011
Loaded trucks (haul truck)	0.076	0.027	0.010
Small bulldozer	0.003	0.001	0.000

Note: *Assumed to be comparable to pile driving methods.

Source: Federal Transit Administration. 2006. Transit Noise and Vibration Impact Assessment.

Construction of the proposed Project would not include any pile-driving methods; impacts from these activities are not included in this construction vibration analysis. Vibration velocities from heavy construction operations that would be used during construction would range from 0.000 to 0.026 in/sec PPV at a reference distance of 100 feet from the equipment (**Table 3.5-8, *Human Response to Transient Vibration***). The nearest sensitive receptors (residences on Marguerite Street) would be approximately 75 feet from the construction equipment that would produce the highest vibration levels due to demolition. These levels are well below the potential damage threshold of 0.2 in/sec. Ground-borne vibration from construction rarely results in a negative response from people who are outdoors. Negative responses are typically associated with the shaking of the building where the person is located. Since construction vibration is transient, the Caltrans guidance manual can be used to categorize the potential human response to construction-induced vibration.

TABLE 3.5-8
HUMAN RESPONSE TO TRANSIENT VIBRATION

Average Human Response	PPV (in/sec)
Severe	2.000
Strongly perceptible	0.900
Distinctly perceptible	0.240
Barely perceptible	0.035

Source: California Department of Transportation. April 2020. Transportation and Construction Vibration Guidance Manual. https://dot.ca.gov/-/media/dot-media/programs/environmental-analysis/documents/env/tcvgm-apr2020-a11y.pdf

The nearest sensitive receptor to the proposed demolition activities would be the single-family residences that are located approximately 75 feet east of the demolition activities at the Homemaking Building.

(1) $PPV_{equip} = PPV_{ref} \times (25/D)^{1.5}$

where

PPV_{equip} is the peak particle velocity in in/sec of the equipment adjusted for distance

PPV_{ref} is the reference vibration level in in/sec at 25 feet

D is the distance from the equipment to the receiver

Solving for Equation (1) provides a maximum vibration level of less than 0.005 PPV at the closest sensitive receptor, which is considered barely perceptible according to the Caltrans guidance manual.

Operation

There would be no impact during operations, as operation of the proposed Project would not include the use of any ground-borne vibration producing equipment. Vibration levels from operations and maintenance activities would include minor irrigation efforts to maintain the landscaping areas. The proposed Project would provide two on-Campus M&O buildings, and day-to-day operation and maintenance activities would not change as a result of the Project. All construction and operation activities would be undertaken in accordance with all federal, state, county, and City building codes. Noise impacts to the generation of excessive ground-borne vibration or ground-borne noise during construction and operation would be less than significant. No further analysis is warranted.

Significance Determination

Less than significant impact.

Mitigation Measures

No mitigation measures are required.

3.5.6 Cumulative Impacts

As an active school campus, Irving MS is anticipated to have ongoing maintenance activities that would occur throughout the Campus. However, subsequent projects on the Campus would not have the same scope, or scale, associated with this Project and would generate little or no construction noise. In addition, the District has more than 22 comprehensive modernization, upgrade, or new development projects planned for campuses located within the District's boundaries but none of these would occur within one mile of the Campus. No other construction activities would occur on the Campus, other than activities described and analyzed herein, that would contribute to a cumulative construction noise environment. There are no ongoing or reasonably foreseeable projects located within 500 feet of the Project site. Therefore, the cumulative construction and operational noise and vibration impacts would be less than significant.

3.5.7 References

California Department of Transportation. April 2020. Transportation and Construction Vibration Guidance Manual. https://dot.ca.gov/-/media/dot-media/programs/environmental-analysis/documents/env/tcvgm-apr2020-a11y.pdf

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City of Los Angeles. 2023. Los Angeles Municipal Code, Chapter IV: Public Welfare. https://codelibrary.amlegal.com/codes/los_angeles/latest/lamc/0-0-0-193741

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City of Los Angeles Department of City Planning. Adopted 3 February 1998. Noise Element of the Los Angeles City General Plan. https://planning.lacity.org/odocument/b49a8631-19b2-4477-8c7f-08b48093cddd/Noise_Element.pdf

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

U.S Environmental Protection Agency. 1974. Background Document for Interstate Motor Carrier Noise Emission Regulations.

3.6 Pedestrian Safety

This section provides an assessment of potential impacts related to pedestrian safety that could result from implementation of the Project. Potential impacts addressed in this section are associated with substantial increases in vehicular and/or pedestrian hazards due to design features or incompatible uses; creation of unsafe routes to schools for students walking from local neighborhoods, and site location that is adjacent to or near a major arterial roadway or freeway that may pose a safety hazard.

The analysis in this section is primarily based on the Linscott, Law, & Greenspan, Engineers (LLG) *Pedestrian and Safety Study for Washington Irving Middle School Major Modernization Project* findings, which is included as Appendix 8 of this EIR. Scoping comments from the California Department of Transportation (Caltrans) were received (Appendix 3 of the EIR) regarding pedestrian safety due to increases in traffic, potential road closures, student drop-off/pick-up traffic, and circulation on the streets surrounding the Campus, West Avenue 32, Estara Avenue, Fletcher Drive, and Marguerite Street. These comments are addressed in this section with recommendations for implementation during construction phases of the Project.

3.6.1 Environmental Setting

LLG conducted field observation site visits to Irving MS on October 5, 2023, for the traffic and pedestrian safety assessment. The *Pedestrian and Safety Study* (Appendix 8) is used for context in the analysis of this section. Pedestrian access for the Project site is provided by seven existing pedestrian gates (see Figure 2-3, *Existing Site Plan and Context Photos*):

1) **Main Gate:** along the west side of Estara Avenue at the Irving MS main entrance, between the existing Administration Building and the existing Auditorium building

2) **Visitor Entrance:** along the west side of Estara Avenue and adjacent to the former Roswell Street that provides vehicular access to the school

3) One unnamed pedestrian gate along the north side of Marguerite Street, between the existing Auditorium and Homemaking Buildings

4) **Octavia Gate 1:** along the north side of Marguerite Street serving Isana Octavia Academy, between the new classroom building and the racquetball courts

5) **Magnet Gate:** along the east side of West Avenue 32 serving various instructional programs, near the soccer field

6) **Octavia Gate 3:** along the south side of Fletcher Drive serving the City of Angels Community School

7) **Fletcher Gate:** along the south side of Fletcher Drive at the former Moss Avenue and adjacent to the Vehicular Access 2 driveway

The Project site is bounded by Fletcher Drive (a two-lane Avenue II roadway) to the northwest, Estara Avenue (a two-lane local street) to the northeast, Marguerite Street (a two-lane local street) and State Route (SR)-2 (elevated freeway with no exit point until San Fernando Road approximately 0.2 mile southwest of the Project

site) to the southeast, and West Avenue 32 (a two-lane local street) to the southwest. The existing Campus contains three main instructional programs: Irving MS, City of Angeles Community School, and Isana Octavia Academy. Existing public sidewalks and pedestrian facilities are provided along the Campus edges. Americans with Disabilities Act (ADA) access ramps are also provided entering the Campus and at intersections surrounding the Campus, with the exception of the Vehicular Access 1 driveway. The *Pedestrian and Safety Study* (Appendix 8) recommends that the Vehicular Access 1 driveway be improved with an ADA-accessible sidewalk entry or curb ramps. Students, faculty, and staff can currently travel to school using public transit routes, bicycles, and by walking. In addition to the seven (7) pedestrian access points, there are five (5) pick-up/drop-of entry points. The nearest transit stations are bus stops at Fletcher Drive/West Avenue 32 (0.3 mile southwest)[1] and Fletcher Drive/Estara Avenue (0.1 mile northwest).[2] A public sidewalk approximately four feet in width (excluding landscaping) is provided on West Avenue 32 along the edge of the Irving MS Campus, and there is some erosion along the western and southern areas of the Campus that affected the sidewalk along West Avenue 32.

ADA compliant access ramps are provided at six locations (Appendix 8):

1) West Avenue 32 (South Leg) / Fletcher Drive
2) West Avenue 32 (North Leg) / Fletcher Drive
3) Vehicular Access 2 Driveway (formerly Moss Avenue) / Fletcher Drive
4) Estara Avenue / Fletcher Drive
5) Estara Avenue / Marguerite Street
6) West Avenue 33 / Marguerite Street

Traditional yellow continental style pedestrian crossings exist at five locations:

1) West Avenue 32 (South Leg) / Fletcher Drive
2) West Avenue 32 (North Leg) / Fletcher Drive
3) Estara Avenue / Fletcher Drive

[1] Moveit. N.d. Directions from Fletcher/Ave 32 Station to Irving Steam Magnet Middle School. https://moovitapp.com/los_angeles_ca-302/poi/3087%20West%20Avenue%2032/Irving%20Middle%20School%20%28Irving%20Steam%20Magnet%29/en?metroSeoName=Los_Angeles_CA&customerId=4908&ref=1&af_sub8=%2Findex%2Fen%2Fpublic_transit-Downtown_Los_Angeles-Los_Angeles_CA-site_25758890-302&af_sub9=Search%20bar%20button&fll=34.11756_-118.24152&poiType=egsite&ttl=34.116484_-118.243459 (accessed August 25, 2023).

[2] Moveit. N.d. Directions from Fletcher/Estara Bus Station to Irving Steam Magnet Middle School. Accessed August 25, 2023. https://moovitapp.com/los_angeles_ca-302/poi/Irving%20Middle%20School%20%28Irving%20Steam%20Magnet%29/Fletcher%20~2F%20Estara/en?metroSeoName=Los_Angeles_CA&customerId=4908&ref=1&af_sub8=%2Findex%2Fen%2Fpublic_transit-Fletcher_Estara-Los_Angeles_CA-stop_46202082-302&af_sub9=Search%20bar%20button&fll=34.11799_-118.24153&ttl=34.11756_-118.24152&poiType=stop&tsid=46202082,46202082 (accessed August 25, 2023).

4) Estara Avenue / Marguerite Street

5) West Avenue 33 / Marguerite Street

At the western leg of the West Avenue 32 (South Leg) / Fletcher Drive intersection, pedestrian push buttons and rectangular rapid flashing beacons (RRFBs) are in use. The Estara Avenue/Fletcher Drive intersection also uses pedestrian crossing signals and push buttons.

Adjacent to the Project site, Fletcher Drive is part of the City of Los Angeles' 470-mile High Injury Network (HIN), with the portion of the roadway southwest of San Fernando Road (approximately 0.2 mile southwest of Project site) to Riverside Drive included as one of LADOT's 63 Vision Zero street projects: Fletcher Drive Safety Improvements Project.[3]

3.6.2 Regulatory Setting

State

There are no state regulatory transportation plans or programs that are applicable to potential impacts of the proposed Project's temporary construction-period activities. As described below in Section 3.6.5, because the proposed Project would not increase capacity for enrollment or staff at the school, there would be no permanent increase in traffic generated by the Project and no permanent (ongoing) pedestrian safety effects caused by the Project (i.e., after construction is complete).

Regional

There are no regional regulatory transportation plans or programs that are applicable to potential impacts of the proposed Project's temporary construction-period activities.

Local

Vision Zero Initiative

Former Mayor Eric Garcetti issued Executive Directive No. 10 in August 2015, formally launching the Vision Zero initiative in Los Angeles. Vision Zero is also a stated safety objective in the Mobility Plan 2035, which sets the goal of zero traffic deaths by 2035. Vision Zero is a policy which prioritizes the safety of pedestrians and bicyclists on public streets, with the understanding that roads which are safe for vulnerable users would be safer for all users, in an effort to eliminate traffic fatalities. Key elements of the policy, such as reducing traffic speeds, are founded on the principles of engineering, education, enforcement, evaluation, and equity (Appendix 8).

[3] Los Angeles Department of Transportation (LADOT). N.d. VISION ZERO: Fletcher Drive Safety Improvements. https://ladotlivablestreets.org/projects/fletcher (accessed January 24, 2024).

LAUSD School Design Guide. The 2023 LAUSD School Design Guide includes guidelines for vehicular access, parking, and pedestrian safety.[4] The Guide states student drop-off and pick-up, bus loading areas, and parking areas shall be separated to allow students to enter and exit the school grounds safely.

LAUSD shall implement the applicable sidewalk requirements outlined in the School Design Guide. LAUSD shall also coordinate with the responsible traffic jurisdiction/agency to implement infrastructure improvements prior to the opening of a school. Improvements shall include, but are not limited to:

- Clearly designate passenger loading areas with the use of signage, painted curbs, etc.
- Install new walkway and/or sidewalk segments where none exist.
- Substandard walkway/sidewalk segments shall be improved to a minimum of eight feet wide.
- Provide other alternative measures that separate foot traffic from vehicular traffic, such as distinct travel pathways or barricades.

OEHS Traffic and Pedestrian Safety Program

LAUSD has developed performance guidelines to minimize potential pedestrian safety risks to students, faculty and staff, and visitors at LAUSD schools. The performance guidelines include the requirements for: student drop-off areas, vehicle access, and pedestrian routes to school. School traffic/circulation studies shall identify measures to ensure separation between pedestrians and vehicles along potential pedestrian routes, such as sidewalks, crosswalks, bike paths, crossing guards, pedestrian, and traffic signals, stop signs, warning signs, and other pedestrian access measures.

