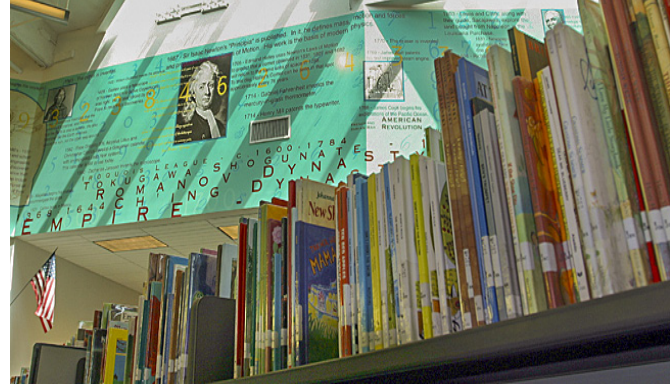


September 2015 | **Final Environmental Impact Report**



SCHOOL UPGRADE PROGRAM

Los Angeles Unified School District

September 2015 | **Final Environmental Impact Report**
State Clearinghouse No. 2013111046

SCHOOL UPGRADE PROGRAM EIR

Los Angeles Unified School District

Prepared for:

Los Angeles Unified School District

Contact: Gwenn Godek, Senior Planning Advisor
333 South Beaudry Avenue, 28th Floor
Los Angeles, California 90017
213. 241.6253

Prepared by:

PlaceWorks

Contact: Alice Houseworth, AICP, LEED AP, Senior Associate
3 MacArthur Place, Suite 1100
Santa Ana, California 92707
714.966.9220
info@placeworks.com
www.placeworks.com



Table of Contents

Contents	Page
1. EXECUTIVE SUMMARY	1-1
1.1 INTRODUCTION	1-1
1.2 ENVIRONMENTAL PROCEDURES	1-2
1.2.1 EIR Format	1-2
1.2.2 Type and Purpose of This EIR	1-4
1.3 SUP LOCATION	1-5
1.4 SUP COMPONENT SUMMARY	1-6
1.4.1 Type 1. New Construction on New Property	1-6
1.4.2 Type 2. New Construction on Existing Campus	1-6
1.4.3 Type 3. Modernization, Repair, Replacement, Upgrade, Remodel, Renovation, and Installation	1-11
1.4.4 Type 4. Operational and Other Campus Changes	1-12
1.5 PROJECT ALTERNATIVES	1-12
1.5.1 No Project Alternative	1-12
1.5.2 Reduced SUP Alternative	1-13
1.6 ISSUES TO BE RESOLVED	1-14
1.7 AREAS OF CONTROVERSY	1-14
1.8 SUMMARY OF ENVIRONMENTAL IMPACTS	1-15
2. INTRODUCTION	2-1
2.1 PURPOSE OF THE ENVIRONMENTAL IMPACT REPORT	2-1
2.2 NOTICE OF PREPARATION	2-2
2.3 SCOPE OF THIS EIR	2-3
2.4 SUMMARY OF ENVIRONMENTAL IMPACTS	2-4
2.4.1 Impacts Considered Less Than Significant	2-4
2.4.2 Impacts Considered Potentially Significant and Unavoidable	2-4
2.5 FINAL EIR CERTIFICATION AND PROJECT CONSIDERATION	2-5
3. ENVIRONMENTAL SETTING	3-1
3.1 INTRODUCTION	3-1
3.2 REGIONAL ENVIRONMENTAL SETTING	3-1
3.2.1 Regional Location	3-1
3.3 LOCAL ENVIRONMENTAL SETTING	3-1
3.3.1 Project Location	3-1
3.3.2 LAUSD Schools	3-8
3.3.3 General Plan and Zoning	3-15
3.4 ASSUMPTIONS REGARDING CUMULATIVE IMPACTS	3-15
4. PROGRAM DESCRIPTION	4-1
4.1 LOCATION	4-1
4.2 BACKGROUND	4-1
4.2.1 Facilities Services Division	4-5
4.3 SUP STATEMENT OF OBJECTIVES	4-7
4.4 SUP COMPONENTS	4-8
4.4.1 New School Construction Program	4-13
4.4.2 Repair and Modernization Program	4-17
4.4.3 Joint Use/Innovation Fund and Charter Facilities Program	4-19
4.4.4 Capital Improvement Program	4-22
4.5 TYPICAL SUP PROJECT CATEGORIES	4-24
4.5.1 Type 1. New Construction on New Property	4-25
4.5.2 Type 2. New Construction on Existing Campus	4-25

Table of Contents

Contents	Page
4.5.3	Type 3. Modernization, Repair, Replacement, Upgrade, Remodel, Renovation, and Installation 4-25
4.5.4	Type 4. Operational and Other Campus Changes..... 4-26
4.6	LAUSD STANDARD CONDITIONS 4-28
4.7	ZONING OVERRIDE 4-59
4.8	CEQA COMPLIANCE 4-59
4.8.1	Projects Found to Be Categorically Exempt 4-69
4.8.2	Exceptions to Exemptions 4-71
4.9	INTENDED USES OF THIS PROGRAM EIR 4-72
4.9.1	Anticipated Agency Actions..... 4-73
5.	ENVIRONMENTAL ANALYSIS 5-1
5.1	AESTHETICS 5.1-1
5.1.1	Environmental Setting..... 5.1-2
5.1.2	Thresholds of Significance..... 5.1-13
5.1.3	Environmental Impacts..... 5.1-13
5.1.4	Applicable Regulations and Standard Conditions 5.1-16
5.1.5	Level of Significance Before Mitigation 5.1-17
5.1.6	Mitigation Measures..... 5.1-17
5.1.7	Level of Significance After Mitigation 5.1-17
5.2	AGRICULTURE AND FORESTRY RESOURCES 5.2-1
5.2.1	Environmental Setting..... 5.2-2
5.2.2	Thresholds of Significance..... 5.2-9
5.2.3	Environmental Impacts..... 5.2-10
5.2.4	Applicable Regulations and Standard Conditions 5.2-13
5.2.5	Level of Significance Before Mitigation 5.2-13
5.2.6	Mitigation Measures..... 5.2-13
5.2.7	Level of Significance After Mitigation 5.2-14
5.3	AIR QUALITY 5.3-1
5.3.1	Environmental Setting..... 5.3-1
5.3.2	Thresholds of Significance..... 5.3-23
5.3.3	Environmental Impacts..... 5.3-26
5.3.4	Applicable Regulations and Standard Conditions 5.3-33
5.3.5	Level of Significance Before Mitigation 5.3-34
5.3.6	Mitigation Measures..... 5.3-34
5.3.7	Level of Significance After Mitigation 5.3-35
5.4	BIOLOGICAL RESOURCES 5.4-1
5.4.1	Environmental Setting..... 5.4-2
5.4.2	Thresholds of Significance..... 5.4-40
5.4.3	Environmental Impacts..... 5.4-41
5.4.4	Applicable Regulations and Standard Conditions 5.4-44
5.4.5	Level of Significance Before Mitigation 5.4-45
5.4.6	Mitigation Measures..... 5.4-45
5.4.7	Level of Significance After Mitigation 5.4-45
5.5	CULTURAL RESOURCES 5.5-1
5.5.1	Environmental Setting..... 5.5-2
5.5.2	Thresholds of Significance..... 5.5-30
5.5.3	Environmental Impacts..... 5.5-31
5.5.4	Applicable Regulations and Standard Conditions 5.5-35
5.5.5	Level of Significance Before Mitigation 5.5-36
5.5.6	Mitigation Measures..... 5.5-36
5.5.7	Level of Significance After Mitigation 5.5-36

Table of Contents

Contents	Page
5.6	GEOLOGY AND SOILS.....5.6-1
5.6.1	Environmental Setting.....5.6-4
5.6.2	Thresholds of Significance..... 5.6-25
5.6.3	Environmental Impacts..... 5.6-25
5.6.4	Applicable Regulations and Standard Conditions 5.6-33
5.6.5	Level of Significance Before Mitigation 5.6-33
5.6.6	Mitigation Measures..... 5.6-33
5.6.7	Level of Significance After Mitigation 5.6-33
5.7	GREENHOUSE GAS EMISSIONS.....5.7-1
5.7.1	Environmental Setting.....5.7-3
5.7.2	Thresholds of Significance..... 5.7-13
5.7.3	Environmental Impacts..... 5.7-15
5.7.4	Applicable Regulations and Standard Conditions 5.7-18
5.7.5	Level of Significance Before Mitigation 5.7-19
5.7.6	Mitigation Measures..... 5.7-19
5.7.7	Level of Significance After Mitigation 5.7-19
5.8	HAZARDS AND HAZARDOUS MATERIALS.....5.8-1
5.8.1	Environmental Setting.....5.8-2
5.8.2	Thresholds of Significance..... 5.8-31
5.8.3	Environmental Impacts..... 5.8-32
5.8.4	Applicable Regulations and Standard Conditions 5.8-51
5.8.5	Level of Significance Before Mitigation 5.8-55
5.8.6	Mitigation Measures..... 5.8-55
5.8.7	Level of Significance After Mitigation 5.8-55
5.9	HYDROLOGY AND WATER QUALITY5.9-1
5.9.1	Environmental Setting.....5.9-2
5.9.2	Thresholds of Significance..... 5.9-23
5.9.3	Environmental Impacts..... 5.9-24
5.9.4	Applicable Regulations and Standard Conditions 5.9-31
5.9.5	Level of Significance Before Mitigation 5.9-32
5.9.6	Mitigation Measures..... 5.9-32
5.9.7	Level of Significance After Mitigation 5.9-32
5.10	LAND USE AND PLANNING 5.10-1
5.10.1	Environmental Setting..... 5.10-1
5.10.2	Thresholds of Significance..... 5.10-10
5.10.3	Environmental Impacts..... 5.10-10
5.10.4	Applicable Regulations and Standard Conditions 5.10-13
5.10.5	Level of Significance Before Mitigation 5.10-13
5.10.6	Mitigation Measures..... 5.10-13
5.10.7	Level of Significance After Mitigation 5.10-13
5.11	MINERAL RESOURCES..... 5.11-1
5.11.1	Environmental Setting..... 5.11-3
5.11.2	Thresholds of Significance..... 5.11-9
5.11.3	Environmental Impacts..... 5.11-9
5.11.4	Applicable Regulations and Standard Conditions 5.11-9
5.11.5	Level of Significance Before Mitigation 5.11-9
5.11.6	Mitigation Measures..... 5.11-9
5.11.7	Level of Significance After Mitigation 5.11-10
5.12	NOISE..... 5.12-1
5.12.1	Environmental Setting..... 5.12-5
5.12.2	Thresholds of Significance..... 5.12-22