Safe Routes to School (SR2S) Program

This pedestrian safety evaluation includes a determination of whether adequate walkways and sidewalks are provided along the perimeter of, across from, and adjacent to a proposed school site and along the paths of identified pedestrian routes within a 0.25-mile radius of a proposed school site. The purpose of this review is to ensure that pedestrians are adequately separated from vehicular traffic.

3.6.3 Thresholds of Significance

For the purposes of this EIR, LAUSD has used the checklist questions in Appendix G of the CEQA Guidelines as the significance criteria, along with applicable thresholds of significance established by the local jurisdiction (City of Los Angeles), to determine whether the Project would have a significant environmental impact regarding Pedestrian Safety. Based on the size and scope of the Project and the potential for impacts, the criteria identified below are included for evaluation in this EIR.

[4] Los Angeles Unified School District, Design Standards Department. August 2023. School Design Guide: Los Angeles Unified School District.

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

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

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

3.6.4 Methodology

It is anticipated that Campus operations would be more efficient or would be otherwise improved following implementation of the proposed Project, which would result in new and upgraded facilities, and would not result in substantive changes to the existing operation of the school. Project implementation would not provide for an increase in the number of students attending the school or staff required to operate the school. As such, operational activities associated with the proposed Project are not additive to those operations analyzed in the 2023 SPEIR and would not result in substantial changes that have not previously been identified in the 2023 SPEIR. Specifically related to the traffic analysis presented herein, there would be no permanent increase in traffic generated by the school. Therefore, this analysis primarily focuses on potential impacts associated with temporary increases in traffic associated with Project construction activity.

This analysis assesses existing pedestrian safety conditions and potential risks to pedestrian safety from the Project construction or operation. The analysis in this section is primarily based on the *Pedestrian and Safety Study*, (Appendix 8). LLG conducted field observation site visits to Irving MS on October 5, 2023, for the traffic and pedestrian safety assessment.

Standard Conditions

Projects implemented under the 2023 SPEIR are anticipated to have less-than-significant impacts related to pedestrian safety within the LAUSD service area with the incorporation of Standard Conditions (SCs). Applicable SCs related to Project-specific impacts to pedestrian safety are provided in **Table 3.6-1, *Pedestrian Safety Standard Conditions of Approval***.

TABLE 3.6-1
PEDESTRIAN SAFETY STANDARD CONDITIONS OF APPROVAL

Applicable SCs	Description
SC-PED-1	LAUSD shall participate in the Safe Routes to School (SR2S) program. **Caltrans SR2S program.** LAUSD is a participant in the SR2S program administered by Caltrans, local law enforcement, and transportation agencies. OEHS provides pedestrian safety evaluations as a component of traffic studies conducted for new school projects. This pedestrian safety evaluation includes a determination of whether adequate walkways and sidewalks are provided along the perimeter of, across from, and adjacent to a proposed school site and along the paths of identified pedestrian routes within a 0.25-mile radius of a proposed school site. The purpose of this review is to ensure that pedestrians are adequately separated from vehicular traffic.
SC-PED-2	LAUSD shall implement the applicable requirements and recommendations associated with the OEHS Traffic and Pedestrian Safety Program. **OEHS Traffic and Pedestrian Safety Program** LAUSD has developed these performance guidelines to minimize potential pedestrian safety risks to students, faculty and staff, and visitors at LAUSD schools. The performance guidelines include the requirements for: student drop-off areas, vehicle access, and pedestrian routes to school. School traffic/circulation studies shall identify measures to ensure separation between pedestrians and vehicles along potential pedestrian routes, such as sidewalks, crosswalks, bike paths, crossing guards, pedestrian and traffic signals, stop signs, warning signs, and other pedestrian access measures.
SC-PED-3	LAUSD shall implement the applicable sidewalk requirements outlined in the School Design Guide. LAUSD shall also coordinate with the responsible traffic jurisdiction/agency to implement infrastructure improvements prior to the opening of a school. Improvements shall include, but are not limited to: • Clearly designate passenger loading areas with the use of signage, painted curbs, etc. • Install new walkway and/or sidewalk segments where none exist. • Substandard walkway/sidewalk segments shall be improved to a minimum of eight feet wide. Provide other alternative measures that separate foot traffic from vehicular traffic, such as distinct travel pathways or barricades.
SC-PED-4	LAUSD shall design the project to comply with the traffic and pedestrian guidelines in the School Traffic Safety Reference Guide. **School Traffic Safety Reference Guide REF- 4492.2.** This Reference Guide replaces Reference Guide 4492.0, School Traffic Safety, October 26, 2020. Updated information is provided, including new guidance on passenger loading zones and the Safety Valet Program. This guide sets forth requirements for traffic and pedestrian safety, and procedures for school principals to request assistance from OEHS, the Los Angeles Schools Police Department (LASPD), or the local police department regarding traffic and pedestrian safety. Distribution and posting of the Back to School Safety Tips flyer is required. This guide also includes procedures for traffic surveys, parking restrictions, crosswalks, advance warning signs (school zone), school parking signage, traffic controls, crossing guards, or for determinations on whether vehicle enforcement is required to ensure the safety of students and staff.
SC-PED-5	LAUSD shall design new student drop-off, pick-up, bus loading areas, and parking areas to comply with the School Design Guide. **School Design Guide.** The Guide states student drop-off and pick-up, bus loading areas, and parking areas shall be separated to allow students to enter and exit the school grounds safely.

TABLE 3.6-1
PEDESTRIAN SAFETY STANDARD CONDITIONS OF APPROVAL

Applicable SCs	Description
SC-T-3	Implementation of SC-T-3.
SC-T-4	Implementation of SC-T-4.

3.6.5 Impact Analysis

Impact 3.6-1: The Project would not substantially increase vehicular and/or pedestrian safety hazards due to a design feature or incompatible uses.

Construction

The proposed Project would result in less than significant impact with implementation of the Pedestrian and Safety Study recommendations. There is a possibility that streets on or adjacent to the Campus would potentially need to be repaved and restriped as part of the Project, meaning for a brief time during construction phasing, their use would be impacted. Additionally, there is a possibility of construction activity-based traffic that may pose risks to pedestrian safety and access to the Irving MS Campus. The *Pedestrian and Safety Study* confirmed the continued use of multiple loading areas on Campus and sidewalks on Fletcher Drive, Estara Avenue, Marguerite Street, and West Avenue, during construction activity. The study also found that there would be continued use of continental style crosswalks at Estara Avenue/Fletcher Drive, Estara Avenue/Marguerite Street, West Avue 32 (South Leg)/Fletcher Drive, and West Avenue 32 (North Leg)/Fletcher Drive. Demolition of the Administration building and construction of the new Administration and Classroom building may impact the use of the existing Irving MS Main Entrance pedestrian gate on Estara Avenue. If the Main Entrance Gate needs to be closed, pedestrian gate access may be consolidated to other pedestrian gates such as the Visitor Entrance gate on Estara Avenue just south of Roswell Street or the pedestrian gate on Marguerite Street.

Compliance with SC-PED-1 through SC-PED-5 would ensure that potential pedestrian safety impacts during construction would be less than significant. As the Project would maintain pedestrian access and implement SC-T-4 requirements for contractors to submit a Construction Worksite Traffic Control Plan (including strategies to safely accommodate students walking from local neighborhoods) prior to construction, safety conditions for students would be maintained or improved during construction activities. Construction would include a traffic control plan, maintenance of existing sidewalks, access points, and crosswalks. Additional recommendations are contained in the *Pedestrian and Safety Study* to reduce construction related pedestrian safety hazards, but are not required as part of the Project.

The Project site would still function as a school, and the school would remain operational throughout construction activity. This Project plans to decrease the classroom count by 29 percent (or 19 classrooms), for a total of 46 classrooms. The proposed Project would not interfere with public right-of-way, except for construction vehicle entry and exiting from the site and traffic from construction activities.

Operation

The Project would be bounded within the proposed site, and there are no plans for a design feature that would significantly decrease vehicular and/or pedestrian safety. The proposed Project plans to improve portions of parking lots and playgrounds located on the Project site. Any areas located directly above the fault would be turned into outdoor areas, such as hardscape, landscape, or parking. The proposed Project would also provide for ADA upgrades at locations impacted by the Project scope. During operation, there would be no impact regarding the substantially increasing vehicular and/or pedestrian safety hazards due to incompatible uses. Additional recommendations are contained in the *Pedestrian and Safety Study* to further improve operations related pedestrian safety hazards, but are not required as part of the Project.

Significance Determination

Less than significant.

Mitigation Measures

No mitigation measures are required.

Impact 3.6-2: The Project would not create unsafe routes to schools for students walking from local neighborhoods.

Construction

The proposed Project would be implemented at the existing Campus and would not directly or indirectly eliminate sidewalks, crosswalks, or traffic control devices at intersections. With the possible exception of Octavia Gate 3, all existing pedestrian access points to the Campus (currently found at seven locations) are expected to be maintained, depending upon the construction phasing activities. In addition to these entry points are the five main pick-up/drop-off locations, and one Special Education (SPED) bus pick-up/drop-off location. The Project would not change the existing use of the site, increase the student enrollment capacity of the School, or alter the existing sidewalks surrounding the Project site. The proposed Project is limited to modernizing the Campus itself, including repaving ground surfaces to facilitate ADA access and demolishing and replacing other buildings on Campus. Existing vehicle loading areas, sidewalks, and crosswalks are expected to be maintained during construction activities. Existing Irving MS Main Entrance pedestrian gate on Estara Avenue may need to be closed and pedestrian gate access be consolidated to other pedestrian gates, such as the Visitor Entrance gate on Estara Avenue just south of the former Roswell Street or the pedestrian gate on Marguerite Street if pedestrian access is disrupted by construction. The presence of additional vehicles, trucks, and equipment may disrupt pedestrian access during construction phasing. As the Project would maintain pedestrian access and implement SC-T-4 requirements for contractors to submit a Construction Worksite Traffic Control Plan (including strategies to safely accommodate students walking from local neighborhoods) prior to construction, safety conditions for students would be maintained or improved during construction activities. Construction would include a traffic control plan, maintenance of existing sidewalks, access points, and crosswalks.

Additionally, Caltrans recommends working with the Caltrans Office of Permits, Multi-Modal Unit, for a designated truck route for construction trucks to transport construction equipment to and from the construction sites. Construction vehicles and equipment should use alternative routes to avoid congested state facilities, especially during peak hours. Finally, construction trucks may be covered with tarpaulin to avoid debris spillage onto State facilities.[5]

Operation

There would be no impact in regard to the creation of unsafe routes to schools for students walking from local neighborhoods. The proposed Project would alter the configuration of the Campus and not affect surrounding routes for schools. Additional recommendations are contained in the *Pedestrian and Safety Study* to further improve safe routes to school, but are not required as part of the Project.

Comments provided by the Pedestrian and Safety Study recommended that student pick-up/drop-off operations be included as a part of school policies for parents and guardians at the start of each new school year. This policy would include all general traffic procedures, drop-off/pick-up procedures, traffic circulation and parking policy reminders, and policies for local residents. The Pedestrian and Safety study recommends reinforcement of communication of these policies throughout the year in the School's newsletter and to local residents living within a 500-foot radius of the school. School official contact information should be provided in newsletters and on the school website so that the community can comment and ask questions about parking, traffic, and access issues to an official specified traffic and parking ombudsman. It is also recommended that Irving MS prepare a circulation and pedestrian routes plan to inform parents and guardians that students must cross within designated crosswalks, so that they do not block traffic. The OEHS Traffic and Pedestrian Safety Program includes measures that must be followed to ensure separation between pedestrians and vehicles along sidewalks and crosswalks. As there were many observed instances of crossing outside of crosswalks by the Pedestrian and Safety Study, it is recommended that "No Ped X-ing" signs be installed facing both the northbound and southbound directions mid-block on Estara Avenue and that pedestrians be redirected to cross Estara Avenue at the designated crosswalks at Fletcher Drive or Marguerite Street. It is also recommended that "No Ped X-ing" signs be installed facing both the eastbound and westbound directions on Marguerite Street (between West Avenue 33 and Estara Avenue) and that pedestrians be redirected to cross Marguerite Street at the designated crosswalks at West Avenue 33 or Estara Avenue.

Significance Determination

Less than significant.

Mitigation Measures

No mitigation measures are required.

[5] California Department of Transportation (Caltrans). January 5, 2024. RE: Irving Middle School Major Modernization Project (NOP).

Impact 3.6-3: The Project would not be located on a site that is adjacent to or near a major arterial roadway or freeway that may pose a safety hazard.