Table of Contents

Contents	Page
5.12.3 Environmental Impacts.....	5.12-24
5.12.4 Applicable Regulations and Standard Conditions	5.12-36
5.12.5 Level of Significance Before Mitigation	5.12-36
5.12.6 Mitigation Measures.....	5.12-37
5.12.7 Level of Significance After Mitigation	5.12-37
5.13 PEDESTRIAN SAFETY	5.13-1
5.13.1 Environmental Setting.....	5.13-1
5.13.2 Thresholds of Significance.....	5.13-9
5.13.3 Environmental Impacts.....	5.13-9
5.13.4 Applicable Regulations and Standard Conditions	5.13-11
5.13.5 Level of Significance Before Mitigation	5.13-11
5.13.6 Mitigation Measures.....	5.13-12
5.13.7 Level of Significance After Mitigation	5.13-12
5.14 POPULATION AND HOUSING	5.14-1
5.14.1 Environmental Setting.....	5.14-1
5.14.2 Thresholds of Significance.....	5.14-7
5.14.3 Environmental Impacts.....	5.14-8
5.14.4 Applicable Regulations and Standard Conditions	5.14-9
5.14.5 Level of Significance Before Mitigation	5.14-9
5.14.6 Mitigation Measures.....	5.14-9
5.14.7 Level of Significance After Mitigation	5.14-9
5.15 PUBLIC SERVICES.....	5.15-1
5.15.1 Fire Protection and Emergency Services.....	5.15-1
5.15.2 Police Protection Services.....	5.15-5
5.15.3 School Services	5.15-10
5.15.4 Library Services	5.15-10
5.16 RECREATION	5.16-1
5.16.1 Environmental Setting.....	5.16-1
5.16.2 Thresholds of Significance.....	5.16-5
5.16.3 Environmental Impacts.....	5.16-6
5.16.4 Applicable Regulations and Standard Conditions	5.16-6
5.16.5 Level of Significance Before Mitigation	5.16-6
5.16.6 Mitigation Measures.....	5.16-7
5.16.7 Level of Significance After Mitigation	5.16-7
5.17 TRANSPORTATION AND TRAFFIC	5.17-1
5.17.1 Environmental Setting.....	5.17-2
5.17.2 Thresholds of Significance.....	5.17-8
5.17.3 Environmental Impacts.....	5.17-9
5.17.4 Applicable Regulations and Standard Conditions	5.17-15
5.17.5 Level of Significance Before Mitigation	5.17-15
5.17.6 Mitigation Measures.....	5.17-15
5.17.7 Level of Significance After Mitigation	5.17-16
5.18 UTILITIES AND SERVICE SYSTEMS	5.18-1
5.18.1 Environmental Setting.....	5.18-2
5.18.2 Thresholds of Significance.....	5.18-21
5.18.3 Environmental Impacts.....	5.18-22
5.18.4 Applicable Regulations and Standard Conditions	5.18-25
5.18.5 Level of Significance Before Mitigation	5.18-25
5.18.6 Mitigation Measures.....	5.18-25
5.18.7 Level of Significance After Mitigation	5.18-25
6. SIGNIFICANT UNAVOIDABLE ADVERSE IMPACTS	6-1

Table of Contents

Contents	Page
6.1 AIR QUALITY	6-1
6.2 CULTURAL RESOURCES	6-1
6.3 NOISE	6-2
6.4 TRANSPORTATION AND TRAFFIC	6-2
7. ALTERNATIVES TO THE SUP	7-1
7.1 INTRODUCTION.....	7-1
7.1.1 Purpose and Scope.....	7-1
7.1.2 Typical SUP Project Categories	7-2
7.1.3 Project Objectives	7-2
7.2 POTENTIALLY SIGNIFICANT IMPACTS OF THE SUP.....	7-3
7.2.1 Air Quality.....	7-3
7.2.2 Cultural Resources.....	7-3
7.2.3 Noise.....	7-3
7.2.4 Transportation and Traffic	7-3
7.3 ALTERNATIVES CONSIDERED AND REJECTED DURING THE PLANNING PROCESS.....	7-4
7.3.1 Alternative Development Areas	7-4
7.4 ALTERNATIVES SELECTED FOR FURTHER ANALYSIS	7-4
7.4.1 No Project Alternative.....	7-5
7.4.2 Air Quality.....	7-6
7.4.3 Cultural Resources.....	7-6
7.4.4 Noise.....	7-6
7.4.5 Transportation and Traffic	7-7
7.4.6 Conclusion.....	7-7
7.5 REDUCED SUP ALTERNATIVE	7-7
7.5.1 Air Quality.....	7-8
7.5.2 Cultural Resources.....	7-8
7.5.3 Noise.....	7-8
7.5.4 Transportation and Traffic	7-9
7.5.5 Conclusion.....	7-9
7.6 ENVIRONMENTALLY SUPERIOR ALTERNATIVE	7-9
8. SIGNIFICANT IRREVERSIBLE CHANGES	8-1
9. GROWTH-INDUCING IMPACTS.....	9-1
10. DRAFT EIR COMMENTS AND RESPONSES.....	10-1
10.1 CEQA REQUIREMENTS REGARDING COMMENTS AND RESPONSES.....	10-1
10.2 COMMENTS AND RESPONSES	10-2
11. PERSONS PREPARING EIR	11-1

Table of Contents

Contents	Page
----------	------

APPENDICES

Appendix A. CEQA Notices

- A-1 Notice of Preparation
- A-2 Notice of Preparation Comment Letters
- A-3 Notice of Availability of Draft EIR
- A-4 Notice of Availability of Draft EIR-Extended Public Review

Appendix B. Cultural Resource

- B-1 Historic Resource Context Statement 2014
- B-2 Historic Schools Design Guidelines 2015
- B-3 Historic Resource Exemptions 2005
- B-4 Historic Resource CEQA Flowchart 2015

Appendix C. Student Population Forecast

Appendix D. Environmental Analysis

- D-1 Environmental Analysis
- D-2 CEQA Procedures 2003
- D-3 Initial Study Checklist

Appendix E. CEQA Infill Streamlining

Appendix FE. LAUSD Standard Conditions of Approval

~~Appendix A. CEQA Notices~~

- ~~— Notice of Preparation~~
- ~~— Notice of Preparation Comment Letters~~
- ~~— Notice of Availability of Draft EIR~~
- ~~— Notice of Availability of Draft EIR-Extended Public Review~~

~~Appendix B. Cultural Resource~~

- ~~— B-1 Historic Resource Context Statement 2014~~
- ~~— B-2 Historic Schools Design Guidelines 2015~~
- ~~— B-3 Historic Resource Exemptions 2005~~
- ~~— B-4 Historic Resource CEQA Flowchart 2015~~

~~Appendix C. Student Population Forecast~~

Table of Contents

Figure		Page
Figure ES-1	Regional Location.....	1-7
Figure ES-2	Local Vicinity.....	1-9
Figure 3-1	Regional Location.....	3-4
Figure 3-2	Local Vicinity.....	3-6
Figure 5.2-1	Mapped Farmland	5.2-7
Figure 5.4-1	Significant Ecological Areas.....	5.4-19
Figure 5.6-1	Fault Map.....	5.6-19
Figure 5.6-2	Liquefaction Zones	5.6-21
Figure 5.6-3	Landslide Zones.....	5.6-23
Figure 5.8-1	Fire Hazard Severity Zones	5.8-29
Figure 5.9-1	Watersheds.....	5.9-15
Figure 5.9-2	Groundwater Basins.....	5.9-17
Figure 5.9-3	Flood Zones	5.9-21
Figure 5.11-1	Mineral Zones	5.11-7
Figure 5.12-1	Airport Noise	5.12-34

Table of Contents

Table	Page
Table 1-1	Summary of Environmental Impacts, Mitigation Measures, and Level of Significance After Mitigation 1-17
Table 2-1	NOP Comment Summary2-3
Table 3-1	Cities and County Areas in LAUSD Local Districts3-2
Table 3-1	Number of Schools in Each City3-8
Table 3-2	LAUSD Schools Summary3-9
Table 3-3	Continuation High Schools by Local District..... 3-12
Table 3-4	Community Day Schools..... 3-13
Table 4-1	LAUSD Standard Conditions of Approval..... 4-29
Table 4-2	Environmental Compliance for SUP-Related Projects 4-60
Table 4-3	CEQA and OEHS Exceptions 4-71
Table 4-4	Anticipated Agency Actions 4-73
Table 5.1-1	Selected Scenic Highways and Corridors..... 5.1-3
Table 5.1-2	Select Scenic Vistas and Aesthetic Features 5.1-11
Table 5.3-1	Ambient Air Quality Standards for Criteria Pollutants 5.3-5
Table 5.3-2	Attainment Status of Criteria Pollutants in the South Coast Air Basin..... 5.3-17
Table 5.3-3	Ambient Air Quality Monitoring Summary (Northwest and Northeast Local Districts) 5.3-18
Table 5.3-4	Ambient Air Quality Monitoring Summary (South Local District) 5.3-19
Table 5.3-5	Ambient Air Quality Monitoring Summary (Central and East Local District) 5.3-21
Table 5.3-6	Ambient Air Quality Monitoring Summary (West Local District)..... 5.3-22
Table 5.3-7	SCAQMD Regional Significance Thresholds 5.3-24
Table 5.3-8	SCAQMD LSTs..... 5.3-25
Table 5.3-9	SCAQMD Toxic Air Contaminants Risk Thresholds..... 5.3-25
Table 5.3-10	Operational Phase Emissions of a Typical LAUSD School 5.3-28
Table 5.4-1	Significant Ecological Areas Wholly or Partly in District..... 5.4-12
Table 5.4-2	Sensitive Plant Species: Listing Status and Habitat Preference..... 5.4-22
Table 5.4-3	Sensitive Animal Species: Listing Status and Habitat Preference..... 5.4-28
Table 5.4-4	Sensitive Animal Species That Could Occur on LAUSD Campuses 5.4-36
Table 5.4-5	Sensitive Natural Communities In and Near the District..... 5.4-37
Table 5.5-1	Chronology for the Los Angeles Area and LAUSD..... 5.5-19
Table 5.5-2	2004 Schools Identified as Historically Significant 5.5-27
Table 5.6-1	Estimated Relationship between Peak Ground Acceleration and Intensity..... 5.6-2
Table 5.6-2	Selected Historic Earthquakes..... 5.6-17
Table 5.7-1	GHG and Their Relative Global Warming Potential Compared to CO ₂ 5.7-3
Table 5.7-2	Scoping Plan GHG Reduction Measures and 2020 State Target..... 5.7-7
Table 5.7-3	Summary of Global Climate Change Risks to California 5.7-13

Table of Contents

Table	Page
Table 5.7-4	GHG Emissions of an LAUSD School..... 5.7-16
Table 5.8-1	EnviroStor Cleanup Program Sites..... 5.8-22
Table 5.8-2	GeoTracker Sites 5.8-23
Table 5.8-3	RCRAInfo Hazardous Waste Generators 5.8-24
Table 5.8-4	Modernization Projects Not Requiring OEHS Notification or Review 5.8-41
Table 5.10-1	City of Los Angeles Community Plan Areas by LAUSD Local District 5.10-7
Table 5.10-2	SUP Consistency with Regional Transportation Plan/Sustainable Communities Strategy Goals..... 5.10-11
Table 5.11-1	District 11 Mineral Production 5.11-4
Table 5.11-2	Los Angeles County Aggregate Supply and Demand..... 5.11-4
Table 5.11-3	San Gabriel Valley Aggregate Supply and Demand..... 5.11-5
Table 5.12-1	Change in Apparent Loudness 5.12-2
Table 5.12-2	Human Reaction to Typical Vibration Levels 5.12-4
Table 5.12-3	Groundborne Vibration Criteria: Human Annoyance..... 5.12-7
Table 5.12-4	Groundborne Vibration Criteria: Architectural Damage..... 5.12-7
Table 5.12-5	Community Noise and Land Use Compatibility..... 5.12-8
Table 5.12-6	County of Los Angeles Exterior Noise Standards..... 5.12-9
Table 5.12-7	County of Los Angeles Mobile Construction Equipment Noise Limits 5.12-10
Table 5.12-8	County of Los Angeles Stationary Construction Equipment Noise Limits 5.12-10
Table 5.12-9	ALUP Land Use Compatibility..... 5.12-11
Table 5.12-10	City of Los Angeles Ambient Noise Criteria 5.12-13
Table 5.12-11	Typical Noise Levels 5.12-20
Table 5.12-12	Construction Equipment Vibration Levels 5.12-27
Table 5.12-13	Construction Equipment Noise Levels 5.12-30
Table 5.14-1	Population Projections, 2020 and 2035 5.14-4
Table 5.14-2	Projected District Student Population by Grade Level..... 5.14-5
Table 5.14-3	Housing Units and Households within District, 2010 US Census..... 5.14-5
Table 5.14-4	Households Projections, 2020 and 2035 5.14-6
Table 5.14-5	Employment Projections, 2020 and 2035 5.14-7
Table 5.15-1	Fire Protection by Jurisdiction 5.15-3
Table 5.15-2	Police Protection by Jurisdiction..... 5.15-7
Table 5.16-1	Civic Center Organizations and Uses..... 5.16-2
Table 5.17-1	Volume/Capacity and Corresponding Level of Service 5.17-1
Table 5.17-2	LADOT Intersection Significance Thresholds 5.17-4
Table 5.17-3	Travel Modes by Students Aged 5 to 15..... 5.17-8
Table 5.18-1	Water Providers 5.18-6
Table 5.18-2	Forecast Water Supplies and Demands, Los Angeles Department of Water and

Table of Contents

Table	Page
	Power..... 5.18-9
Table 5.18-3	Forecast Water Supplies and Demands, Central Basin Municipal Water District..... 5.18-10
Table 5.18-4	Forecast Water Supplies and Demands, West Basin Municipal Water District..... 5.18-10
Table 5.18-5	Groundwater Basins Management and Safe Yields..... 5.18-12
Table 5.18-6	Water Treatment Facilities, Los Angeles Department of Water and Power..... 5.18-13
Table 5.18-7	Sewer Service Providers..... 5.18-14
Table 5.18-8	Solid Waste Collection by Jurisdiction..... 5.18-18
Table 5.18-9	Landfills Used by Los Angeles Regional Authority..... 5.18-19

Abbreviations and Acronyms

AAQS	ambient air quality standards
AB	Assembly Bill
ACCM	asbestos-containing construction materials
ACM	asbestos-containing materials
af	acre-foot
afy	acre-feet per year
AHERA	Asbestos Hazard Emergency Response Act
ALUC	airport land use commission
ALUP	airport land use plan
ANF	Angeles National Forest
ANSI	American National Standards Institute
AQMP	air quality management plan
ASHA	American Speech-Language-Hearing Association
ASTM	American Society for Testing and Materials
ATU	Asbestos Technical Unit
AVAQMD	Antelope Valley Air Quality Management District
BAU	business as usual
BMP	best management practices
CAA	Clean Air Act
Cal/EPA	California Environmental Protection Agency
Cal/OSHA	California Occupational Safety and Health Administration
CalARP	California Accidental Release Prevention Program
CalEMA	California Emergency Management Agency
CALGreen	California Green Building Code
Caltrans	California Department of Transportation
CARB	California Air Resources Board
CAT	Climate Action Team
CBC	California Building Code
CBMWD	Central Basin Municipal Water District
CCAA	California Clean Air Act
CCC	California Coastal Commission
CCR	California Code of Regulations
CDE	California Department of Education

Abbreviations and Acronyms

CDFW	California Department of Fish and Wildlife
CDP	Coastal Development Permit
CEQA	California Environmental Quality Act
CERCLA	Comprehensive Environmental Response, Compensation and Liability Act
CESA	California Endangered Species Act
CFC	California Fire Code
CGS	California Geological Survey
CHPS	Collaborative for High Performance Schools
CIFF	California Important Farmland Finder
CLAPL	County of Los Angeles Public Library
CMP	Los Angeles County Congestion Management Program
CNA	capital needs assessment
CNDDDB	California Natural Diversity Database
CNEL	community noise equivalent level
CNPS	California Native Plant Society
CO	carbon monoxide
CO ₂ e	carbon dioxide equivalent
Corps	United States Army Corps of Engineers
CPUC	California Public Utilities Commission
CRA	Colorado River Aqueduct
CUPA	certified Unified Program agency
CWA	Clean Water Act
DLRP	Division of Land Resource Protection
DOT	Department of Transportation (federal)
DPM	diesel particulate matter
DSA	Division of the State Architect (under the California Department of General Services)
DTSC	Department of Toxic Substances Control
EEC	early education center
EMD	Emergency Management Department (Los Angeles)
EOC	emergency operations center
EPA	Environmental Protection Agency (US)
EPCRA	Emergency Planning and Community Right-to-Know Act
ESC	educational service center

Abbreviations and Acronyms

FAA	Federal Aviation Administration
FDK	full-day kindergarten
FEMA	Federal Emergency Management Agency
FESA	Federal Endangered Species Act
FHWA	Federal Highway Administration
FIRM	flood insurance rate map
FMMP	Farmland Mapping and Monitoring Program
FMP	facilities mitigation plan
FSD	Facilities Services Division (LAUSD)
GHG	greenhouse gases
GWh	gigawatt hours
GWP	global warming potential
H&SC	California Health and Safety Code
HCM	Highway Capacity Manual
HCP	habitat conservation plan
HOV	high occupancy vehicle
HPOZ	Historic Preservation Overlay Zone
HRA	health risk assessment
ICU	Intersection Capacity Utilization
IPCC	Intergovernmental Panel on Climate Change
LACFCD	Los Angeles County Flood Control District
LADOT	City of Los Angeles Department of Transportation
LADWP	City of Los Angeles Department of Water and Power
LAPD	City of Los Angeles Police Department
LAPL	Los Angeles Public Library
LARA	Los Angeles Regional Agency
LASD	Los Angeles County Sheriff's Department
LASPD	Los Angeles School Police Department
LAUSD	Los Angeles Unified School District
LCFS	low-carbon fuel standard
LCP	Local Coastal Plan
LEED	Leadership in Energy and Environmental Design
LEPC	local emergency planning committee

Abbreviations and Acronyms

LESA	land evaluation and site assessment
LOS	level of service
LST	localized significance thresholds
MBTA	Migratory Bird Treaty Act
MEP	maximum extent practicable
Metro	Los Angeles County Metropolitan Transportation Authority
mgd	million gallons per day
MMT	million metric tons
MMTCO _{2e}	Million metric tons of CO _{2e}
MPAH	Master Plan of Arterial Highways
MPO	metropolitan planning organization
MT	metric ton
MTCO _{2e}	Metric ton of CO _{2e}
MPO	metropolitan planning organization
MRZ	mineral recovery zone
MUTCD	California Manual on Uniform Traffic Control Devices
MW	megawatts
MWD	Metropolitan Water District of Southern California
mybp	million years before present
NAGPRA	Native American Graves Protection and Repatriation Act
NAHC	Native American Heritage Commission
NCCP/HCP	natural communities conservation plan/habitat conservation plan
NFIP	National Flood Insurance Program
NHPA	National Habitat Preservation Authority
NPDES	National Pollutant Discharge Elimination System
NSWD	non-storm water discharges
OEHS	Office of Environmental Health and Safety
OEM	Los Angeles County Office of Emergency Management
OES	California Office of Emergency Services
OHP	Office of Historic Preservation
OPSC	California Office of Public School Construction
P-C	Production-Consumption
PCB	polychlorinated biphenyl

Abbreviations and Acronyms

PDF	project design features
POTW	publicly owned treatment works
ppm	parts per million
PRC	Public Resources Code
PSHA	pipeline safety hazard assessment
PTA	Parent-Teacher Association
RCRA	Resource Conservation and Recovery Act
RPS	renewable portfolio standard
RTP	regional transportation plan
RWQCB	regional water quality control board
SAB	State Allocation Board
SARA	Superfund Amendments and Reauthorization Act
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SCE	Southern California Edison
SCGC	Southern California Gas Company
SCLC	Southern California Library Cooperative
SCS	sustainable communities strategy
SEA	significant ecological area
SEP	Strategic Execution Plan
SERC	State Emergency Response Commission
SFPD	CDE School Facilities Planning Division
SHPO	State Historic Preservation Officer
SHRC	State Historical Resources Commission
SIP	State Implementation Plan
SMARA	Surface Mining and Reclamation Act
SMMNRA	Santa Monica Mountains National Recreation Area
SoCAB	South Coast Air Basin
SRTS	Safe Routes to School
SSO	school safety officer
SSP	Safe School Plans
SUP	School Upgrade Program
SWP	State Water Project

Abbreviations and Acronyms

SWPPP	stormwater pollution prevention plan
SWRCB	State Water Resources Control Board
TAC	toxic air contaminants
TIA	traffic impact analysis
TIP	Transportation Improvement Program
TMDL	total maximum daily load
TRI	toxic release inventory
USFWS	United States Fish and Wildlife Service
UST	underground storage tank
UWMP	urban water management plan
V/C	volume-to-capacity ratio
VMT	vehicle miles traveled
VOC	volatile organic compounds
WBMWD	West Basin Municipal Water District
WCI	Western Climate Initiative
WRD	Water Replenishment District of Southern California
WSAP	water supply allocation plan

1. Executive Summary

1.1 INTRODUCTION

This Final Environmental Impact Report (Final EIR) has been prepared in accordance with the California Environmental Quality Act (CEQA) as amended (Public Resources Code [PRC] Section 21000 et seq.) and the State CEQA Guidelines (California Code of Regulations [CCR] Title 14, Section 15000 et seq.) and the LAUSD CEQA procedures. This document consists of:¹

- (a) A revision of the draft environmental impact report (Draft EIR);
- (b) Verbatim comments and recommendations received on the Draft EIR;
- (c) A list of persons, organizations, and public agencies that commented on the Draft EIR;
- (d) The responses to significant environmental points raised in the review and consultation process; and
- (e) Any other information added by the lead agency.

All Draft EIR comments and responses to comments are in Chapter 10.

~~This This EIR Program Environmental Impact Report (EIR) addresses the environmental effects associated with the implementation of the Los Angeles Unified School District's (LAUSD) School Upgrade Program (School Upgrade Program (SUP)) (see Section 1.4 below). The California Environmental Quality Act (CEQA) requires that local government agencies, prior to taking action on projects over which they have discretionary approval authority, consider the environmental consequences of such projects. An EIR is a public document designed to provide the public and local and state governmental agency decision makers with an analysis of potential environmental consequences to support informed decision making. This document considers and incorporates appropriate information from 5 agency comment letters received during the NOP comment period (November 18, 2013, to December 18, 2013) and 6 agency comment letters received during the NOA-Draft EIR comment period (June 24, 2014 to August 8, 2014) and comment period extension (August 8, 2014 to September 30, 2014) (see Appendix A). focuses on those impacts determined to be potentially significant as discussed in the Notice of Preparation completed for this project (see Appendix A).~~

~~This EIR has been prepared pursuant to the requirements of CEQA, the CEQA Guidelines, and the LAUSD CEQA procedures. The LAUSD, as the lead agency, has reviewed and revised as necessary all submitted drafts to reflect its own independent judgment, including reliance on applicable LAUSD technical personnel from the Office of Environmental Health and Safety (OEHS) and other departments.~~

¹ 14 CCR Section 15132

1. Executive Summary

Data for this EIR were obtained from field observations; discussions with affected agencies; analysis of adopted jurisdictional agency plans and policies and LAUSD ~~Standards~~Standard Conditions of Approval; review of available studies, reports, data, and similar literature; specialized environmental assessments prepared for previous site-specific projects;² and past experience with school construction and upgrade projects.