Construction

For regional construction traffic accessing State Route 2 (SR-2), access would be via the San Fernando Road on/off-ramps southwest of the site, or via Eagle Rock Boulevard ramps east of the site, before turning onto Avenue 36 to Fletcher Drive. The site has been in operation with proximity to SR-2 and adjacent to Fletcher Drive. Operation is expected to be maintained throughout all construction phases. Morning drop-off/circulation patterns were observed at Fletcher Drive, an Avenue II roadway, during the development of the *Pedestrian and Safety Study*. The site is expected to maintain the operation of Fletcher Drive access points during construction activities, and impacts related to proximity of a major arterial roadway are expected to be less than significant. As construction activity may increase traffic along Fletcher Drive, recommendations in the *Pedestrian and Safety Study,* should be considered, but are not required as part of the Project.

Operation

The Project site is located adjacent to Fletcher Drive, an Avenue II roadway. The site has been operational as a school with this proximity to Fletcher Drive before construction and would continue to be operational after construction is completed. The proposed Project would not increase the existing number of students or staff and, therefore, it would not generate new (permanent) traffic to the study area. The proposed Project would not include changes to existing roadways, and would be designed to enhance path of travel, Americans with Disabilities Act (ADA) compliant accessibility, and other pedestrian travel throughout the Campus. Fletcher Drive was identified as a High Injury Network (HIN) road by the Vision Zero Task Force. The Project would not change traffic patterns surrounding the school; therefore, impacts would be less than significant. Additional recommendations are contained in the *Pedestrian and Safety Study* to further improve safe routes to school, but are not required as part of the Project.

Significance Determination

Less than significant.

Mitigation Measures

No mitigation is required.

3.6.6 Cumulative Impacts

There would be temporary and short-term pedestrian safety impacts in relation to construction activities of the proposed Project. Access routes for construction vehicles may potentially increase hazards to pedestrian safety. There are no other proposed projects occurring within the Project site, so all potential cumulative impacts are related to this Project. Cumulative context includes temporary aspects of construction-related activities. Temporary and short-term construction-related impacts associated with the Project would be related to

disrupted safe pedestrian access routes. LAUSD shall encourage its contractor to limit construction-related trucks to off-peak commute periods, avoiding cumulative impacts by having vehicle trips scheduled for times where other vehicles would not be on the road, and when school children are less likely to be commuting to school using passenger vehicles, public transit, pedestrian crossings, and sidewalks. As such, the proposed Project's temporary contribution to any pedestrian safety related cumulative impacts during construction would not be cumulatively considerable and the associated cumulative impacts would be less than significant.

3.6.7 References

California Department of Transportation (Caltrans). January 5, 2024. RE: Irving Middle School Major Modernization Project (NOP).

Los Angeles Department of Transportation (LADOT). N.d. VISION ZERO: Fletcher Drive Safety Improvements. https:// ladotlivablestreets.org/projects/fletcher (accessed January 24, 2024).

Los Angeles Unified School District, Design Standards Department. August 2023. School Design Guide: Los Angeles Unified School District.

Moveit. N.d. Directions from Fletcher/Estara Bus Station to Irving Steam Magnet Middle School. Accessed August 25, 2023. https://moovitapp.com/los_angeles_ca-302/poi/Irving%20Middle%20School%20%28Irving%20Steam%20Magnet%29/Fletcher%20~2F%20Estara/en?metroSeoName=Los_Angeles_CA&customerId=4908&ref=1&af_sub8=%2Findex%2Fen%2Fpublic_transit-Fletcher_Estara-Los_Angeles_CA-stop_46202082-302&af_sub9=Search%20bar%20button&fll=34.11799_-118.24153&tll=34.11756_-118.24152&poiType=stop&tsid=46202082,46202082 (accessed August 25, 2023).

3.7 Transportation and Traffic

This section provides an assessment of potential impacts related to transportation and traffic that could result from implementation of the Project. Potential impacts addressed in this section are associated with conflicts with a plan proposed, ordinance or policy establishing measures of effectiveness for the performance of the circulation system; introduction of safety/risk elements related to traffic hazards, and emergency vehicle access; and conflicts with adopted plans related to alternative transportation modes (transit, pedestrian, bicycle). The analysis in this section is primarily based on the *Pedestrian and Safety Study* (Appendix 8 to the EIR). Linscott, Law & Greenspan, Engineers (LLG) conducted field observation site visits to Irving MS on October 5, 2023, for the traffic and pedestrian safety assessment. The *Pedestrian and Safety Study* is used for context in the analysis of this section. LAUSD received scoping comments (Appendix 3) regarding increases in traffic, potential road closures, student drop-off/pick-up traffic, circulation on the streets surrounding the Campus, West Avenue 32, Estara Avenue, Fletcher Drive, and Marguerite Street. These comments are addressed in this section.

3.7.1 Environmental Setting

Vehicular access for the Project site is provided by a series of local roads and an Avenue II road. The Project site is bounded by Fletcher Drive to the northwest, Estara Avenue to the northeast, Marguerite Street and State Route (SR)-2 (elevated freeway with no exit point until San Fernando Road approximately 0.2 mile southwest of the Project site) to the southeast, and West Avenue 32 to the southwest. These roads would be used for construction related traffic and transportation. Characteristics of the existing roadway system in the Project vicinity are shown in **Table 3.7-1, *Study Area Roadway System***.

TABLE 3.7-1
STUDY AREA ROADWAY SYSTEM

Roadway	Type	Number of Travel Lanes	Sidewalks	Bicycle Lanes
Fletcher Drive	Avenue II	Two	Yes	Yes
Estara Avenue	Local Street – Standard	Two	Yes	No
Marguerite Street	Local Street – Standard	Two	Yes	No
West Avenue 32	Local Street – Standard	Two	Yes	No

Field observations were conducted at the main Irving MS loading area (i.e., on Marguerite Street) during the morning drop-off peak period (i.e., between 7:15 AM and 8:15 AM) and afternoon pick-up peak period (i.e., between 2:30 PM and 3:30 PM) during a typical midweek school day (Thursday, October 5, 2023) and at the secondary loading areas at Estara Avenue, Fletcher Drive, and West Avenue 32. Existing traffic counts were obtained by Counts Unlimited on Thursday, October 19, 2023, from 7:00 AM to 9:00 AM to determine the weekday school AM peak hour and from 2:00 PM to 4:00 PM to determine the weekday school PM peak hour.

The main vehicular drop-off/pick-up loading zone is located at the south side of the Campus along the north side of Marguerite Street between West Avenue 33 and Estara Avenue. The school also operates school buses, which load/unload on the east side of West Avenue 32 and onsite within the parking lot (former Roswell Street).

Students, faculty, and staff can currently also travel to school using public transit routes, bicycles, and by walking. There are sidewalks on all streets surrounding the school. In addition, LAUSD encourages ride-sharing programs for students and teachers, as well as riding bicycles to school. A bicycle rack is available near the main school entrance along Estara Avenue. Transit service to the Project site is provided by the Los Angeles Metropolitan Transportation Authority (Metro), which operates Bus Line 182 along Fletcher Drive with two nearby bus stops: Fletcher Drive/West Avenue 32 (0.3 mile southwest) and Fletcher Drive/Estara Avenue (0.1 mile northwest).

3.7.2 Regulatory Setting

State

There are no state regulatory transportation plans or programs that are applicable to potential impacts of the proposed Project's temporary construction-period activities.

Regional

There are no regional regulatory transportation plans or programs that are applicable to potential impacts of the proposed Project's temporary construction-period activities.

Local

City of Los Angeles Traffic Study Policies and Procedures. The significance of project-generated traffic impacts on roadways under the jurisdiction of the City of Los Angeles is determined based on criteria established by that jurisdiction.

LAUSD School Design Guide. The 2023 LAUSD School Design Guide includes guidelines for vehicular access, parking, and pedestrian safety.[1] Parent drop-off/pick-up areas, bus loading areas, and parking areas are required to be separated to allow safe student access. Parent drop-off/pick-up areas shall also be located adjacent to the main entry gate of the school. Additionally, parent and bus loading areas shall be separated to minimize traffic conflicts.

3.7.3 Thresholds of Significance

For the purposes of this EIR, LAUSD has used the checklist questions in Appendix G of the CEQA Guidelines as the significance criteria, along with applicable thresholds of significance established by the local jurisdiction (City of Los Angeles), to determine whether the Project would have a significant environmental impact regarding Transportation and Traffic. Based on the size and scope of the Project and the potential for impacts, the criteria identified below are included for evaluation in this EIR. Criteria (b) was determined to be less than significant by the Initial Study and, therefore, is not carried forward for analysis in the EIR.

[1] Los Angeles Unified School District, Design Standards Department. August 2023. School Design Guide: Los Angeles Unified School District.

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

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

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

d) Result in inadequate emergency access?

3.7.4 Methodology

It is anticipated that Campus operations would be more efficient or would be otherwise improved following implementation of the proposed Project, which would result in new and upgraded facilities, and would not result in substantive changes to the existing operation of the school. Project implementation would not provide for an increase in the number of students attending the school or staff required to operate the school. As such, operational activities associated with the proposed Project are not additive to those operations analyzed in the 2023 SPEIR and would not result in substantial changes that have not previously been identified in the 2023 SPEIR. Specifically related to the traffic analysis presented herein, there would be no permanent increase in traffic generated by the school. Therefore, this analysis primarily focuses on potential impacts associated with temporary increases in traffic associated with Project construction activity.

This analysis estimates construction trip generation using forecasts of construction workers and trucks provided by LAUSD and evaluates the effect of Project construction-generated traffic on traffic flow, based on the general carrying capacities of two-lane and four-lane roadways. The analysis in this section is primarily based on the *Pedestrian and Safety Study* (Appendix 8). LLG conducted field observation site visits to Irving MS on October 5, 2023, for the traffic and pedestrian safety assessment. Additionally, traffic counts were conducted on October 19, 2023.

Standard Conditions

Projects implemented under the 2023 SPEIR are anticipated to have less-than-significant impacts related to transportation and circulation within the LAUSD service area with the incorporation of Standard Conditions (SCs). Applicable SCs related to Project-specific impacts to traffic and transportation are provided in **Table 3.7-2, *Transportation and Traffic Standard Conditions of Approval***.

TABLE 3.7-2
TRANSPORTATION AND TRAFFIC STANDARD CONDITIONS OF APPROVAL

Applicable SCs	Description
SC-PED-1	LAUSD shall participate in the Safe Routes to School (SR2S) program. **Caltrans SR2S program.** LAUSD is a participant in the SR2S program administered by Caltrans, local law enforcement, and transportation agencies. OEHS provides pedestrian safety evaluations as a component of traffic studies conducted for new school projects. This pedestrian safety evaluation includes a determination of whether adequate walkways and sidewalks are provided along the perimeter of, across from, and adjacent to a proposed school site and along the paths of identified pedestrian routes within a 0.25-mile radius of a proposed school site. The purpose of this review is to ensure that pedestrians are adequately separated from vehicular traffic.
SC-PED-2	LAUSD shall implement the applicable requirements and recommendations associated with the OEHS Traffic and Pedestrian Safety Program. **OEHS Traffic and Pedestrian Safety Program** LAUSD has developed these performance guidelines to minimize potential pedestrian safety risks to students, faculty and staff, and visitors at LAUSD schools. The performance guidelines include the requirements for: student drop-off areas, vehicle access, and pedestrian routes to school. School traffic/circulation studies shall identify measures to ensure separation between pedestrians and vehicles along potential pedestrian routes, such as sidewalks, crosswalks, bike paths, crossing guards, pedestrian and traffic signals, stop signs, warning signs, and other pedestrian access measures.
SC-PED-3	LAUSD shall implement the applicable sidewalk requirements outlined in the School Design Guide. LAUSD shall also coordinate with the responsible traffic jurisdiction/agency to implement infrastructure improvements prior to the opening of a school. Improvements shall include, but are not limited to: • Clearly designate passenger loading areas with the use of signage, painted curbs, etc. • Install new walkway and/or sidewalk segments where none exist. • Substandard walkway/sidewalk segments shall be improved to a minimum of eight feet wide. Provide other alternative measures that separate foot traffic from vehicular traffic, such as distinct travel pathways or barricades.
SC-PED-4	LAUSD shall design the project to comply with the traffic and pedestrian guidelines in the School Traffic Safety Reference Guide. **School Traffic Safety Reference Guide REF- 4492.21.** This Reference Guide replaces Reference Guide 4492.2, School Traffic Safety, October 26, 2020. Updated information is provided, including new guidance on passenger loading zones and the Safety Valet Program. This guide sets forth requirements for traffic and pedestrian safety, and procedures for school principals to request assistance from OEHS, the Los Angeles Schools Police Department (LASPD), or the local police department regarding traffic and pedestrian safety. Distribution and posting of the Back to School Safety Tips flyer is required. This guide also includes procedures for traffic surveys, parking restrictions, crosswalks, advance warning signs (school zone), school parking signage, traffic controls, crossing guards, or for determinations on whether vehicle enforcement is required to ensure the safety of students and staff.

TABLE 3.7-2
TRANSPORTATION AND TRAFFIC STANDARD CONDITIONS OF APPROVAL

Applicable SCs	Description
SC-PED-5	LAUSD shall des8ign new student drop-off, pick-up, bus loading areas, and parking areas to comply with the School Design Guide. **School Design Guide.** The Guide states student drop-off and pick-up, bus loading areas, and parking areas shall be separated to allow students to enter and exit the school grounds safely.
SC-T-3	Implementation of SC-T-3.
SC-T-4	Implementation of SC-T-4.