1.2 ENVIRONMENTAL PROCEDURES

This EIR has been prepared to assess the environmental effects associated with implementation of the SUP, as well as anticipated future discretionary actions and approvals. The six main objectives of this document as established by CEQA are:

- 1) To disclose to decision makers and the public the significant environmental effects of proposed activities.
- 2) To identify ways to avoid or reduce environmental damage.
- 3) To prevent environmental damage by requiring implementation of feasible alternatives or mitigation measures.
- 4) To disclose to the public reasons for agency approval of projects with significant environmental effects.
- 5) To foster interagency coordination in the review of projects.
- 6) To enhance public participation in the planning process.³

An EIR is the most comprehensive form of environmental documentation identified in CEQA and the State CEQA Guidelines and provides the information needed to assess the environmental consequences of a proposed project, to the extent feasible. EIRs are intended to provide an objective, factually supported, full-disclosure analysis of the environmental consequences associated with a proposed project that has the potential to result in significant, adverse environmental impacts.

An EIR is also one of various decision-making tools used by a lead agency to consider the merits and disadvantages of a project that is subject to its discretionary authority. Prior to approving a proposed project, the lead agency must consider the information in the EIR, determine whether the EIR was properly prepared in accordance with CEQA and the State CEQA Guidelines, determine that it reflects the independent judgment of the lead agency, adopt findings concerning the project's significant environmental impacts and alternatives, and adopt a Statement of Overriding Considerations if the proposed project would result in significant impacts that cannot be reduced to less than significant.

² Aesthetics, agricultural resources, air quality, biological resources, cultural resources, geological resources, hazards and hazardous materials, hydrology and water quality, land use, mineral resources, noise, population and housing, public services, recreation, transportation and traffic, and utilities and service systems.

³ PCR, Section 21002.1. Use Of Environmental Impact Reports; Policy

1. Executive Summary

1.2.1 EIR Format

This EIR has been formatted as described below.

~~**Section Chapter 1, Executive Summary.** Summarizes the background and description of the proposed project, the format of this EIR, project alternatives, any critical issues remaining to be resolved, and the potential environmental impacts and mitigation measures identified for the project.~~

~~**Chapter Section 2, Introduction.** Describes the purpose of this EIR, background on the project, the Notice of Preparation, and Final EIR certification.~~

~~**Chapter Section 3, Environmental Setting.** A description of the physical environmental conditions in the District as they existed at the time the Notice of Preparation was published, from both a local and regional perspective. The environmental setting provides baseline physical conditions from which the lead agency determines the significance of environmental impacts resulting from the proposed project.~~

~~**Chapter Section 4, Project Description.** Location of the District, a detailed description of the SUP, the objectives of the SUP, an overview of student enrollment projections, approvals anticipated to be included as part of the project, the necessary environmental clearances for the project, and the intended uses of this EIR.~~

~~**Chapter Section 5, Environmental Analysis.** For each environmental parameters topic analyzed, provides a description of the thresholds used to determine if a significant impact would occur; the methodology to identify and evaluate the potential impacts of the project; the existing environmental setting; the potential adverse and beneficial effects of the SUP; the level of impact significance before mitigation; the mitigation measures for the SUP, if any; the level of significance of the adverse impacts after compliance with jurisdictional regulations, LAUSD Standards Standard Conditions of Approval, and any mitigation. Bibliographical references for information sources and technical data are footnoted. A stand-alone bibliography is not required.~~

Because this is a program-level document it inherently assesses cumulative impacts associated with the SUP; therefore, cumulative impacts are analyzed in each section of Chapter 5.

~~The SUP includes implementation of LAUSD standard conditions, guidelines, specifications, practices, policies, and project design features (LAUSD Standards). LAUSD Standards are described below:~~

~~■ **Project Design Features (“PDFs”).** The analysis of each topic includes a description of any PDFs incorporated into SUP related projects. PDFs are based on the following approved documents:~~

~~● **2004 New Construction Program EIR Mitigation Measures**, adopted by the Board of Education on June 2004.~~

~~● **LAUSD Best Management Practices**, adopted by the Board of Education on June 2004 as part of the 2004 program EIR.~~

1. Executive Summary

• ~~The Collaborative for High Performance Schools. High Performance Schools Best Practices Manual, Volume III: Criteria. Version 1.0, November 1, 2001. Adopted by the Board of Education on October 28, 2003. Updated 2009 CHPS Scorecard with 2011 Amendments.~~

• ~~Others based on mitigation measures adopted for previous projects.~~

■ ~~**Standard Conditions.** These include LAUSD approved specifications, practices, policies, procedural and guidance documents, including but not limited to:~~

• ~~OEHS CEQA Specification Manual~~

• ~~Stormwater Technical Manual~~

• ~~Traffic and Pedestrian Safety Requirements~~

• ~~Sidewalk Requirements for New Schools~~

• ~~School Design Guide~~

• ~~Relocation Assistance Advisory Program~~

• ~~Marquee Signs Bulletin BUL 5004.1~~

• ~~Board of Education resolutions~~

• ~~LAUSD Traffic Safety Reference Guide, REF 4492.1~~

Chapter Section 6, Significant Unavoidable Adverse Impacts. Describes the significant unavoidable adverse impacts of the SUP.

Chapter Section 7, Alternatives to the SUP. Describes the impacts of the alternatives to the SUP, including the No Project Alternative and a Reduced Intensity Alternative.

Chapter Section 8, Significant Irreversible Changes Due to the SUP. Describes the significant irreversible environmental changes associated with the SUP.

Chapter Section 9, Growth-Inducing Impacts of the SUP. Describes the ways in which the SUP would cause increases in employment or population that could result in new physical or environmental impacts.

Chapter 10, Comments on the Draft EIR. Discusses the legal requirements for comments and responses, and provides all written comments on the Draft EIR and the District's responses to each comment.

Section-Chapter 1011, Persons Preparing the EIR. Lists the people who prepared this EIR for the SUP.

Appendices. The appendix for this EIR has the following supporting documents and information:

Appendix A. CEQA Notices

1. Executive Summary

- A-1 Notice of Preparation
- A-2 Notice of Preparation Comment Letters
- A-3 Notice of Availability of Draft EIR
- A-4 Notice of Availability of Draft EIR-Extended Public Review

Appendix B. Cultural Resource

- B-1 Historic Resource Context Statement 2014
- B-2 Historic Schools Design Guidelines 2015
- B-3 Historic Resource Exemptions 2005
- B-4 Historic Resource CEQA Flowchart 2015

Appendix C. Student Population Forecast

Appendix D. Environmental Analysis

- D-1 Environmental Analysis
- D-2 CEQA Procedures 2003
- D-3 Initial Study Checklist

Appendix E. CEQA Infill Streamlining

Appendix F. LAUSD Standard Conditions of Approval

- ~~Appendix A: Notice of Preparation and Comments~~
- ~~Appendix B: Cultural Resource Studies (C-1 2014; C-2 2002)~~

1.2.2 ~~Appendix C: Student Population Forecast~~ Type and Purpose of This EIR

This EIR fulfills the requirements for a Program EIR. Although the legally required contents of a program-level EIR are the same as those of a project-level EIR, a Program EIR is typically more conceptual and may contain a more general discussion of impacts, alternatives, and ~~mitigation~~ measures than a Project EIR. As provided in Section 15168 of the State CEQA Guidelines, a Program EIR may be prepared on a series of actions that can be characterized as one large project. Use of a Program EIR provides the LAUSD (as lead agency) with the opportunity to consider broad policy alternatives and programwide ~~mitigation~~ measures, and provides the LAUSD with greater flexibility to address project-specific and cumulative environmental impacts on a comprehensive basis.

Agencies generally prepare Program EIRs for programs or a series of related actions that are linked geographically; are logical parts of a chain of contemplated events, rules, regulations, or plans that govern the conduct of a continuing program; or are individual activities carried out under the same authority and having generally similar environmental effects that can be mitigated in similar ways.

1. Executive Summary

Once a Program EIR has been prepared, subsequent activities within the program must be evaluated to determine whether an additional CEQA document needs to be prepared. However, if the Program EIR addresses the program's effects as specifically and comprehensively as possible, many subsequent activities could be found to be within the Program EIR scope, and additional environmental documents may not be required.⁴ When a Program EIR is relied on for a subsequent activity, the lead agency must incorporate ~~feasible-any~~ mitigation measures and alternatives developed in the Program EIR into the subsequent activities.⁵ If a subsequent activity would have effects not within the scope of the Program EIR, the lead agency must prepare a new Initial Study leading to a Negative Declaration, Mitigated Negative Declaration, or an EIR. In this case, the Program EIR still serves a valuable purpose as the first-tier environmental analysis. The State CEQA Guidelines encourage the use of Program EIRs, citing five advantages:⁶

- Provide a more exhaustive consideration of impacts and alternatives than would be practical in an EIR on an individual action.
- Focus on cumulative impacts that might be slighted in a case-by-case analysis.
- Avoid continual reconsideration of recurring policy or program issues.
- Consider broad policy alternatives and programmatic mitigation measures at an early stage when the agency has greater flexibility to deal with them.
- Reduce paperwork by encouraging the reuse of data (through tiering).

■ _____

1.3 SUP LOCATION

The SUP is a District-wide program and covers schools throughout the entire District. The District boundary covers a 710-square-mile area in southern Los Angeles County. The District extends north to the San Gabriel Mountains in the Angeles National Forest; west to the Ventura County boundary and to the Pacific Ocean, including the communities of Venice, Marina Del Rey, and Playa Del Rey in the City of Los Angeles; east to the community of East Los Angeles in unincorporated Los Angeles County; and south to the community of San Pedro in the City of Los Angeles, and parts of the cities of Rancho Palos Verdes and Rolling Hills Estates in the Palos Verdes Peninsula. This area includes most of the city of Los Angeles, along with all or portions of 31 cities and unincorporated areas of Los Angeles County (see Figure ES-1, *Regional Location* and Figure ES-2, *Local Vicinity*).

⁴ 14 CCR Section 15168(c).

⁵ 14 CCR Section 15168(c)(3).

⁶ 14 CCR Section 15168(b).

1. Executive Summary

Cities Entirely within LAUSD

Cudahy	Lomita	Vernon
Gardena	Maywood	West Hollywood
Huntington Park	San Fernando	

Cities Partially within LAUSD

Alhambra*	Downey	Rancho Palos Verdes
Bell	El Segundo	Rolling Hills Estates
Bell Gardens	Hawthorne	Santa Clarita*
Beverly Hills	Inglewood	Santa Monica
Calabasas*	Long Beach	South Gate
Carson	Lynwood	South Pasadena*
City of Commerce	Montebello	Torrance
Culver City	Monterey Park	

* Only a few parcels of land are in LAUSD, and they generate no enrollment.

1.4 SUP COMPONENT SUMMARY

Because of the extensive number of individual projects anticipated under the SUP, they have been grouped into four categories based on the amount and type of construction and on location of the project. Currently, site-specific projects at individual school campuses have not been identified.

- Type 1. New Construction on New Property (adjacent to existing campus)
- 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 type of projects that are anticipated to be undertaken as part of the SUP are explained below.

1.4.1 Type 1. New Construction on New Property

- Property acquisition adjacent to existing campus for campus expansion. These projects may include, but are not limited to, new building construction for classrooms, library/media center, performing arts, gymnasium, administration offices, and other construction, such as a stadium, athletic fields, restrooms, drop-off zones, parking, and driveways.