3.7.5 Impact Analysis

Impact 3.7-1: The Project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities.

Construction

Construction of the Project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. In general, adopted policies, plans, and programs pertaining to public transit, bicycle, and pedestrian travel are intended to be used for long-term planning purposes and do not apply to construction activities. Based on information provided by LAUSD, the Project's construction would last an estimated 42 months. There would be five general activity construction phases in these four separate zones:

- Development Zone A - Phase 1: Set-up Interim Housing
- Development Zone B - Phase 2: Demolish Administration Building
- Development Zone B - Phase 3: Construct New Administration and Classroom Building
- Development Zone C - Phase 4: Remove Homemaking Building, Classroom Building, 6 Bungalows, and Interim Housing
- Development Zone D - Phase 5: Landscaping, Hardscaping, Parking Site Work

Construction-related activities would be scheduled during daylight hours, and construction-related traffic and deliveries would be scheduled with school administration to avoid student pick-up/drop-off hours. Trip generation equations provided by the *Pedestrian and Safety Study* (Appendix 8) were based on the development of construction worker and truck forecasts given the expected hauling/delivery capacities, with the additional application of passenger car equivalency factors. At the most, up to 70 haul trucks per day, with 35 inbound and 35 outbound trucks are anticipated. As provided in the *Pedestrian and Safety Study*, assuming passenger car equivalency (PCE) factor of 2.5 to account for heavier weight and larger trucks, 10 inbound truck PCE trips and 10 outbound truck PCE trips may also occur during the weekday peak hours. Equipment and delivery trucks would account for additional trips to and from the Project site. This would mean an additional 12

inbound trucks and 12 outbound trucks, with an assumed 48 daily PCE trips generated. Construction would likely occur most intensively in the summer when school is not in session. 150 workers are anticipated to work in summer months, and 50 construction workers would be expected during school operations. The *Pedestrian and Safety Study* provides construction worker vehicles estimates using an average vehicle ridership (AVR) factor of 1.135 persons per vehicle, stating that about 88 vehicle trips, 44 inbound and 44 outbound, would be expected per day during phases with 50 construction workers.

Access to and from the school during construction would be minimally altered, as the majority of the construction would occur within the Campus. Any temporary changes to pedestrian access during construction would be completed as outlined in a worksite traffic control plan for the proposed Project (per SC-T-4). The modified parking lots would be designed per the requirements of LAUSD and LADOT. The Project site currently consists of 149 parking spaces, of which 47 are unmarked compact spaces. During construction, a minimum of 80 parking stalls would be maintained. Though parking may be reconfigured during construction, parking and circulation would be maintained throughout construction activities. Construction vehicles accessing the Campus would avoid drop-off and pick-up during peak hours, and construction-related access and traffic specifics would be coordinated with the Campus administrators, LAUSD's Transportation Branch, and Office of Environmental Health and Safety and would be detailed in the worksite traffic control plan. The performance of vehicular, pedestrian, bicycle, or transit travel would not be significantly impacted by the proposed Project construction.

Operation

As the proposed Project would not increase the existing number of students or staff, it would not generate new (permanent) traffic to the study area. The proposed Project would not directly or indirectly eliminate alternative modes of transportation, transportation corridors, or facilities (e.g., bus stops). Further, the proposed Project would not prevent the use of any roads on which public transit routes operate, school enrollment would remain the same following the Project as stated above, and there would be no permanent increase in traffic generated by the school. The Project site currently consists of 149 parking spaces, of which 47 are unmarked compact spaces. After construction, a minimum of 104 stalls would be maintained. Parking would be reduced by 69 parking spaces during construction and replaced with 24 new parking spaces, for an overall total of 104 parking spaces after implementation of the proposed Project. The removal of parking spaces south of former Roswell Street would be anticipated by the Project Plan to allow more space for the new Administration and Classroom Building. One new vehicular access point would be added as a part of the Project plan, along the north side of Marguerite Street and would provide new parking spaces. New landscaping or hardscaping areas may be reconfigured over the course of construction, meaning that parking spaces may be moved or changed. However, after construction, parking requirements would either be met or exceeded. Octavia Gate 3 would be relocated as well. However, there would be no changes to existing vehicular access points. Thus, there would be less than significant impacts in relation to conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. Additional recommendations for improving site accessibility for safe transportation and circulation were provided by the *Pedestrian and Safety Study* (Appendix 8).

Significance Determination

Less than significant impact.

Mitigation Measures

No mitigation measures are required.

Impact 3.7-3: The Project would not substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).

Construction

Construction of the Project would not substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment). Construction would result in temporary less than significant impacts to transportation uses at the street and sidewalk adjacent to the Project site. The Project would be constructed within the gated Campus and staging would be conducted outside of the public right-of-way. There is a possibility that streets on or adjacent to the Campus would need to be repaved and restriped as part of the construction of the Project, meaning for a brief time during construction phasing, their use would be impacted. Additionally, construction activity-based traffic from haul routes and vehicles entering and exiting Campus driveways may pose risks to pedestrian safety and access to the Irving MS Campus.

Existing sidewalks on Fletcher Drive, Estara Avenue, Marguerite Street, and West Avenue 32 would be maintained through construction, and continued use of these sidewalks is expected.

The Project site would still function as a school, and the school would remain operational throughout construction activity. The proposed Project would not interfere with the public rights-of-way, except for construction vehicle entry and exiting from the site and traffic from construction activities, such as materials delivery and use of haul routes. The California Department of Transportation (Caltrans) recommends working with Caltrans Office of Permits, Multi-Modal Unit, for a designated truck route for construction trucks to transport construction equipment to and from the construction sites. Construction vehicles and equipment should use alternative routes to avoid congested state facilities, especially during peak hours. Finally, construction trucks may be covered with tarpaulin (heavy-duty waterproof cloth) to avoid debris spillage onto State facilities.[2]

Operation

The Project would not change the use of the school, and the Campus would continue to operate as a school. The Project would alter school building features, but would not introduce any incompatible uses, sharp curves, or dangerous intersections. The Project would be implemented at an existing school site and would not directly or indirectly alter the configuration of the existing street system. There would be no changes in traffic patterns

[2] California Department of Transportation (Caltrans). January 5, 2024. RE: Irving Middle School Major Modernization Project (NOP).

around the school following construction completion. The Project would be bounded within the proposed site, with plans to improve portions of parking lots and playgrounds located on the Project site. Any areas located directly above the fault would be turned into outdoor areas, such as hardscape, landscape, or parking. The proposed Project would also provide for required ADA upgrades at locations impacted by the Project scope. During operation, there would be no impact regarding the substantially increasing vehicular and/or pedestrian safety hazards due to incompatible uses.

Significance Determination

Less than significant impact.

Mitigation Measures

No mitigation measures are required.

Impact 3.7-4: The Project would not result in inadequate emergency access.

Construction

Construction of the Project would not result in inadequate emergency access. Emergency vehicle access is required to be maintained during temporary construction activities. As stated in the *Pedestrian and Safety Study* (Appendix 8), emergency vehicles would continue to maintain use of the surrounding street system during construction activities. If portions of roadways are temporarily used for construction staging, emergency drivers are trained to use an alternative path, including center turn lanes and oncoming traffic lanes. Thus, even in the event of temporary construction closures, emergency vehicles within urban areas are capable of navigating such closures. Additionally, this Project must conform to local ordinances to ensure emergency access before and after the Project is constructed and implemented. Construction activities would not obstruct emergency access on the Campus because driveways would remain open. There would also be no anticipated access issues into the Campus during construction. Therefore, as construction activity is limited and emergency vehicles are trained to navigate urban streets with potential construction activity, there would be less than significant impacts in relation to inadequate emergency access.

Operation

There would be no anticipated access issues for the Campus during operation. The Project would conform to local ordinances to ensure emergency access during operation of the Campus following construction completion. The addition of a new parking lot to the site would allow greater access for emergency services during operation. All existing vehicular access points would remain after construction is complete. Therefore, there would be less than significant impacts in relation to inadequate emergency access.

Significance Determination

Less than significant impact.

Mitigation Measures

No mitigation measures are required.

3.7.6 Cumulative Impacts

There would be temporary and short-term traffic impacts in relation to construction activities of the proposed Project. Access routes for construction vehicles may increase hazards associated with construction activities. Cumulative context includes temporary aspects of construction-related activities. Temporary and short-term construction-related impacts associated with the Project would be related to truck routes and construction area access routes used by construction workers and material haulers, which would have potential impacts on transportation and traffic related hazards. Pursuant to SC-T-4, LAUSD shall require its contractors to submit a construction worksite traffic control plan to the City of Los Angeles for review prior to construction. The plan shall show the location of any haul routes, hours of operation, protective devices, warning signs, and access to abutting properties. LAUSD shall encourage its contractor to limit construction-related trucks to off-peak commute periods, avoiding cumulative impacts by having vehicle trips scheduled for times where other vehicles would not be on the road. As such, the proposed Project's contribution to any transportation and traffic-related cumulative impacts during construction would not be cumulatively considerable and the associated cumulative impacts would be less than significant.

3.7.7 References

California Department of Transportation (Caltrans). January 5, 2024. RE: Irving Middle School Major Modernization Project (NOP).

Los Angeles Unified School District, Design Standards Department. August 2023. School Design Guide: Los Angeles Unified School District.

CHAPTER 4
Other CEQA Considerations

This chapter represents the evaluation of environmental impacts required by the CEQA that are not covered within the earlier chapters of this Draft EIR. These CEQA considerations include environmental effects that were found not to be significant, significant irreversible environmental changes that would be caused by the Project, growth-inducing impacts, and significant and unavoidable adverse impacts.

4.1 Effects Found Not to Be Significant

LAUSD, through the scoping process, determined that the proposed Project could cause or result in significant environmental impacts, and has warranted further analysis, public review, and disclosure through the preparation of an EIR. The NOP, dated December 1, 2023, was sent to the California Office of Planning and Research, State Clearinghouse (SCH), and was circulated for public review and public comment. The public comment period for the NOP was December 1, 2023, to January 5, 2024. The assigned SCH reference number for the Project is 2023120006. The NOP is included as Appendix 2 of this Draft EIR. The locations in the EIR where each comment has been addressed are indicated in Chapter 1, *Introduction*, Table 1.2-1, *Summary of NOP Comments*.

The Initial Study that was prepared for the Project and circulated with the NOP determined that some of the impacts would not occur or would be less than significant; therefore, these impact topics have not been further analyzed in this Draft EIR. Refer to Appendix 1 for the Initial Study.

Aesthetics

- **Scenic Vista** – Less than Significant Impact
- **Scenic Resources** – No Impact
- **Visual Character** – Less than Significant Impact
- **Light and Glare** – Less than Significant Impact

Agriculture and Forestry Resources

- **Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance** – No Impact
- **Williamson Act Contract** – No Impact
- **Timberland** – No Impact
- **Forest Land** – No Impact
- **Other Changes** – No Impact

Air Quality

- **Odors** – Less than Significant Impact

Biological Resources

- **Candidate, Sensitive, or Special Status Species** – No Impact
- **Riparian Habitat/Sensitive Natural Community** – No Impact
- **Wetlands** – No Impact
- **Wildlife Migration** - Less than Significant Impact
- **Local Policies/Ordinances Protecting Biological Resources** – Less than Significant Impact
- **Conservation Planning** – No Impact

Cultural Resources

- **Archaeological Resource** – Less than Significant Impact
- **Human Remains** – Less than Significant Impact

Energy

- **Energy Consumption –** Less than Significant Impact
- **State/Local Plan –** No Impact

Geology and Soils

- **Alquist-Priolo Fault Rupture** – No Impact
- **Seismic Ground Shaking** – No Impact
- **Ground Failure including Liquefaction** – No Impact
- **Landslides** – No Impact
- **Erosion or Loss of Topsoil** – Less than Significant Impact
- **Unstable Geologic Unit** – Less than Significant Impact
- **Expansive Soils** – Less than Significant Impact
- **Septic Tanks** – No Impact
- **Paleontological Resource** – Less than Significant Impact

Hazards and Hazardous Materials

- **Airport Land Use Plan** – No Impact
- **Emergency Planning** – No Impact
- **Wildland Fires** – No Impact

Hydrology and Water Quality

- **Water Quality Standards** – Less than Significant Impact
- **Groundwater Recharge** – No Impact
- **On- or Off-site Erosion or Siltation** – No Impact
- **On- or Off-site Flooding** – Less than Significant Impact
- **Runoff Water Quality** – No Impact
- **Flood Flows** – No Impact
- **Inundation by seiche, tsunami, or mudflow** – No Impact
- **Runoff –** No Impact

Land Use and Planning

- **Divide an Established Community** – No Impact
- **Conflict with Applicable Plans and/or Policies** – No Impact

Mineral Resources

- **Regional Mineral Resources** – No Impact
- **Local Mineral Resources** – No Impact

Noise

- **Private Airstrips** – No Impact

Population and Housing

- **Population Growth** – No Impact
- **Displacement of People/Housing** – No Impact

Public Services

- **Fire Protection** – No Impact
- **Police Protection** – No Impact
- **Schools** – No Impact
- **Parks** – No Impact
- **Other Public Facilities** – No Impact

Recreation

- **Accelerated Deterioration of Existing Facilities** – No Impact
- **Construction or Expansion of Recreational Facilities Causing Adverse Physical Effect on Environment** – No Impact

Transportation and Circulation

- **Vehicle Miles Traveled** – Less than Significant Impact

Tribal Cultural Resources

- **Tribal Cultural Resources** – Less than Significant Impact
- **California Register of Historical Resources** – Less than Significant Impact
- **Significance to Native American Tribe** – Less than Significant Impact

Utilities

- **Construction or Relocation of water, wastewater treatment or stormwater drainage, electric power, natural gas, telecommunication facilities –** No Impact
- **Water Supplies** – No Impact

- **Inadequate Wastewater Treatment Capacity** – No Impact
- **Landfill Capacity** – No Impact
- **Solid Waste Regulations** – No Impact

Wildfire

- **Located in High Fire Severity Zone** – Less than Significant Impact
- **Emergency plans** – Less then Significant Impact
- **Pollutant Concentration** – Less than Significant Impact
- **Require Installation of Infrastructure That May Impact the Environment** – Less than Significant Impact
- **Exposure to Flooding/Landslides** – Less than Significant Impact

4.2 Significant Environmental Effects

Table ES-1, *Summary of Impacts and Mitigation Measures for the Irving Middle School Major Modernization Project*, which is in Chapter ES, *Executive Summary*, and Section 3.1 through Section 3.6 of this Draft EIR provide a comprehensive identification of the Project's environmental effects, including the level of significance both before and after mitigation.