1. Executive Summary

1.4.2 Type 2. New Construction on Existing Campus

- New classroom building; net increase in student capacity greater than 25 percent or 10 classrooms, whichever is greater.
- New classroom building; net increase in student capacity less than 25 percent or 10 classrooms, whichever is greater.

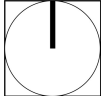
1. Executive Summary

Figure ES-1 Regional Location



Source: LA County DRP, 2013; ESRI, 2014

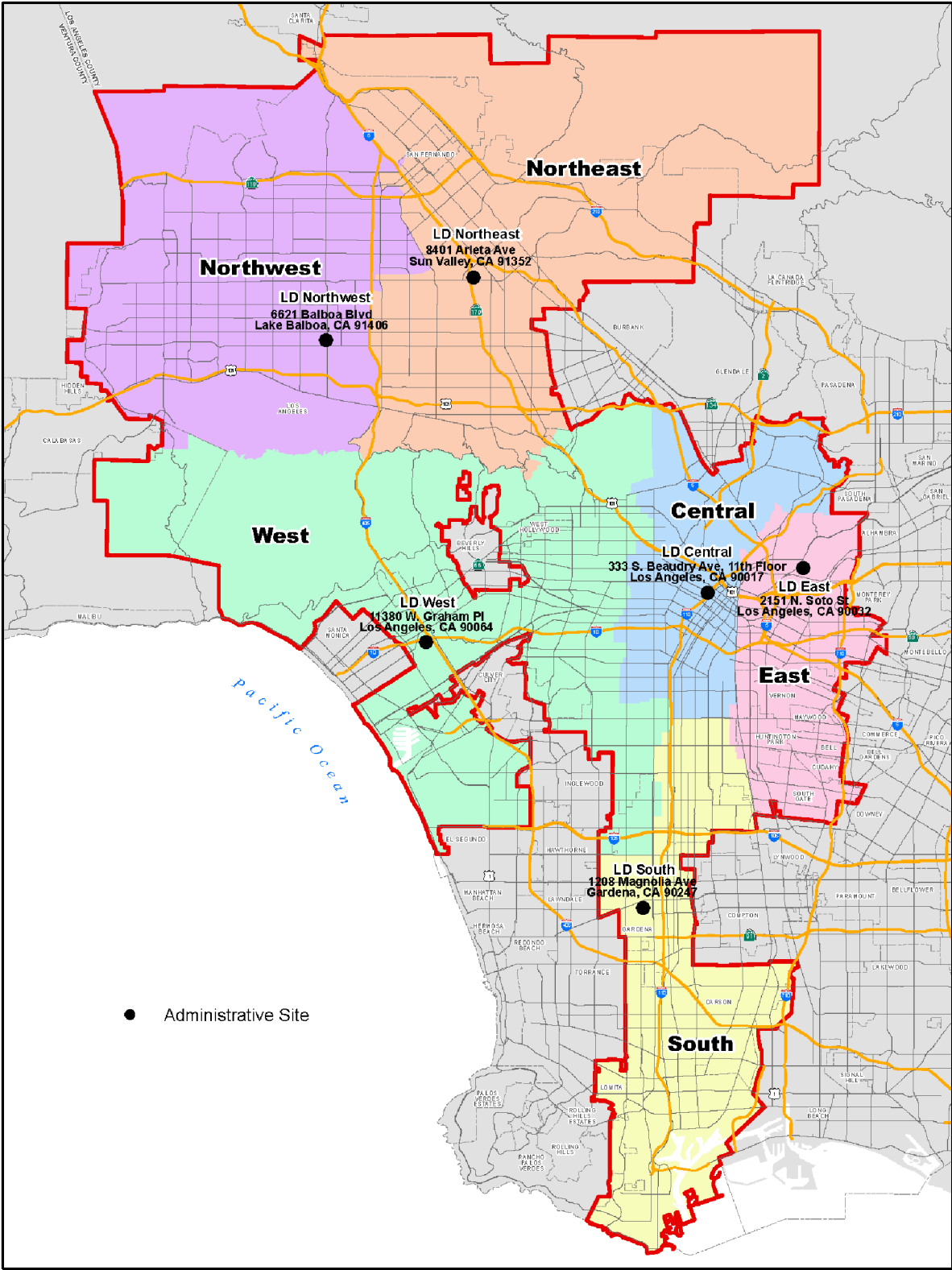
0 25 50 Miles



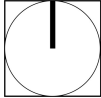
1. Executive Summary

This page intentionally left blank.

1. Executive Summary Figure ES-2 Local Vicinity



Source: Los Angeles Unified School District, 2015



1. Executive Summary

This page intentionally left blank.

1. Executive Summary

- New building, including but not limited to, library/media center, performing arts, auditorium, gymnasium, and other construction such as athletic venue lights (for field or outdoor pool), stadiums, outdoor pools, athletic fields.
- Demolition and new building construction on existing campus (replace school building on same location).
- Installation of temporary structures.
- Construction of new health clinic, parent and family center, or other community uses, including joint use on existing campus.
- Construction of restrooms, drop-off zones, new parking lots, new driveways.

1.4.3 Type 3. Modernization, Repair, Replacement, Upgrade, Remodel, Renovation, and Installation

- Installation of modular units, portable classrooms, or bungalows; net increase in student capacity is greater than 25 percent or 10 classrooms, whichever is greater.
- Installation of modular units, portable classrooms, or bungalows; net increase in student capacity is less than 25 percent or 10 classrooms, whichever is greater (considered a minor addition because it qualifies for a CEQA Exemption).
- Improvements to existing health clinic, parent and family center, or other community uses on existing campus.
- Demolition and removal of permanent buildings or structures.
- Installation at existing schools, such as play equipment, fencing, ADA compliance.
- Outdoor repair, modernization, replacement or upgrade of athletic fields (natural grass to synthetic turf), play equipment, fencing, parking, replace shade shelter, asphalt/concrete paths, driveways, ADA compliance, seismic retrofits.
- Sustainability energy conservation installations, such as new photovoltaic panels on rooftops and parking lot shade structures or wind arrays.
- Repair and replacement of building systems, such as flooring, windows, and roofing.
- New or replacement furniture or other interior equipment.
- Replace existing diesel buses with higher efficiency buses.

1. Executive Summary

- Sustainability energy conservation changes such as replacement, upgrade, or retrofit of inefficient lighting, electrical transformers, or building insulation, or installation of irrigation smart controllers.
- Structural upgrades of modular units or portable classrooms, relocation of portables on campus.
- Exterior cosmetic improvements such as Facelift Program, painting, site cleanup.
- Interior remodeling and renovations; painting; installation, repair, and upgrades to fire/life-safety/security/emergency systems; ADA; plumbing, lighting, electrical, HVAC, and computer systems; low-flow restroom fixtures, food service equipment.
- Replacement of lead water pipes.
- Abatement of lead-based paint and asbestos in buildings.

1.4.4 Type 4. Operational and Other Campus Changes

- Removal of modular units, portable classrooms, bungalows, or other temporary structures at existing school facilities.
- Change in student capacity (student classroom loading).
- Change in grade structure (e.g., change grades from 4–6 to 7–8 or other).
- Change in use or occupancy of existing facilities (charter school, co-locations, joint use).
- Co-location or land lease agreements for charter school facilities.
- Closure of existing school or transfer of students to another school.
- Reopening closed schools.
- Lease or use of non-District property for student classroom purposes.

1.5 PROJECT ALTERNATIVES

1.5.1 No Project Alternative

The No Project Alternative would only involve maintenance and critical repairs required for health and safety, that is, repair and maintenance of those construction, protection, and occupancy features necessary to minimize danger to life and to maintain full compliance with current codes and regulations.

This alternative would not involve property acquisition or construction or installation of any buildings. Existing buildings and school campuses would continue to deteriorate (most noticeably cosmetically as

1. Executive Summary

nonessential maintenance and repairs are deferred). The No Project Alternative would include, but not be limited to, the following types of minor essential projects:

- Heating, ventilation, and air conditioning (HVAC) repairs needed to maintain classroom temperatures conducive to learning.
- Repair of broken unsafe walkways and driveways.
- Seismic retrofits.
- Maintenance of fire alarm and fire suppression systems.
- Replacement of poor lighting.
- Repairs to security systems and emergency communications systems.
- Abatement of asbestos and lead-based paint.
- Replacement of lead pipes.
- Improvements for Americans with Disabilities Act (ADA) compliance: ramps, rails, etc.
- Replacement fencing.
- Essential replacement of building systems such as flooring, windows, and roofing.
- Essential repair of modular units or portable classrooms.
- Relocation of portables on campus to avoid a safety hazard.

1.5.2 Reduced SUP Alternative

This alternative would not entail installation of more than nine modular or portable classroom buildings, acquisition of any property, or the construction of any permanent buildings. All projects under this alternative would qualify for one or more of the CEQA statutory or categorical exemptions listed in Chapter 4, *Project Description*.

- Installation of modular units, portable classrooms, or bungalows; resulting in a net increase student capacity *less than* 25 percent or 10 classrooms, whichever is greater.
- Sustainability energy conservation installations such as new photovoltaic panels on rooftops and parking lot shade structures or small wind arrays.
- Essential and cosmetic replacement of building systems, such as flooring, windows, and roofing.

1. Executive Summary

- New or replacement furniture or other interior equipment.
- Replace existing diesel buses with higher efficiency buses.
- Sustainability energy conservation changes, such as replacement, upgrade, or retrofit of inefficient lighting, electrical transformers, or building insulation, and installation of irrigation smart controllers.
- Essential and cosmetic upgrades of modular units or portable classrooms, relocation of portables on campus.
- Exterior cosmetic improvements such as Facelift Program, painting, site cleanup.
- Essential and nonessential interior remodeling and renovations; painting; installation, repair, and upgrades to fire/life-safety/security/emergency systems; ADA; plumbing, lighting, electrical, HVAC, and computer systems; low-flow restroom fixtures; food service equipment.
- Change in student capacity (student classroom loading but not an increase in school seating).
- Closure of existing school or transfer of students to another school (as long as the increase at the new school does not generate a significant environmental impact).

1.6 ISSUES TO BE RESOLVED

~~Section 15123(b)(3) of the~~ The State CEQA Guidelines Section 15123(b)(3) requires that an EIR contain issues to be resolved, including the choice among alternatives and whether or how to mitigate significant impacts. With regard to the proposed project, the major issues to be resolved include decisions by the lead agency as to:

1. Whether this EIR adequately describes the environmental impacts of the project.
2. Whether the benefits of the SUP override environmental impacts that cannot be feasibly avoided or mitigated to a level of insignificance.
3. Whether the identified LAUSD Standards should be adopted or modified.
4. Whether there are any alternatives to the project that would substantially lessen any of the significant impacts of the SUP and achieve most of the objectives.

1.7 AREAS OF CONTROVERSY

In accordance with ~~Section 15123(b)(2) of the~~ State CEQA Guidelines Section 15123(b)(2), the EIR summary must identify areas of controversy known to the lead agency, including issues raised by agencies and the public. There are no specific areas of known controversy concerning the SUP. The LAUSD has no knowledge of any expressed opposition to the SUP.

1. Executive Summary

Prior to preparation of the EIR, the Notice of Preparation was distributed for comment between November 18, 2013, and December 18, 2013. A summary of the NOP comment letters received are summarized in Section 2.0, *Introduction* (see Table 2-1). Agency letters in response to the NOP included requests to address topical concerns such as aesthetics, cultural resources, hydrology, biological resources, and traffic.