4.3 Significant Environmental Effects That Cannot Be Avoided if the Project Is Implemented

CEQA Guidelines Section 15126.2(c) requires that an EIR describe any significant impacts that cannot be avoided, even with the implementation of feasible mitigation measures. Development of the Project would result in significant and unavoidable impacts to Cultural Resources. Sections 3.1 through Section 3.7 of this Draft EIR provide a comprehensive identification of the Project's environmental effects, including the level of significance both before and after mitigation.

Cultural Resources

The proposed Project would result in significant and unavoidable impacts with respect to **Impact 3.2.1, Significant Historical Resource**. As documented in the Historic Resource Evaluation Report (HRER; Appendix 1-B), the Washington Irving Middle School Historic District, with six historic buildings on the Irving MS campus recommended as contributors, is eligible for federal, state, and local designation, and is considered to be a historical resource for the purposes of CEQA and a historic property for the purposes of the National Historic Preservation Act (NHPA). The six historic buildings were assigned a National Register of Historic Places (NRHP) status code of 3D, and appear eligible for listing in the NRHP as contributors to an NRHP-eligible district through survey evaluation; none of the six historic buildings were recommended as individually eligible.[1] A Historic Resources Technical Report (HRTR), prepared as part of this Draft EIR (Appendix 5), evaluated the potential for implementation of the Project to substantially change the significance of historical resources on the campus. As the Project would result in the demolition of a primary contributor to the Historic District, Impact 3.2.1 would be potentially significant, and implementation of mitigation measure MM-CUL-1 would be required.

[1] Heumann, Leslie, & Associates, and Anne Doehne. March 2002. Historic Schools of the Los Angeles Unified School District. Science Applications International Corporation, a presentation prepared for LAUSD Facilities Services Division.

Implementation of LAUSD SCs and mitigation measure MM-CUL-1 would reduce significant impacts to historic resources scheduled for demolition to the maximum extent practicable and result in a less than significant impact based on California Register of Historic Resources (CRHR) eligibility criteria. However, the demolition of the Administration Building would remain a significant adverse impact in relation to eligibility for the NRHP, even after application of implementation of LAUSD SCs and mitigation measures.

4.4 Significant Irreversible Changes

CEQA Guidelines 21100(b)(2) and 15126.2(d) require that any significant effect on the environment that would be irreversible if the proposed Project is implemented must be identified. Pursuant to CEQA Guidelines Section 15126.2(d), an EIR must consider any significant irreversible environmental changes that would be caused by the proposed Project should it be implemented. Section 15126.2(d) states:

> *Uses of nonrenewable resources during the initial and continued phases of the project may be irreversible since a large commitment of such resources makes removal or nonuse thereafter unlikely. Primary impacts and, particularly, secondary impacts (such as highway improvement which provides access to a previously inaccessible area) generally commit future generations to similar uses. Also, irreversible damage can result from environmental accidents associated with the project. Irretrievable commitments of resources should be evaluated to ensure that such current consumption is justified.*

Resources that would be permanently and continually consumed by implementation of the proposed Project include energy, water, and fossil fuels; however, the amount and rate of consumption of these resources would not result in the unnecessary, inefficient, or wasteful use of resources, as discussed in the Initial Study (Appendix 1).

Construction and operation of the proposed Project would require the use and consumption of nonrenewable resources, such as steel and other metals. Renewable resources, such as lumber and other wood byproducts, would also be used. Unlike renewable resources, nonrenewable resources cannot be regenerated over time. Construction of school facilities would require the commitment of a relatively small amount of building materials. The quantity of building materials used during implementation of the proposed Project would result in a less than significant impact because these types of resources are anticipated to be in adequate supply into the foreseeable future.

Energy would be consumed during both construction and operation of the proposed Project. Nonrenewable resources and energy would also be consumed during the manufacturing and transportation of building materials, preparation of the site, and construction and site restoration activities. The proposed Project would not result in the wasteful, inefficient, or unnecessary consumption of energy during construction or operation. The proposed Project would result in the irretrievable and irreversible commitment of energy resources in the form of diesel fuel, gasoline and electricity during construction and operation. However, these types of resources are anticipated to be in adequate supply into the foreseeable future. Further, the proposed Project's new buildings and structures would be designed to reduce energy use below current levels by incorporating modernized and energy-efficient features, which may include lighting, windows, electrical transformers, building insulation, or installation of irrigation smart controllers, etc. The roofing of the new buildings would meet "cool roof" building certification requirements. All new construction would exceed by 10 percent or more the California Title 24, Part 6 energy efficient standards. These energy management systems, and project design features, would reduce potential significant impacts regarding energy use to less than significant levels. Therefore, impacts due to these irretrievable and irreversible commitments of resources would be less than significant.

4.5 GROWTH-INDUCING IMPACTS

The CEQA Guidelines (Section 15126.2(e)) require that an EIR discuss the potential growth-inducing impacts of a proposed project. The CEQA Guidelines provide the following guidance for such discussion:

> *"Discuss the ways in which the proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. Included in this are projects which would remove obstacles to population growth (a major expansion of a waste water treatment plant might, for example, allow for more construction in service areas). Increases in the population may tax existing community service facilities, requiring construction of new facilities that could cause significant environmental effects. Also discuss the characteristic of some projects which may encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively. It must not be assumed that growth in any area is necessarily beneficial, detrimental, or of little significance to the environment."*

A project could directly and/or indirectly induce growth. Direct growth inducement, for example, would result if a project involved construction of new housing. A project could induce indirect growth, for example, if it establishes substantial new permanent employment opportunities (e.g., commercial, industrial, or governmental enterprises) or if it would involve a substantial construction effort with short-term employment opportunities while indirectly stimulate the need for additional housing and services to support the new employment demand. Similarly, under CEQA, a project would indirectly induce growth if it would remove an obstacle to additional growth and development, such as removing a constraint on a required public service. Under CEQA, growth is not considered necessarily detrimental or beneficial.

Based on the CEQA definition above, assessing the growth-inducement of the proposed Project involves answering the question: "Would implementation of the proposed Project directly, or indirectly, support economic expansion, population growth, or residential construction?" Schools are one of the chief public services needed to support growth and community development. While schools play a role in supporting additional growth, it is not the single determinant of such growth. Other factors, including General Plan policies, land use plans, and zoning, the availability of solid waste disposal capacity, wastewater treatment, transportation services, and other important public infrastructure also influence business and residential population growth. Economic factors, in particular, greatly affect development rates and locations.

Growth Projections

Implementation of the proposed Project would not result in substantial permanent, or short-term, construction employment that could indirectly induce population growth by establishing new employment opportunities. The proposed Project would reduce the number of classrooms from 65 to 46 on campus. Therefore, an increase in staff requirements is not anticipated. The temporary construction employment opportunities are expected to be sufficiently filled by workers within 30 miles of the Project site, and new housing for construction employees would not be required.[2] The labor force, as of December 2023, for Los Angeles County is 4,981,000 with an unemployment rate of 5.3 percent.[3] Project implementation would not extend major infrastructure to places currently unserved by such facilities. The proposed Project is a modernization Project of an existing

[2] State of California, Employment Development Department. March 2022. Monthly Labor Force Data for Cities and Census Designated Places (CDP). https://labormarketinfo.edd.ca.gov/geography/losangeles-county.html (accessed February 5, 2024).

[3] State of California, Employment Development Department. July 2023. Unemployment Rates and Labor Force. Labor Market Information for Los Angeles-Long Beach-Glendale Metropolitan District (Los Angeles County). https://labormarketinfo.edd.ca.gov/geography/losangeles-county.html (accessed February 5, 2024).

school campus. There is no existing housing, or any proposed housing, within the proposed Project site.[4] The surrounding area is developed and served by existing infrastructure and utilities. Therefore, the Project would not remove obstacles to growth. Therefore, the proposed Project would not have substantial direct, or indirect, growth-inducing impacts.

4.6 REFERENCES

City of Los Angeles. 2021. City of Los Angeles General Plan. 2021-2029 Housing Element.

State of California, Employment Development Department. March 2022. Monthly Labor Force Data for Cities and Census Designated Places (CDP). https://labormarketinfo.edd.ca.gov/geography/losangeles-county.html (accessed February 5, 2024).

State of California, Employment Development Department. July 2023. Unemployment Rates and Labor Force. Labor Market Information for Los Angeles-Long Beach-Glendale Metropolitan District (Los Angeles County). https://labormarketinfo.edd.ca.gov/geography/losangeles-county.html (accessed February 5, 2024).

[4] City of Los Angeles. 2021. City of Los Angeles General Plan. 2021-2029 Housing Element.

CHAPTER 5
Alternatives

5.1 Introduction

This section addresses alternatives to the proposed Project, describes the rationale for their evaluation in this Draft EIR, evaluates the potential environmental impacts associated with each alternative, and compares the relative impacts of each alternative to those of the proposed Project. In addition, this section analyzes the extent to which each alternative meets the Project's objectives identified in Chapter 2, *Project Description*.

CEQA requires that an EIR consider a reasonable range of feasible alternatives (Section 15126.6(a)). According to the CEQA Guidelines, alternatives should be those that would attain most of the basic project objectives and avoid, or substantially lessen, one, or more, significant effects of the project (Section 15126.6). The "range of alternatives" is governed by the "rule of reason," which requires the EIR to set forth only those alternatives necessary to permit an informed and reasoned choice by the lead agency and to foster meaningful public participation (Section 15126.6(f)).

CEQA also requires that the feasibility of alternatives be considered. The CEQA Guidelines Section 15126.6(f)(1) states that among the factors that may be taken into account in determining feasibility are: site suitability; economic viability; availability of infrastructure; general plan consistency; other plans and regulatory limitations; jurisdictional boundaries; and (when evaluating alternative project locations) whether the proponent can reasonably acquire, control, or otherwise have access to an alternative site. Furthermore, an EIR need not consider an alternative whose effects could not be reasonably identified, whose implementation is remote, or speculative, or that would not achieve the basic project objectives.

The alternatives addressed in this EIR were identified in consideration of the factors listed below.

- The extent to which the alternative could avoid, or substantially lessen, the identified significant environmental effects of the proposed Project
- The extent to which the alternative could accomplish basic objectives of the proposed Project
- The feasibility of the alternative
    - Including economic viability or regulatory limitations
- The requirement of the State CEQA Guidelines to consider a "no project" alternative

CEQA Guidelines Section 15126.6(e)(1) states that a no project alternative shall also be evaluated along with its impacts. The purpose of describing and analyzing a no project alternative is to allow decision-makers to compare the impacts of approving the proposed Project with the impacts of not approving the proposed Project. The no project alternative analysis is not the baseline for determining whether the proposed Project's environmental impacts may be significant, unless it is identical to the existing environmental setting analysis which does establish that baseline.

5.2 Project Objectives

The LAUSD SUP includes objectives, goals, and principles that are intended to guide the development of facilities that improve student health, safety, and educational quality.