1.8 SUMMARY OF ENVIRONMENTAL IMPACTS, ~~MITIGATION~~ MEASURES, AND LEVELS OF SIGNIFICANCE AFTER MITIGATION

Table 1-1 summarizes the conclusions of the environmental analysis in this EIR. The table lists impacts identified as no impact, less than significant, or potentially significant; any feasible mitigation measures⁷ that are available to reduce significant impacts; and the level of significance after compliance with any measures.

⁷ Mitigation measures must reduce significant environmental impacts and are above and beyond any project design features (PDFs), implementation of Standard Conditions of Approval (SCs) and compliance with federal, state and local laws and regulations.

1. Executive Summary

This page intentionally left blank.

1. Executive Summary

Table 1-1 Summary of Environmental Impacts, Mitigation Measures, and Level of Significance After Mitigation

Environmental Topics and Thresholds	Level of Impact Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
5.1 AESTHETICS			
5.1-1 SUP-related projects would not have a substantial adverse effect on scenic vistas.	Less Than Significant	No mitigation measures are required	Less Than Significant
5.1-2 SUP-related projects would not alter scenic resources within a state scenic highway.	Less Than Significant	No mitigation measures are required	Less Than Significant
5.1-3 SUP-related projects would not substantially degrade the existing visual character or quality of the site and its surroundings.	Less Than Significant	No mitigation measures are required	Less Than Significant
5.1-4 SUP-related projects would not generate substantial light or glare which would adversely affect day or nighttime views.	Less Than Significant	No mitigation measures are required	Less Than Significant
5.2 AGRICULTURE AND FORESTRY RESOURCES			
5.2-1 The program would not result in conversion of mapped farmland to nonagricultural uses.	Less Than Significant	No mitigation measures are required	Less Than Significant
5.2-2 The proposed program would not conflict with existing zoning for agricultural use or with land covered by an existing Williamson Act contract.	No Impact	No mitigation measures are required	Less Than Significant
5.2-3 The SUP would not conflict with zoning for forest land or timberland.	No Impact	No mitigation measures are required	Less Than Significant
5.2-4 The SUP would not result in the loss of forest land or conversion of forest land to non-forest use.	No Impact	No mitigation measures are required	Less Than Significant
5.2-5 SUP implementation would not involve other changes in the existing environment which could result in conversion of Farmland to nonagricultural use or conversion of forest land to non-forest use.	Less Than Significant	No mitigation measures are required	Less Than Significant
5.3 AIR QUALITY			
5.3-1 SUP-related projects would be consistent with the applicable air quality management plan.	Less Than Significant	No mitigation measures are required	Less Than Significant
5.3-2 Construction activities may generate short-term emissions that exceed of the South Coast Air Quality Management District's regional significance thresholds and cumulatively contribute to the South Coast Air Basin nonattainment designations.	Potentially Significant	No mitigation measures are available that would further reduce short-term emissions and impacts to the regional air quality.	Significant and Unavoidable

1. Executive Summary

Table 1-1 Summary of Environmental Impacts, Mitigation Measures, and Level of Significance After Mitigation

Environmental Topics and Thresholds	Level of Impact Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
5.3-3 Site-specific projects would not generate long-term emissions that would exceed the South Coast Air Quality Management District's regional significance thresholds, but may cumulatively contribute to the South Coast Air Basin nonattainment designations.	Less Than Significant	No mitigation measures are required	Less Than Significant
5.3-4 Site-specific projects may generate short-term emissions that exceed South Coast Air Quality Management District's localized significance thresholds and expose sensitive receptors to substantial pollutant concentrations.	Potentially Significant	No mitigation measures are available that would further reduce short-term onsite emissions and impacts to the localized air quality.	Significant and Unavoidable
5.3-5 Implementation of SUP-related projects would not expose sensitive receptors to substantial pollutant concentrations.	Less Than Significant	No mitigation measures are required	Less Than Significant
5.3-6 Implementation of SUP-related projects would not create objectionable odors.	Less Than Significant	No mitigation measures are required	Less Than Significant
5.3-7 Site-specific projects would not expose sensitive receptors in proximity to freeways and major roadways to substantial pollutant concentrations.	Less Than Significant	No mitigation measures are required	Less Than Significant
5.4 BIOLOGICAL RESOURCES			
5.4-1 SUP-related project implementation could impact sensitive species.	Less Than Significant	No mitigation measures are required	Less Than Significant
5.4-2 SUP-related project could impact riparian habitats or other sensitive natural communities.	Less Than Significant	No mitigation measures are required	Less Than Significant
5.4-3 SUP-related project implementation could impact jurisdictional waters or wetlands.	Less Than Significant	No mitigation measures are required	Less Than Significant
5.4-4 SUP-related project implementation would not affect wildlife movement or nesting.	Less Than Significant	No mitigation measures are required	Less Than Significant
5.4-5 SUP-related project implementation would not conflict with any local policies or ordinances protecting biological resources.	Less Than Significant	No mitigation measures are required	Less Than Significant
5.4-6 Program implementation would not conflict with an adopted Habitat Conservation Plan or Natural Community Conservation Plan.	Less Than Significant	No mitigation measures are required	Less Than Significant

1. Executive Summary

Table 1-1 Summary of Environmental Impacts, Mitigation Measures, and Level of Significance After Mitigation

Environmental Topics and Thresholds	Level of Impact Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
5.5 CULTURAL RESOURCES			
5.5-1 SUP-related project implementation may substantially degrade the significance of historical resources.	Potentially Significant	No mitigation measures are available that would further reduce significant impacts to historic resources.	Significant and Unavoidable
5.5-2 SUP implementation may impact archaeological resources.	Less Than Significant	No mitigation measures are required	Less Than Significant
5.5-3 The proposed program could destroy paleontological resources or a unique geologic feature.	Less Than Significant	No mitigation measures are required	Less Than Significant
5.5-4 Grading activities could potentially disturb human remains.	Less Than Significant	No mitigation measures are required	Less Than Significant
5.6 GEOLOGY AND SOILS			
5.6-1 SUP implementation would not subject people or structures to substantial hazards from surface rupture of a known active fault.	Less Than Significant	No mitigation measures are required	Less Than Significant
5.6-2 Program implementation would not subject people or structures to substantial hazards from strong ground shaking.	Less Than Significant	No mitigation measures are required	Less Than Significant
5.6-3 Program implementation would not subject people or structures to substantial hazards from liquefaction.	Less Than Significant	No mitigation measures are required	Less Than Significant
5.6-4 Program implementation would not expose people or structures to substantial hazards from landslides.	Less Than Significant	No mitigation measures are required	Less Than Significant
5.6-5 Implementation of SUP-related projects would not cause substantial soil erosion or loss of topsoil.	Less Than Significant	No mitigation measures are required	Less Than Significant
5.6-6 Program implementation would not expose people or structures to substantial hazards from collapsible soils, ground subsidence, or corrosive soils.	Less Than Significant	No mitigation measures are required	Less Than Significant
5.6-7 Program implementation would not subject people or structures to substantial hazards from expansive soils.	Less Than Significant	No mitigation measures are required	Less Than Significant

1. Executive Summary

Table 1-1 Summary of Environmental Impacts, Mitigation Measures, and Level of Significance After Mitigation

Environmental Topics and Thresholds	Level of Impact Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
5.7 GREENHOUSE GAS EMISSIONS			
5.7-1 SUP-related projects may generate GHG emissions that could exceed the thresholds and cumulatively contribute to GHG emissions impacts.	Less Than Significant	No mitigation measures are required	Less Than Significant
5.7-2 The SUP would not conflict with plans adopted for the purpose of reducing GHG emissions.	Less Than Significant	No mitigation measures are required	Less Than Significant
5.8 HAZARDS AND HAZARDOUS MATERIALS			
5.8-1 Implementation of SUP-related projects would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.	Less Than Significant	No mitigation measures are required	Less Than Significant
5.8-2 Implementation of the SUP would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.	Less Than Significant	No mitigation measures are required	Less Than Significant
5.8-3 SUP-related projects would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substance, or waste within one-quarter mile of an existing or proposed school.	Less Than Significant	No mitigation measures are required	Less Than Significant
5.8-4 SUP-related projects may be located on a site which is included on a list of hazardous materials compiled pursuant to Government Code Section 65962.5 but would not create a significant hazard to the public or the environment.	Less Than Significant	No mitigation measures are required	Less Than Significant
5.8-5 SUP-related projects would not result in an airport safety hazard for people residing or working in the project area.	Less Than Significant	No mitigation measures are required	Less Than Significant
5.8-6 SUP-related projects would not result in a private airstrip safety hazard for people residing or working in the project area.	Less Than Significant	No mitigation measures are required	Less Than Significant
5.8-7 The SUP would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.	Less Than Significant	No mitigation measures are required	Less Than Significant
5.8-8 The SUP would not expose people or structures to a significant risk of loss, injury or death involving wildland fires.	Less Than Significant	No mitigation measures are required	Less Than Significant
5.8-9 Proposed SUP-related project sites are not anticipated to contain a current or former hazardous waste disposal site or solid waste disposal site and, if so, wastes have been	Less Than Significant	No mitigation measures are required	Less Than Significant

1. Executive Summary

Table 1-1 Summary of Environmental Impacts, Mitigation Measures, and Level of Significance After Mitigation

Environmental Topics and Thresholds	Level of Impact Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
removed.			
5.8-10 SUP-related project sites may be located on a hazardous substance release site, but DTSC compliance would ensure full clean up.	Less Than Significant	No mitigation measures are required	Less Than Significant
5.8-11 SUP-related project site would not contain one or more pipelines, situated underground or aboveground, which carry hazardous substances, acutely hazardous materials, or hazardous wastes.	Less Than Significant	No mitigation measures are required	Less Than Significant
5.9 HYDROLOGY AND WATER QUALITY			
5.9-1 SUP-related projects would not violate any water quality standards or waste discharge requirements.	Less Than Significant	No mitigation measures are required	Less Than Significant
5.9-2 SUP-related projects would not substantially deplete groundwater supplies or interfere substantially with groundwater recharge.	Less Than Significant	No mitigation measures are required	Less Than Significant
5.9-3 SUP-related projects would not substantially alter the existing drainage pattern of the site or area in a manner which would result in a substantial erosion or siltation on- or off-site.	Less Than Significant	No mitigation measures are required	Less Than Significant
5.9-4 SUP-related projects would not substantially alter the existing drainage pattern of the site or area, or increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site.	Less Than Significant	No mitigation measures are required	Less Than Significant
5.9-5 SUP-related projects would not create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff.	Less Than Significant	No mitigation measures are required	Less Than Significant
5.9-6 SUP-related projects would not otherwise substantially degrade water quality.	Less Than Significant	No mitigation measures are required	Less Than Significant
5.9-7 SUP-related projects would not place housing within a 100-year flood hazard area.	Less Than Significant	No mitigation measures are required	Less Than Significant
5.9-8 SUP-related projects would not place within a 100-year flood hazard area structures which would impede or redirect flood flows.	Less Than Significant	No mitigation measures are required	Less Than Significant
5.9-9 SUP-related projects could expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam.	Less Than Significant	No mitigation measures are required	Less Than Significant

1. Executive Summary

Table 1-1 Summary of Environmental Impacts, Mitigation Measures, and Level of Significance After Mitigation

Environmental Topics and Thresholds	Level of Impact Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
5.9-10 SUP-related projects may be subject to inundation by seiche, tsunami, or mudflow.	Less Than Significant	No mitigation measures are required	Less Than Significant
5.10 LAND USE AND PLANNING			
5.10-1 SUP implementation would not divide established communities.	Less Than Significant	No mitigation measures are required	Less Than Significant
5.10-2 SUP implementation would not conflict with applicable plans adopted for the purpose of avoiding or mitigating an environmental effect.	Less Than Significant	No mitigation measures are required	Less Than Significant
5.10-3 The SUP would not conflict with the adopted Habitat Natural Communities Conservation Plan.	Less Than Significant	No mitigation measures are required	Less Than Significant
5.11 MINERAL RESOURCES			
5.11-1 Program implementation would not result in the loss of availability of a known mineral resource.	Less Than Significant	No mitigation measures are required	Less Than Significant
5.12 NOISE			
5.12-1 SUP implementation may result in exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance.	Potentially Significant	No mitigation measures are available that would further reduce construction noise impacts	Significant and Unavoidable
5.12-2 SUP-related project construction activities may result in exposure of persons to or generation of excessive ground borne vibration or ground borne noise levels.	Potentially Significant	No mitigation measures are available that would further reduce construction vibration impacts	Significant and Unavoidable
5.12-3 Traffic generated by SUP-related projects would not result in substantial permanent increase in ambient noise levels.	Less Than Significant	No mitigation measures are required	Less Than Significant
5.12-4 Construction activities may result substantial temporary or periodic increase in ambient noise levels in the project vicinity.	Potentially Significant	No mitigation measures are available that would further reduce construction vibration impacts	Significant and Unavoidable
5.12-5 If a SUP-related project is within an airport land use plan or within two miles of a public use airport or private airstrip, it may expose students or staff to excessive noise levels.	Less Than Significant	No mitigation measures are required	Less Than Significant

1. Executive Summary

Table 1-1 Summary of Environmental Impacts, Mitigation Measures, and Level of Significance After Mitigation

Environmental Topics and Thresholds	Level of Impact Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
5.13 PEDESTRIAN SAFETY			
5.13-1 SUP-related project implementation 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
5.13-2 SUP implementation would not create unsafe routes to schools for students walking from local neighborhoods.	Less Than Significant	No mitigation measures are required	Less Than Significant
5.13-3 SUP-related projects would not pose a safety hazard if located adjacent to or near a major arterial roadway or freeway.	Less Than Significant	No mitigation measures are required	Less Than Significant
5.14 POPULATION AND HOUSING			
5.14-1 SUP-related projects would not directly or indirectly induce substantial population growth in the District.	Less Than Significant	No mitigation measures are required	Less Than Significant
5.14-2 SUP implementation would not displace substantial numbers of existing housing, necessitating the construction of replacement housing.	Less Than Significant	No mitigation measures are required	Less Than Significant
5.14-3 SUP implementation would not displace substantial numbers of people, necessitating the construction of replacement housing.	Less Than Significant	No mitigation measures are required	Less Than Significant
5.15 PUBLIC SERVICES			
FIRE PROTECTION AND EMERGENCY SERVICES			
5.15-1 SUP-related projects would not require the construction of new or physically altered fire protection and emergency facilities.	Less Than Significant	No mitigation measures are required	Less Than Significant
POLICE PROTECTION SERVICES			
5.15-2 SUP-related projects would not require the construction of new or physically altered police protection facilities.	Less Than Significant	No mitigation measures are required	Less Than Significant
LIBRARY SERVICES			
5.15-3 SUP-related projects would not require the construction of new or physically altered library facilities.	Less Than Significant	No mitigation measures are required	Less v Significant

1. Executive Summary

Table 1-1 Summary of Environmental Impacts, Mitigation Measures, and Level of Significance After Mitigation

Environmental Topics and Thresholds	Level of Impact Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
5.16 RECREATION			
5.16-1 The SUP would not generate additional residents that would increase the use of existing park and recreational facilities.	Less Than Significant	No mitigation measures are required	Less Than Significant
5.16-2 SUP implementation would result in environmental impacts to provide new and/or expanded recreational facilities.	Less Than Significant	No mitigation measures are required	Less Than Significant
5.17 TRANSPORTATION and TRAFFIC			
5.17-1 SUP-related trip generation may have the potential to impact levels of service on the existing area roadway system.	Potentially Significant	No mitigation measures are available that would reduce traffic impacts to less than significant	Significant and Unavoidable
5.17-2 SUP-related trip generation may result in designated road and/or highways exceeding county congestion management agency standards.	Potentially Significant	No mitigation measures are available that would reduce traffic impacts to less than significant	Significant and Unavoidable
5.17-3 SUP-related trip generation would not impact the existing regional transit system and non-motorized travel system.	Less v Significant	No mitigation measures are required	Less Than Significant
5.17-4 SUP-related circulation improvements would not create potentially hazardous conditions (sharp curves, etc.), incompatible uses, or inadequate emergency access.	Less Than Significant	No mitigation measures are required	Less Than Significant
5.17-5 SUP-related projects would not result in a change in air traffic patterns or change in location that would result in substantial safety risks.	Less Than Significant	No mitigation measures are required	Less Than Significant
5.18 UTILITIES AND SERVICE SYSTEMS			
5.18-1 The SUP would not exceed wastewater treatment requirements of the Los Angeles Regional Water Quality Control Board.	Less Than Significant	No mitigation measures are required	Less Than Significant
5.18-2 The SUP would not require construction of new or expanded water treatment or wastewater treatment facilities.	Less Than Significant	No mitigation measures are required	Less Than Significant
5.18-3 The SUP would not cause significant environmental effects from the construction of new or expanded storm water drainage facilities.	Less Than Significant	No mitigation measures are required	Less Than Significant
5.18-4 SUP-related projects would have sufficient water supplies available from existing entitlements and resources, and new or expanded entitlements would not be needed.	Less Than Significant	No mitigation measures are required	Less Than Significant

1. Executive Summary

Table 1-1 Summary of Environmental Impacts, Mitigation Measures, and Level of Significance After Mitigation

Environmental Topics and Thresholds	Level of Impact Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
5.18-5 Landfill facilities would be able to accommodate SUP-related solid waste and the District would comply with related solid waste regulations.	Less Than Significant	No mitigation measures are required	Less Than Significant

Note: Table 1-1 lists SUP District-wide cumulative impacts. Future environmental analysis would be conducted on a project-by-project ~~base~~-basis and for site-specific locations and mitigation measures may be identified to reduce individual project-related impacts and cumulative impacts to less than significant levels.

- Mitigation measures must reduce significant environmental impacts and are above and beyond any project design features (PDFs), implementation of Standard Conditions of Approval (SCs) and compliance with federal, state and local laws and regulations.

1. Executive Summary

This page intentionally left blank.

2. Introduction

2.1 PURPOSE OF THE ENVIRONMENTAL IMPACT REPORT

Under the California Environmental Quality Act (CEQA), the proposed LAUSD School Upgrade Program (SUP) is considered a “project” and therefore is required to be compliant through an environmental analysis. “Project,” as defined by the CEQA Guidelines, means “the whole of an action, which has a potential for resulting in either a direct physical change in the environment, or a reasonably foreseeable indirect physical change in the environment, and that is: (1)... An activity directly undertaken by any public agency¹ [school district]... (2) An activity undertaken by a person² 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.”³ The activity may be subject to several discretionary approvals by governmental agencies.⁴ A Lead Agency is “the public agency which has the principal responsibility for carrying out or approving a project which may have a significant effect upon the environment.”⁵ The LAUSD has the principal responsibility for approval of the SUP. For this reason, the LAUSD is the CEQA Lead Agency for this project.

CEQA requires that all state and local governmental agencies consider the environmental consequences of projects over which they have discretionary authority prior to taking action on those projects. The EIR is the public document designed to provide decision makers and the public with an analysis of the environmental effects of the proposed project, to indicate possible ways to reduce or avoid environmental damage, and to identify alternatives to the project. The EIR must also disclose significant environmental impacts that cannot be avoided; growth inducing impacts; effects not found to be significant; and significant cumulative impacts of all past, present, and reasonably foreseeable future projects.

The intent of the EIR is to provide sufficient information on the potential environmental impacts of the proposed SUP to allow the LAUSD Board of Education to make an informed decision regarding approval of the project, and if approved, to streamline future CEQA compliance. Specific discretionary actions to be reviewed by the LAUSD are described later in Section 3.4, *Intended Uses of the EIR*.

¹ “Public agency” includes any state agency, board, or commission and any local or regional agency, as defined in these Guidelines. It does not include the courts of the state. This term does not include agencies of the federal government. (14 CCR Section 15376)

² “Person” includes any person, firm, association, organization, partnership, business, trust, corporation, limited liability company, company, district, city, county, city and county, town, the state, and any of the agencies and political subdivisions of such entities, and to the extent permitted by federal law, the United States, or any of its agencies or political subdivisions. (14 CCR Section 15379)

³ 14 CCR Section 15378(a)

⁴ 14 CCR Section 15378(c)

⁵ PCR Section 21067

2. Introduction

This EIR has been prepared in accordance with requirements of the:

- California Environmental Quality Act (CEQA) of 1970, as amended (Public Resources Code [PRC], Section 21000 et seq.)
- State Guidelines for the Implementation of the CEQA of 1970 (CEQA Guidelines), as amended (California Code of Regulations [CCR], Title 14, Sections 15000 et seq.)

The overall purpose of this EIR is to inform the lead agency, responsible agencies, decision makers, and the general public of the potential environmental effects from implementation of the SUP. This EIR addresses the potential environmental effects of the SUP, including effects that may be significant and adverse, and evaluates alternatives to the SUP.

2.2 NOTICE OF PREPARATION

Per the CEQA Guidelines Section 15082, the LAUSD determined that an EIR would be required for this project and issued a Notice of Preparation (NOP) on November 16, 2013. The NOP and comments received during the public review period (November 18, 2013 to December 18, 2013) can be found in Appendix A. The NOP process is used to help determine the scope of the environmental issues to be addressed in the EIR. Public outreach for the NOP included distribution using the following methods:

- Publication on November 18, 2013 in the Los Angeles Daily News (English) and La Opinion (Spanish) newspapers.
- Direct mail via USPS certified mail to 36 State and local agencies.
- Distributed to 15 State agencies through the Office of Planning and Research, State Clearinghouse
- Posted at the Los Angeles County

The NOP was also available for review at the following locations:

- LAUSD Facilities Services Division Office, 333 South Beaudry Avenue, 28th Floor, Los Angeles, CA 90017
- LAUSD Office of Environmental Health and Safety website at <http://www.lausd-oehs.org/documents.asp>

Comments received during the NOP public review period are in Appendix A. A total of five agencies submitted comments to the NOP. Table 2-1 summarizes the issues identified by the commenting agencies, along with a reference to the sections of this EIR where the issues are addressed.