The SUP goals and principles established by the Board of Education are as follows:

- Schools should be physically safe and secure
- School building systems should be sound and efficient
- School facilities should align with instructional requirements and vision

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

- The buildings that have been identified as requiring seismic upgrades must be addressed.
- The buildings, grounds and site infrastructure determined to have significant/severe physical conditions that already do [or are highly likely (in the near future) to pose a health and safety risk or negatively impact a school's ability to deliver the instructional program and/or operate must be addressed.
- The school's reliance on relocatable buildings, especially for K–12 instruction, should be significantly reduced.
- Necessary and prioritized upgrades must be made throughout the school site in order to comply with the program accessibility requirements of the Americans with Disabilities Act (ADA) Title II Regulations, and the provisions of the Modified Consent Decree (MCD).
- The exterior conditions of the school site should be addressed to improve the visual appearance including landscape, hardscape, and painting.
- The interior physical conditions of classroom buildings that would otherwise not be addressed should be improved.

CEQA Guidelines Section 15124 requires an EIR to include a statement of objectives sought by the proposed Project. The objectives assist in developing the range of Project alternatives to be evaluated in the EIR. LAUSD has established the following objectives for the proposed Project:

- **Objective #1:** Buildings meeting AB 300 criteria for seismic evaluation may be addressed, to the extent feasible, with a focus on those determined to have a high seismic vulnerability, through retrofit, removal, or seismic modernization, which will be determined based on an assessment of the seismic vulnerability of the building(s), the historic context of the building/site, actual or potential impact to the learning environment, site layout, and the approach that best ensures compliance with Division of the State Architect (DSA) requirements.
- **Objective #2:** The buildings, grounds, and site infrastructure that have significant/severe physical conditions that already do or are highly likely in the near future to pose a health and safety risk, or

negatively impact a school's ability to deliver the instructional program and/or operate may be addressed by repair or replacement.

- **Objective #3:** The District reliance on relocatable buildings, especially for K–12 instruction, should be reduced.

- **Objective #4:** Necessary and prioritized upgrades must be made throughout the school site in order to comply with the program accessibility requirements of the Americans with Disabilities Act (ADA) Title II Regulations, and the District's Self-Evaluation and Transition Plan under Title II of the ADA.

- **Objective #5:** The exterior conditions of the school site will be enhanced around new buildings and/or areas impacted by construction to improve the visual appearance including landscape and hardscape.

- **Objective #6:** Outdoor learning environments will be developed where the site layout and project planning provide the opportunity.

5.3 Alternatives Not Further Evaluated in This EIR

An EIR must briefly describe the rationale for selection and rejection of alternatives. The lead agency may make an initial determination as to which alternatives are potentially feasible and, therefore, merit in-depth consideration, and which are clearly infeasible. Alternatives that are remote, or speculative, or the effects of which cannot be reasonably predicted, need not be considered (CEQA Guidelines, Section 15126.6(f)(3)).

An alternative site, or location, for the Project need not be considered when its implementation is "remote and speculative," such as the site being out of the purview of the lead agency, or beyond the control of a project applicant. Alternative sites were not selected for evaluation in this EIR. CEQA Guidelines Section 15126.6(f)(2) specifies that the key question with alternative sites is "whether any of the significant effects of the project would be avoided or substantially lessened by putting the project at another location." The proposed Project is being implemented as part of the LAUSD SUP, which is intended to provide improvements, repairs, and maintenance to existing LAUSD schools and future school expansions and to benefit current and future students in the District. Therefore, implementation of the proposed major modernization of Irving Middle School at an alternative site or requiring closure of the Campus would not be feasible and could not be implemented. The following alternatives were initially considered, but were eliminated from further consideration in this EIR because they do not meet project objectives or were infeasible.

Rehabilitate Administration Building Alternative

Under this alternative, the Administration Building would be retained and undergo a voluntary seismic rehabilitation and a remodel to address substandard classroom sizes and building systems. This would include:

- Extensive foundation work under the portion of the building that falls within the "No Construction Zone" of the fault

- If possible, demolish and rebuild interior classroom partitions to align with the current educational standards of the district (960 square feet for general classrooms and 1,300 square feet for science and specialty classrooms)

- Upgrades to the existing building systems for the Administration Building, such as replacement of plumbing fixtures to meet current code, replacement of HVAC equipment, recertification of fire sprinkler system, replacement of data cabling, replacement of clock/bell system, replacement of PA system, and upgrade to telephone system

Section 4-317(c) and Section 4-309(c)1 of the California Building Code indicate that a voluntary seismic retrofit of the Administrative Building is allowable as long as the total cost of construction is under 50 percent of the value of the existing building. This means that the total cost of the construction (seismic retrofit, paint, finish upgrades, technology upgrades, ADA upgrades that do not impact more than 10 percent of the structural system, moving interior partitions, etc.) would need to be under 50 percent of the value of the building (or 40 percent at the time of DSA submission).

However, as detailed in **Appendix 9, *Alternatives Analysis Support Documents***, this alternative would not meet that cost threshold. Based on general assumptions without having formal design documents, the cost of a new classroom building is estimated to be approximately $846 per square foot, whereas a retrofit of the existing building alone, not including other improvements, may cost $492 per square foot. The seismic retrofit alone would exceed the 50 percent replacement value. When other project costs that are not related to the seismic retrofit (ADA improvements, updated fire alarm system, plumbing system replacement, finish replacements, etc.) are combined with the costs associated with the seismic retrofit, it would add approximately 15 to 35 percent more to the cost of construction. This will increase the cost of the alteration to exceed the 50 percent building replacement value and will preclude the possibility of preserving the existing building.

Even if the retrofit were feasible, the Administration Building would continue to be located within the fault zone, in direct violation of Section CAC 4-317(c) of the California Building Code and CA Ed Code 17212.5, as a grandfathered nonconforming structure. Therefore, this alternative was determined to be unviable.

Retain Portion of Existing Administration Building

Under this alternative, the approximately 28,000-square-foot portion of the existing Administration Building located on the fault zone, within 50 feet of the trace of an active fault (**Figure 5-1, Fault Lines and Additional Area of Effects**) would be demolished, and the approximately 26,000 square feet that is not on the fault would be retained. To replace this space, a new addition would be constructed to the remaining section of the Administration Building, located outside of the fault zone.

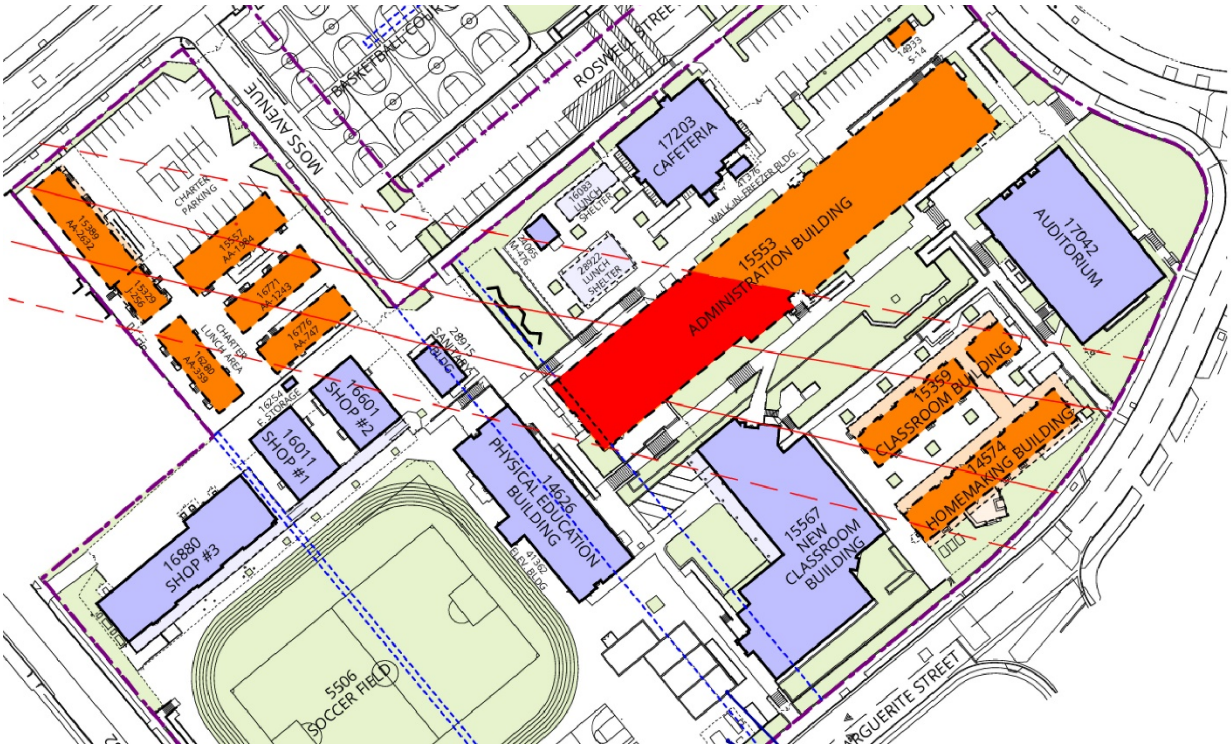

FIGURE 5-1. Fault Lines and Additional Area of Effects
NOTE: *Diagram showing the actual fault lines (solid red lines) and the additional area of effects (the dotted red lines flanking the solid red lines.) The portion of the Administration Building that is colored red is the portion the building with the areas affected by the fault.*

This alternative would be consistent with Section CAC 4-317(c) of the California Building Code and CA Ed Code 17212.5, which requires that no school building shall be constructed, rehabilitated (i.e., mandatory seismic retrofit), reconstructed, or relocated within 50 feet of the trace of an active fault. Due to the limited area available for development of a new building on the Campus, approximately 36,000 square feet of new construction would need to be located at the northern end of the existing Administration Building and to be at least three stories high on an approximately 12,000-square-foot footprint (see Appendix 9). This new construction would provide programming for eight classrooms, a library, and administrative spaces. Similar to the proposed Project, two permanent buildings (Homemaking Building and Classroom Building) totaling 8,493 square feet would also be demolished, and two new structures (M&O #1 and Modular Classroom Building for City of Angels) totaling 5,000 square feet would also be constructed. There would be a 19,000-square-foot decrease in new construction area and a 26,000-square-foot increase in remodel/seismic retrofit area on the Irving MS Campus compared to the proposed Project.

The remaining portion of the Administration Building would receive a remodel/seismic retrofit in tandem with the new construction. However, as detailed in Appendix 9, this scenario would present aesthetic, pragmatic, economic, and structural challenges that undermine its feasibility. The basement area of the existing area of the building to be demolished is a hub for multiple building systems that serve the campus. The main water service to the campus is here, along with distributions to the other buildings on campus, and the main sanitary lines. The main electrical distribution boards feeding the building are located here. The main telephone board,

television distribution, alarm controller, clock controller and fire alarm controller are also here. There would be extensive scope and costs involved to replace and relocate these systems.

Both the existing elevator as well as the girl's restrooms are in a portion of the building to be demolished. These would need to be relocated into the new addition. The existing HVAC equipment and routing in the existing portion to remain would require significant relocation and rerouting. The portion of the building to remain would require extensive structural improvement. Appendix 9 illustrates that more shear walls would need to be provided in the portion of the building that is to remain. There is also new foundation work associated with these shear walls. Of note, a quarter of the existing windows on this portion of the building would need to be infilled.

While this alternative would retain a portion of the exterior aesthetic of the 1936 Administration Building, it would not retain the distinctive symmetry of the existing Administration Building. The new three-story addition would overshadow the preserved portion of the Administration Building, thereby disrupting its historic character. Additionally, the structural upgrade for the remaining portion of the building would require infilling a quarter of the existing windows, further undermining the historic integrity of the building while also creating suboptimal daylight conditions for the classrooms. Therefore, this alternative would still result in a significant impact to historic resources.

With regard to the 50 percent cost threshold required by Section 4-317(c) and Section 4-309(c)1 of the California Building Code, since the Administration Building would no longer be within the fault zone under this alternative, costs associated with the structural seismic work could be excluded from the building replacement value, and it is possible that the cost of this alternative would be under the threshold. However, due to this alternative's inability to reduce impacts to historic resources to a less than significant level, it was determined to be unviable.

5.4 Review of Significant Environmental Impacts

Based on the CEQA Guidelines, several factors need to be considered in determining the range of alternatives to be analyzed in an EIR and the level of analytical detail that should be provided for each alternative. These factors include (1) the nature of the significant impacts of the proposed Project, (2) the ability of alternatives to avoid, or lessen, the significant impacts associated with the Project, (3) the ability of the alternatives to meet the objectives of the Project, and (4) the feasibility of the alternatives. Implementation of the proposed Project would result in a significant and unavoidable impact to Cultural Resources (3.2.1, Historic Resources). Implementation of the proposed Project would result in less than significant impacts with implementation of mitigation measures to Hazards and Hazardous Materials (Impacts 3.9.1, 3.9.2, 3.9.3, and 3.9.4).

This chapter includes a discussion of whether the alternatives would lessen these impacts. As the lead agency, the District will decide whether to proceed with the proposed Project, or whether to accept, or reject, an alternative identified in this chapter. As required by the CEQA Guidelines, if the District ultimately rejects an alternative, the rationale for the rejection will be presented in the findings that are required to be made before the District certifies the EIR and takes action on the Project.

5.5 Alternatives Selected for Analysis

The No Project Alternative and one project alternative scenario was selected for detailed analysis and represent a range of reasonable alternatives to the proposed Project (Table 5-1, *Comparison of Project Alternatives;* see Appendix 9). The identification of other alternatives beyond those evaluated below, and those not further evaluated as presented above in Section 5.4, is not practical given that the nature of the project—improvements to an existing school site—inherently limits the feasibility and applicability of additional alternatives. Although the one action alternative evaluated below has been determined in a feasibility analysis by LAUSD to have limited economic feasibility and may not meet all of the project objectives (see Table 5-3 below and Appendix 9), it was evaluated for the potential to reduce significant and unavoidable impacts of the project in relation to cultural resources to a less than significant level based on the findings of the HRTR (see Appendix 9).

The goal for evaluating these alternatives is to identify ways to avoid, or lessen, the significant environmental effects resulting from implementation of the proposed Project, while attaining most of the Project objectives.

Alternative 1: No Project/No Build Alternative

The No Project/No Build Alternative assumes that the Project site would remain as it is in existing conditions. A total of 154,057 square feet of existing permanent and portable buildings would remain on the campus. No demolition or construction of new buildings would occur on the Project site, and the existing facilities and infrastructure would continue to be susceptible to seismic damage and deteriorate. The Campus would continue to rely on portable classroom buildings and existing classrooms would remain undersized and compromised without specialty spaces. Only essential repairs such as repair of portable classrooms, replacement of lead pipes, and maintenance of fire alarm and fire suppression systems would occur over time.

The majority of the southwestern section and a small part of the middle section of the Administration Building would continue to rest in the 50-foot-wide zone adjacent to an active fault zone where it is likely there will be ground rupture during a major earthquake. Ground rupture is likely to severely damage the Administration Building structure south of the southernmost seismic joint.

Alternative 2: Retain Entire Existing Administration Building

Under this alternative, the Administration Building would remain as-is. The two other permanent buildings (Homemaking Building and Classroom Building) totaling 8,493 square feet would be demolished and two new structures (M&O #1 and Modular Classroom Building for City of Angels) totaling 5,000 square feet would be constructed (see Table 5-1). There would be no change in the square footage of portable buildings removed or existing buildings to remain as-is on Campus. There would be a 55,000-square-foot decrease in new construction area.

This alternative would make no changes to the exterior of the Administration Building, which would thus retain its eligibility as a district contributor, exemplifying the PWA Moderne architectural style. The distinctive features of horizontal lines, rhythmic façade, symmetry, and central entry point would be retained under this alternative, which has been considered for its potential to reduce significant impacts of the proposed project to historic resources.

Under this alternative, the Administration Building would remain in the fault zone as a grandfathered nonconforming structure. A voluntary seismic retrofit, as detailed in Appendix 9, would not take place and would not exceed the 50 percent building replacement threshold established by CAC Section 4-309(c)1. Therefore, the building would remain seismically vulnerable.

Additionally, by leaving the Administration Building as-is, classrooms spaces would continue to fail to align with the current educational standards of the District. The building contains 25 classrooms. Four classrooms meet the square footage requirements of the district (960 square feet for general classrooms and 1,300 square feet for science and specialty classrooms). Fifteen are significantly undersized and range from 801 to 1,040 square feet. Six are severely undersized and range from 730 to 799 square feet. Thus, only 4 out of 25 classrooms meet the square footage requirements. As a STEAM magnet school, Irving MS attracts students from diverse backgrounds, drawn by its project-based learning in science, math, and technology. However, the inadequacy of the existing classrooms poses a substantial obstacle to delivering an equitable education experience. Not a single classroom in the existing Administration Building meets the minimum square footage standard of 1,300 square feet, which is essential for accommodating specialized learning environments such as science labs. The school would therefore need to continue to rely on portable classrooms to deliver the specialized STEAM instructional programs that the school offers.

Sections 5.6 and 5.7 provide a comparative summary of the alternatives, including a summary of the ability of the alternatives to meet the Project objectives and a summary comparison of the potential impacts associated with the alternatives and the proposed Project.

TABLE 5-1
COMPARISON OF PROJECT ALTERNATIVES

Building ID (DSA Number)	Building Name (Square Footage)	Proposed Project	Alternative 1: No Project Alternative	Alternative 2: Retain Entire Administration Building
Permanent Building Type				
15553 (1710)	Administration Building (53,949)	Historic Contributor and Assembly Bill (AB) 300[1] building (with insufficient seismic gaps, overstressed sheer walls, and diaphragm openings that are too large) would be demolished and replaced with approximately 55,000-square-foot two-story new Administration and Classroom Building that would house 19 classrooms and support spaces, administration offices, library, and other building service spaces. After the Administration Building is demolished, construction staging would occur at this location.	Building would be retained as-is, with 25 classrooms (most of which are undersized), and seismic risk would remain the same—insufficient seismic gaps, overstressed shear walls, and diaphragm openings that are too large. No construction would occur that requires staging.	Building would be retained to reduce impact to historic resources and seismically retrofitted to reduce seismic risk. Construction staging would need to be located elsewhere.
14574 (12798)	Homemaking Building (4,432)	Demolish building	Building would be retained as-is, and seismic risk would remain the same.	Demolish building
15359 (12798)	Classroom Building (4,061)	Demolish building	Building would be retained as-is, and seismic risk would remain the same.	Demolish building
17042 (1699)	Auditorium (14,957)	Historic Contributor and AB 300 building (with insufficient wall anchorage and diagonal sheathing at the diaphragm) would receive seismic retrofit	Building would be retained as-is, and seismic risk would remain the same—insufficient wall anchorage and diagonal sheathing at the diaphragm	Seismic retrofit
14626 (1711)	Physical Education Building (15,776)	Historic Contributor and AB 300 building (with overstressed shear walls and insufficient wall anchorage at the diaphragm) would remain as-is	Building would be retained as-is, and seismic risk would remain the same—overstressed shear walls and insufficient wall anchorage at the diaphragm	Remain as-is
16011 (1938)	Shop No. 1 (3,000)	Historic Contributor building would remain as-is	Remain as-is	Remain as-is
16601 (1939)	Shop No. 2 (2,999)	Historic Contributor building would remain as-is	Remain as-is	Remain as-is
17203 (1937)	Cafeteria (5,231)	Historic Contributor building would remain as-is	Remain as-is	Remain as-is
16254 (no DSA)	Flammable Storage (45)	Remain as-is	Remain as-is	Remain as-is
16880 (12798)	Shop No. 3 (6,541)	AB 300 building would remain as-is (building has already been updated)	Remain as-is	Remain as-is
15567 (48818)	90's Classroom Building (29,084)	Remain as-is	Remain as-is	Remain as-is
41362 (64389)	Elevator Building (413)	Remain as-is	Remain as-is	Remain as-is
28915 (03-104998)	Sanitary Building (864)	Remain as-is	Remain as-is	Remain as-is
Portable Building Type				
16280 (5039)	AA-359 Relocatable Building (Bungalow; 1,852)	Remove building	Building would be retained as-is, and seismic risk would remain the same.	Remove building
16776 (6266)	AA-747 Relocatable Building (Bungalow; 1,912)	Remove building	Building would be retained as-is, and seismic risk would remain the same.	Remove building
16771 (10419)	AA-1243 Relocatable Building (Bungalow; 1,922)	Remove building	Building would be retained as-is, and seismic risk would remain the same.	Remove building
15329 (16338)	J-256 Relocatable Building (Sanitary; 902)	Remove building	Building would be retained as-is, and seismic risk would remain the same.	Remove building
15557 (18474)	AA-1984 Relocatable Building (Bungalow; 2,555)	Remove building	Building would be retained as-is, and seismic risk would remain the same.	Remove building
15389 (32479)	AA-2632 Relocatable Building (Bungalow; 2,774)	Remove building and replace with new 2,400-square-foot permanent modular classroom building for City of Angels	Building would be retained as-is, and seismic risk would remain the same.	Remove building
14933 (no DSA)	S-14 (Service; 255)	Remove building	Building would be retained as-is, and seismic risk would remain the same.	Remove building
24065 (no DSA)	M-476 (Storage; 381)	Remain as-is	Remain as-is	Remain as-is
41376 (no DSA)	Walk-in Freezer (151)	Remain as-is	Remain as-is	Remain as-is
Total Square Footage		**Demolition:** 62,442 **Removal**: 12,172 **New Construction:** 60,000 **Remodel/Seismic Retrofit:** 14,958 **Existing to Remain:** 64,485	**Demolition:** 0 **Removal**: 0 **New Construction:** 0 **Remodel/Seismic Retrofit:** 0 **Existing to Remain:** 154,057	**Demolition:** 8,493 **Removal**: 12,172 **New Construction:** 5,000 **Remodel/Seismic Retrofit:** 68,907 **Existing to Remain:** 64,485

Source: [1] State of California. Amended April 5, 1999. AB 300. http://www.leginfo.ca.gov/pub/99-00/bill/asm/ab_0251-0300/ab_300_bill_19991010_chaptered.html

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5.6 Environmental Analysis of Alternative 1 (No Project/No Build)

The following sections provide an analysis of the No Project/No Build Alternative.

Air Quality

Alternative 1 would not result in any demolition, grading, or building construction. Campus structures as they exist currently would remain and be repaired as needed. Existing conditions would persist, and no new pollutant emissions associated with operation of heavy-duty construction equipment, or haul trucks, would be generated. The Project's less than significant impacts in relation to air quality plans, sensitive receptors, and criteria pollutants would be reduced under the No Project/No Build Alternative. Alternative 1 would result in lesser impacts than the proposed Project.

Cultural Resources

Alternative 1 would not result in any demolition, grading, or building construction. Campus structures as they exist currently would remain and be repaired as needed. Irving MS was given the California Historical Resources Status Code of 3D (appears eligible for NR as a contributor to a NR eligible multi-component resource through survey evaluation) in the 2022 Historic Resource Evaluation Report (HRER) (see **Appendix 1-B**).[1]

The Campus is considered to be a historical resource under CEQA. Figure 1-4 (Historic District Eligibility Determination) in the appended Historic Resource Technical Report (HRTR; **Appendix 5**) shows the Campus and the contributors accounting for its eligibility as a historical resource. Alternative 1 would result in no direct or indirect impact to a historic resource because no demolition or new development would occur.

Greenhouse Gas Emissions

As Alternative 1 would not result in any demolition, grading, or building construction, there would be no impacts compared to existing conditions. Campus structures as they exist currently would remain and be repaired, as needed. No new GHG emissions associated with heavy-duty construction equipment and construction worker and hauling trips would be generated. The proposed Project's less than significant impacts in relation to GHG emissions would be reduced under Alternative 1 since there would be no new construction activity. No new vehicle trips would be generated under Alternative 1. However, impacts in relation to a conflict with an applicable plan, policy, or regulation to reduce GHG emissions would increase under Alternative 1 because this alternative would not include the Project's energy efficiency features that would reduce operational GHG emissions in conformance with CALGreen standards. Overall, under Alternative 1, impacts would be similar to proposed Project.

[1] ASM Affiliates, Inc. 2022. Historic Resource Evaluation Report: Irving Middle School. Prepared for Los Angeles Unified School District, Office of Environmental Health & Safety.

Hazards and Hazardous Materials

Alternative 1 would not result in any demolition, grading, soil remediation, or building construction. Existing conditions would persist; therefore, Alternative 1 would not expose the public to potential hazardous conditions associated with an accidental release of hazardous substances, hazardous building materials, and/or impacted soils. Impacts related to hazardous materials would be less under this alternative compared to the proposed Project.

Noise

Alternative 1 would not result in any demolition, grading, or building construction. Existing conditions would continue, and no changes to ambient noise or groundborne vibration, whether permanent, periodic, or temporary, would occur. In addition, because no construction activity would occur, the construction noise and vibration associated with the proposed Project would not occur. The less than significant noise impacts associated with the proposed Project would not occur under Alternative 1. Therefore, impacts under this alternative would be less than those of the proposed Project.

Pedestrian Safety

Under Alternative 1, existing site conditions would remain unchanged, and there would be no changes to existing external pedestrian safety, such as would occur during construction activity associated with the proposed Project. Therefore, as potential impacts associated with construction traffic would not occur, this alternative would have lesser impacts compared to the proposed Project.

Transportation and Traffic

Under Alternative 1, existing site conditions would remain unchanged, and there would be no changes to existing external transportation and traffic conditions, such as would occur during construction activity associated with the proposed Project. Therefore, as potential impacts associated with construction traffic would not occur, this alternative would have lesser impacts compared to the proposed Project.

Conclusion

As detailed above, with the implementation of Alternative 1, the following impacts associated with the proposed Project would not occur: cultural resources and hazards and hazardous materials.

The implementation of this alternative would result in fewer environmental impacts compared to the proposed Project. However, this alternative would result in greater impacts related to geology and soils (seismic risk) and would not meet any of the Project objectives.

5.7 Environmental Analysis of Alternative 2 (Retain Entire Existing Administration Building)

The following sections provide an analysis for retaining the entire existing Administration Building.

Air Quality

Under Alternative 2, demolition, grading, and building construction would occur. Alternative 2 would result in the demolition of two permanent buildings and construction of two new structures that would result in a smaller construction footprint than the proposed Project. Building upgrades such as seismic retrofit and infrastructure improvements, which were anticipated as part of the proposed Project, would also occur for the existing Administrative Building. Alternative 2 would require less construction activity and, therefore, less regional construction emissions from construction equipment and employee vehicle trips than the proposed Project. Under Alternative 2, sensitive receptors would be exposed to reduced concentrations of toxic air contaminants and respirable particulate matter during construction activities due to reduced construction activity. Operational emission impacts to sensitive receptors under Alternative 2 would decrease due to the smaller construction footprint, which would result in less energy and mobile emissions. Similar to the proposed Project, Alternative 2 would not create objectionable odors.

Cultural Resources

Under Alternative 2, two permanent buildings (Homemaking Building and Classroom Building) that are not historic contributors would still be demolished, and two new buildings (M&O #1 and Modular Classroom Building for City of Angels) would be constructed. The Administration Building and all portable classrooms would remain as-is.

Under Alternative 2, all six PWA-era buildings would remain and would retain their eligibility as contributors to the historic district.

Alternative 2 would result in a less than significant impact to historic resources because all contributors to the historic district would be retained. This less than significant impact would be less than the significant and unavoidable impact that would occur with the proposed Project. Implementation of standard conditions SC-CUL-1 through SC-CUL-11 would still be required under this alternative. The application of these SCs would further reduce the impact.

Greenhouse Gas Emissions

Under Alternative 2, building upgrades, such as seismic retrofit and infrastructure improvements, which were anticipated as part of the proposed Project, would not occur for the existing Administrative Building. Alternative 2 would result in a smaller construction footprint than the proposed Project, although demolition, grading, and building construction would still occur. Compared to existing conditions, development of Alternative 2 would result in less than significant impacts. Therefore, Alternative 2 would require less construction activity and construction GHG emissions from construction equipment and employee vehicle

trips compared to the proposed Project. During operation, no new vehicle trips are expected under Alternative 2. In relation to a conflict with an applicable plan, policy, or regulation to reduce GHG emissions, Alternative 2 would result in reduced impacts compared to the proposed Project, based on the increased remodeling area, thereby reducing energy-based GHG emissions during operation. Under Alternative 2, impacts to GHG emissions would be reduced compared to the proposed Project.

Hazards and Hazardous Materials

Under Alternative 2, a Soil Removal Plan would be prepared to address the removal of the identified UST, associated piping, and surrounding impacted soil as proposed in the Project.

Similar to the proposed Project, Alternative 2 would expose workers to hazardous building materials, such as asbestos containing material (ACM) and lead based paint (LBP) during modernization and seismic upgrades within the existing Campus buildings. Further, Alternative 2 would require the removal of affected soils within the Campus. However, construction work under Alternative 2 would result in less demolition square footage and potentially less soil removal than the proposed Project, therefore reducing the amount of hazardous materials exposure, transport, use, and disposal during construction. As with the proposed Project, Mitigation Measures MM-HAZ-1, MM-HAZ-2, MM-HAZ-3 and MM-HAZ-4 would be developed during preconstruction activities and implemented during construction activities. Impacts associated with the accidental release or exposure to hazardous materials would be less than significant, similar to the proposed Project.

Noise

Under Alternative 2, no demolition, grading, or building construction would occur at the Administration Building; however, similar to the proposed Project, Classroom 1 and the Homemaking Building would be demolished, requiring excavation. The construction equipment that is expected to generate the most noise is an excavator, which can reach 85 A-weighted decibels (dBA) at 50 feet from the equipment. The closest distance between a sensitive receptor and an area that would require excavation is approximately 75 feet between the Homemaking Building and single-family residences located on Marguerite Street. Under both the proposed Project and Alternative 2, use of an excavator would be compliant with SC-N-8 and SC-N-9 requiring site-specific noise control measures to be implemented during construction, and impacts would be less than significant. Under both the proposed Project and Alternative 2, the groundborne vibration experienced from demolition activities at the closest sensitive receptor would be the same and would result in less than significant impacts. Under both the proposed Project and Alternative 2, no increase in operations such as vehicle trips, or use of the Campus for outdoor activities, would occur. Therefore, construction and operational impacts would be similar.

Pedestrian Safety

Under Alternative 2, there would be changes to existing pedestrian safety conditions, such as would occur during construction activity associated with the proposed Project. Impacts under Alternative 2 would be reduced to a less than significant level with the incorporation of SCs, including SC-PED-1 through SC-PED-5, SC-T-3, and SC-T-4, which require contractors to submit a Construction Worksite Traffic Control Plan prior

to construction. However, Alternative 2 impacts would be greater than the proposed Project because construction staging, which is planned for the Administration Building footprint after demolition of the proposed Project, would need to be located elsewhere. This Alternative would need to expand the work area compared to the proposed Project, which would increase the construction impact area that would need to be addressed in the Construction Worksite Traffic Control Plan. Potential locations include the former Moss Avenue cul-de-sac (with encroachment permit from City of Los Angeles), the basketball courts on the Campus, or streets surrounding the school (with permits from the City of Los Angeles). Therefore, while less than significant, this alternative would have greater impacts compared to the proposed Project.

Transportation and Traffic

Under Alternative 2, there would be temporary changes to existing transportation and traffic conditions, such as would occur during construction activity associated with the proposed Project. Impacts under Alternative 2 would be reduced to a less-than-significant level with the incorporation of SCs, including SC-PED-1 through SC-PED-5, SC-T-3, and SC-T-4. Because Alternative 2 construction activity would be limited without removal of the Administration Building, impacts associated with construction traffic would be reduced and would be less than proposed Project. However, impacts related to incompatible uses and emergency access would be greater than the proposed Project under Alternative 2 because construction staging, which is planned for the Administration Building footprint after demolition of the proposed Project, would need to be located elsewhere. This Alternative would need to expand the work area compared to the proposed Project, which would increase the construction impact area that would need to be addressed in the Construction Worksite Traffic Control Plan. Potential locations include the former Moss Avenue cul-de-sac (with encroachment permit from City of Los Angeles), the basketball courts on the Campus, or streets surrounding the school (with permits from the City of Los Angeles). Therefore, while less than significant, this alternative would have greater impacts compared to the proposed Project.

Conclusion

The significant and unavoidable impact to cultural resources associated with development of the proposed Project would not occur under Alternative 2. Implementation of this alternative would result in fewer environmental impacts than the proposed Project; however, this alternative would not meet the majority of the Project objectives.

5.8 Comparative Summary of the Alternatives

Table 5-2, *Alternative Comparison*, presents the significance determinations for each environmental impact discussion for the proposed Project and each alternative, and how impacts of the alternatives compare to the proposed Project. The table provides a means for the reader to review and compare the alternatives to each other, and to the proposed Project. **Table 5-3, *Consistency with Project Objectives***, demonstrates each alternative's consistency with the Project objectives.

TABLE 5-2
ALTERNATIVE COMPARISON

Environmental Issue	Proposed Project	Alternative 1: No Project/ No Build	Alternative 2: Retain Entire Existing Administration Building
Air Quality			
Air Quality Plan	LS	NI (L)	LS (L)
Criteria Pollutant	LS	NI (L)	LS (L)
Sensitive Receptors	LS	NI (L)	LS (L)
Cultural Resources			
Historical Resources	SU	NI (L)	LS (L)
Greenhouse Gas Emissions			
Emissions Generation	LS	NI (L)	LS (L)
GHG Reduction Plan, Policy, or Regulation	LS	NI (L)	LS (L)
Hazards & Hazardous Materials			
Transport, Use, or Disposal of Hazardous Materials	LSM	NI (L)	LSM (E)
Accidental Release of Hazardous Materials	LSM	NI (L)	LSM (E)
Hazardous Emissions Near a School	LSM	NI (L)	LSM (E)
Hazardous Materials Cleanup Site	LSM	NI (L)	LSM (E)
Noise			
Noise Levels in Excess of Standards	LS	NI (L)	LS (E)
Excessive Ground-Borne Vibration	LS	NI (L)	LS (E)
Pedestrian Safety			
Safey Hazards Due to Design Feature or Incompatible Uses	LS	NI (L)	LS (G)
Unsafe Routes to Schools	LS	NI (L)	LS (E)
Adjacency to Major Roadway Safety Hazard	LS	NI (L)	LS (E)
Transportation & Traffic			
Circulation System Program, Plan, Ordinance, or Policy Conflicts	LS	NI (L)	LS (E)
Hazards Due to Geometric Design Feature	LS	NI (L)	LS (G)
Emergency Access	LS	NI (L)	LS (G)
Note: NI = No Impact; LS = Less than Significant; LSM = Less than Significant with Mitigation. (L) = Less than Proposed Project; (G) = Greater than Proposed Project; (E) = Equivalent to Proposed Project.			

TABLE 5-3
CONSISTENCY WITH PROJECT OBJECTIVES

Objective	Proposed Project	Alternative 1: No Project/ No Build	Alternative 2: Retain Entire Existing Administration Building
#1: Buildings meeting AB 300 criteria for seismic evaluation may be addressed, to the extent feasible, with a focus on those determined to have a high seismic vulnerability, through retrofit, removal, or seismic modernization, which will be determined based on an assessment of the seismic vulnerability of the building(s), the historic context of the building/site, actual or potential impact to the learning environment, site layout, and the approach that best ensures compliance with Division of the State Architect (DSA) requirements.	The proposed Project would retrofit or replace two buildings meeting AB 300 criteria for seismic evaluation: Administration Building and Auditorium.	**Inconsistent:** Seismic vulnerability of the Administration Building and Auditorium would not be addressed.	**Inconsistent:** This alternative would be less consistent with Section CAC 4-317(c) of the California Building Code than the proposed Project, which indicates that no school building shall be constructed, rehabilitated (i.e., seismic retrofit), reconstructed, or relocated within 50 feet of the trace of an active fault. The Administration Building retrofit would be very expensive and still located within 50 feet of the trace of an active fault.
#2: The buildings, grounds, and site infrastructure that have significant/severe physical conditions that already do or are highly likely in the near future to pose a health and safety risk, or negatively impact a school's ability to deliver the instructional program and/or operate may be addressed by repair or replacement.	The proposed Project would reduce health and safety risks with building replacement and retrofit.	**Inconsistent:** Seismic vulnerability of the Administration Building, Auditorium, and other existing classrooms within 50 feet of the trace of an active fault would not be addressed.	**Consistent:** Seismic vulnerability of the Administration Building, Auditorium, and other existing classrooms within 50 feet of the trace of an active fault would be addressed.
#3: The District reliance on relocatable buildings, especially for K–12 instruction, should be reduced.	The proposed Project would replace 11 relocatable buildings with permanent classroom buildings.	**Inconsistent:** Five existing relocatable buildings for K–12 instruction would be retained.	**Consistent:** Five relocatable buildings would be replaced with retrofitted Administration Building classrooms.
#4: Necessary and prioritized upgrades must be made throughout the school site in order to comply with the program accessibility requirements of the Americans with Disabilities Act (ADA) Title II Regulations, and the District's Self-Evaluation and Transition Plan under Title II of the ADA.	The proposed Project would include necessary ADA upgrades.	**Inconsistent:** No ADA upgrades would be made.	**Consistent:** ADA upgrades would be made.
#5: The exterior conditions of the school site will be enhanced around new buildings and/or areas impacted by construction to improve the visual appearance including landscape and hardscape.	The proposed Project would include landscape and hardscape enhancements.	**Inconsistent:** No enhancement of exterior conditions of the school site to improve the visual appearance of the landscape and hardscape would be made.	**Consistent:** Landscape and hardscape enhancements would be made.
#6: Outdoor learning environments will be developed where the site layout and project planning provide the opportunity.	The proposed project would provide additional outdoor learning and gathering spaces for its students.	**Inconsistent:** No outdoor learning environments would be developed.	**Consistent:** Outdoor learning environments would be developed.

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5.10 Environmentally Superior Alternative

An EIR must identify the environmentally superior alternative. The No Project/No Build Alternative (Alternative 1) would reduce, or eliminate, all proposed Project impacts. However, Alternative 1 does not meet any of the Project objectives. In addition, CEQA Guidelines Section 15126.6(c) requires that, if the environmentally superior alternative is the No Project Alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives.

As such, Alternative 2 would be the environmentally superior alternative as it would result in the greatest reduction in air quality, cultural resources, and greenhouse gas emissions impacts, compared to the proposed Project. Under Alternative 2, cultural resources impacts would be reduced to a less than significant level, but the alternative would be inconsistent with Objective #1, which would not be entirely met (see Table 5-3). The intent of the objectives is to increase safety for staff and students by providing upgraded buildings and to reduce the reliance on portable buildings. Further, the objectives aim to provide larger classroom spaces that could accommodate modern and efficient technology, which would not be entirely met with Alternative 2. Therefore, this alternative would meet some of the objectives but not to the same degree as the proposed Project.

CHAPTER 6
Report Preparation

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