2. Introduction

Table 2-1 NOP Comment Summary

Commenting Agency	Comment Type	Comment Summary	Issue Addressed In:
South Coast Air Quality Management District (12/24/2013)	Air Quality	<ul style="list-style-type: none"> • Requests a copy of the Draft EIR and all air quality modeling files. • States air quality regulations, methodology, guidance documents, and data sources for preparation of analysis 	Section 5.2, <i>Air Quality</i>
Native American Heritage Commission (11/18/2013)	Cultural Resources	<ul style="list-style-type: none"> • Letter identifies state and federal statutes relating to Native American historic properties and resources, and Native American Contacts. 	Section 5.5, <i>Cultural Resources</i>
County of Los Angeles Fire Department (12/19/2013)	Fire Protection Services	<ul style="list-style-type: none"> • Land Development Unit: Fire code ordinance requirements for construction, access, water mains, fire flows and fire hydrants. • Forestry division: Statutory responsibilities include erosion control, watershed management, rare and endangered species, vegetation, fuel modification, archeological and cultural resources, and oak tree ordinance. 	Section 5.4, <i>Biological Resources</i> Section 5.5, <i>Cultural Resources</i> Section 5.9, <i>Hydrology and Water Quality</i> Section 5.18, <i>Utilities and Service Systems</i>
City of Rancho Palos Verdes (11/26/2013)	Portable classrooms	<ul style="list-style-type: none"> • Consultation and notification of when temporary/portable classroom are replaced, added or relocated. • Aesthetic and traffic impacts from portables classrooms • Notification of any projects at 2 schools in city. 	Chapter 4, <i>Project Description</i> (CEQA requirements)
California Department of Transportation, District 7 (12/04/2013)		<ul style="list-style-type: none"> • Letter outlining elements of a typical traffic study. 	Section 5.17, <i>Transportation and Traffic</i>

2.3 SCOPE OF THIS EIR

Based on past experience and the magnitude of the proposed SUP, the LAUSD staff determined that an EIR should be prepared. ~~Because of the large reach of the proposed program, in compliance with CEQA Guidelines, LAUSD did not prepare an Initial Study (IS) to reduce the scope of the EIR; because the EIR includes an analysis of all 17 CEQA topics and 1 additional LAUSD topic (pedestrian safety).~~⁶ The EIR is required to identify any potentially significant adverse impacts and recommend mitigation that would reduce the impacts to less than insignificant.⁷

The information in Chapter 4, *Program Description*, establishes the basis for analyzing future SUP-related environmental impacts. However, further environmental review by the LAUSD may be required as more detailed information and plans are drafted on a site-specific, project-by-project basis.

⁶ 14 CCR Section 15060(d).

⁷ 14 CCR Sections 15126.2 and 15126.4.

2. Introduction

2.4 SUMMARY OF ENVIRONMENTAL IMPACTS

All impact thresholds in each of the 18 environmental resources assessed are analyzed in detail in Chapter 5 of this EIR. Impact significance levels are summarized in Chapter 1, *Executive Summary*, Table 1-1.

2.4.1 Impacts Considered Less Than Significant

SUP-related impacts to the following ~~12-14~~ environmental topics were identified as less than significant, after compliance with regulatory requirements and implementation of LAUSD Standards, as discussed in Chapter 5.

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

2.4.2 Impacts Considered Potentially Significant and Unavoidable

SUP-related impacts under four environmental topics were identified as potentially significant and unavoidable.

- Air Quality
- Cultural Resources
- Noise
- Transportation and Traffic

The LAUSD, as the Lead Agency, determined that unavoidable significant adverse impacts would likely result from the SUP; therefore, the LAUSD must prepare a “Statement of Overriding Considerations” before it can approve the SUP. A Statement of Overriding Considerations explains that the decision-making body (Board of Education) has balanced the benefits of the SUP against its potentially significant and unavoidable

2. Introduction

environmental effects and has determined that the benefits outweigh the adverse effects and, therefore, the environmental impacts are considered to be acceptable.

2.5 FINAL EIR CERTIFICATION AND PROJECT CONSIDERATION

~~This The Draft EIR is was being~~ circulated for a 98-day public review for a period (NOA-Draft EIR comment period -- June 24, 2014 to August 8, 2014, and comment period extension -- August 8, 2014 to September 30, 2014) (see Appendix A). ~~of 45 days.~~ Interested agencies and members of the public ~~are were~~ invited to provide written comments on the EIR, ~~to the LAUSD address shown on the title page of this document and in the Notice of Availability (NOA).~~ Upon completion of the 45-day public review period, the LAUSD staff ~~will reviewed~~ all written comments ~~received~~ and prepare a written responses for each comment. ~~This A Final EIR (FEIR) will incorporate~~ all of the comments received, responses to the comments, and any changes to the EIR that result from the comments ~~received~~. All agencies that commented on the Draft EIR will be notified of the availability of the Final EIR and the date of the public hearing before the Board.⁸

The LAUSD Board of Education will review and consider the Final EIR. If the Board finds that the Final EIR is "adequate and complete," the Board may certify the Final EIR. The rule of adequacy generally holds that the EIR can be certified if: (1) it shows a good faith effort at full disclosure of environmental information; and (2) it provides sufficient analysis to allow decisions to be made regarding the project in contemplation of its environmental consequences.

Upon review and consideration of the Final EIR, the Board may take action to adopt, revise, or reject the proposed SUP. This FEIR will be reviewed and considered by the LAUSD Board of Education for potential EIR certification. All agencies, organizations, and interested parties that commented on the EIR will be notified of the availability of the FEIR and the date of the public hearing before the Board.

The Final EIR is available for review at the following locations:

- LAUSD Facilities Services Division Office, 333 South Beaudry Avenue, 28th Floor, Los Angeles, CA 90017
- LAUSD Office of Environmental Health and Safety website at <http://www.lausd-oehs.org/documents.asp>

A decision to approve the SUP would be accompanied by written findings and a statement of overriding considerations in accordance with State CEQA Guidelines Section 15091 and Section 15093.

- No mitigation measures are required by this program-level EIR. LAUSD Standard Conditions of Approval will be adopted by the Board of Education and incorporated into future projects. These conditions provide sufficient performance standards for future projects to reduce environmental impacts. Preparation of

⁸ No organizations or interested parties commented on the Draft EIR.

2. Introduction

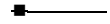
~~a Environmental Monitoring and Reporting Program⁹ commit the District to compliance tracking and follow-up on future SUP-related projects. Mitigation Monitoring and Reporting Program~~

~~■ No mitigation measures are required by this EIR. Therefore, no Mitigation Monitoring and Reporting Program will be considered for approval by the Board of Education when the Board considers the Final EIR for certification.~~

⁹ The LAUSD Environmental Monitoring and Reporting Program (EMRP) fully comply with the requirements under CEQA Section 21081.6 and CEQA Guidelines Section 15097 for preparation of a “reporting or monitoring program”.

2. Introduction

2. Introduction



This page intentionally left blank.

3. Environmental Setting

3.1 INTRODUCTION

The purpose of this chapter is to provide, pursuant to provisions of the California Environmental Quality Act (CEQA) and the State CEQA Guidelines, a “description of the physical environmental conditions in the vicinity of the project, as they exist at the time the notice of preparation is published, from both a local and a regional perspective.” The environmental setting will provide a set of baseline physical conditions that will serve as a tool from which the lead agency will determine the significance of environmental impacts resulting from the proposed School Upgrade Program (SUP).

3.2 REGIONAL ENVIRONMENTAL SETTING

3.2.1 Regional Location

The SUP covers schools within the entire Los Angeles Unified School District (LAUSD or District). The District boundary covers a 710-square-mile area in southern Los Angeles County (see Figure 3-1, *Regional Location*). LAUSD enrollment is the largest in California and the second largest in the United States.¹

3.3 LOCAL ENVIRONMENTAL SETTING

3.3.1 Project Location

~~This area~~LAUSD includes most of the city of Los Angeles, along with all or portions of 31 cities and unincorporated areas of Los Angeles County (see Figure 3-2, *Local Vicinity*).² The District extends north to the San Gabriel Mountains in the Angeles National Forest; west to the Ventura County boundary and to the Pacific Ocean, including the communities of Venice, Marina Del Rey, and Playa Del Rey in the City of Los Angeles; east to the community of East Los Angeles in unincorporated Los Angeles County; and south to the community of San Pedro in the City of Los Angeles, and parts of the cities of Rancho Palos Verdes and Rolling Hills Estates in the Palos Verdes Peninsula. ~~This area includes most of the city of Los Angeles, along with all or portions of 31 cities and unincorporated areas of Los Angeles County (see Figure 3-2, *Local Vicinity*).³~~

¹ New York City Department of Education has the largest enrollment in the US.

² Los Angeles Unified School District (LAUSD). Los Angeles Unified School District Fingertip Facts 2014-2015. <http://achieve.lausd.net/cms/lib08/CA01000043/Centricity/Domain/416/Fingertip%20Facts%202014-15-final.pdf>

³ Los Angeles Unified School District (LAUSD). 2013, October 9. Los Angeles Unified School District Fingertip Facts 2013-2014-2014-2015. <http://achieve.lausd.net/cms/lib08/CA01000043/Centricity/Domain/416/Fingertip%20Facts%202014-15-final.pdf> http://notebook.lausd.net/pls/ptl/docs/page/ea_lausd/lausdnet/offices/communications/communications_facts/11-42fingertipfactsrevised.pdf

3. Environmental Setting

Cities Entirely within LAUSD

Cudahy	Lomita	San Fernando
Gardena	Los Angeles	Vernon
Huntington Park	Maywood	West Hollywood

Cities Partially within LAUSD

Alhambra	Downey	Rancho Palos Verdes
Bell	El Segundo	Rolling Hills Estates
Bell Gardens	Hawthorne	Santa Clarita
Beverly Hills	Inglewood	Santa Monica
Calabasas*	Long Beach	South Gate
Carson	Lynwood	South Pasadena
Commerce	Montebello	Torrance
Culver City	Monterey Park	

* Only a few parcels of land are in LAUSD; and they generate no enrollment students.

LAUSD Educational Service Centers Local Districts

The District is divided geographically into six local districts: Northwest, Northeast, West, Central, East, and South ~~educational service centers (ESCs): South, East, West, and North~~ (see Figure 3-2). These local districts ~~ESCs~~ provide instructional and operational support, as well as parental and community engagement on a localized, constituency-specific level.

Incorporated cities and communities in unincorporated Los Angeles County, that are completely or partially ~~mostly~~ in the school district are listed below in Table 3-1.⁴

<u>Local District</u>	<u>Geography</u>	<u>Cities and Unincorporated Communities</u>
Northwest	<u>western half of the San Fernando Valley and some adjoining areas of the Santa Monica Mountains and Santa Susana Mountains.</u>	<ul style="list-style-type: none"> • <u>City of Los Angeles</u> <u>Unincorporated Los Angeles County including communities of:</u> <ul style="list-style-type: none"> • <u>Twin Lakes</u> <u>Gee</u>
Northeast	<u>eastern half of the San Fernando Valley and extends into part of the southwest San Gabriel Mountains.</u>	<ul style="list-style-type: none"> • <u>City of Los Angeles</u> • <u>City of San Fernando</u> • <u>Santa Clarita</u> <u>Unincorporated Los Angeles County including communities of:</u> <ul style="list-style-type: none"> - <u>Kagel Canyon</u>

⁴ LAUSD. 2015. June 9. Local Districts. <http://achieve.lausd.net/site/handlers/filedownload.ashx?moduleinstanceid=22580&dataid=24326&FileName=LocalDistrictswithIndex.pdf>.

3. Environmental Setting

		<ul style="list-style-type: none"> • <u>Lopez Canyon</u>
<u>West</u>	<u>City of Gardena on the south to Griffith Park and the Santa Monica Mountains on the north, and bounded by the Pacific Ocean and the west District boundary on the west.</u>	<ul style="list-style-type: none"> • <u>City of Los Angeles</u> • <u>West Hollywood</u> • <u>Beverly Hills</u> • <u>Calabasas</u> • <u>Culver City</u> • <u>El Segundo</u> • <u>Hawthorne</u> • <u>Inglewood</u> • <u>Santa Monica</u> <p>Unincorporated Los Angeles County including community of: <u>Marina Del Rey</u></p>
<u>Central</u>	Part of Los Angeles Basin; east end of Hollywood Hills; and hills north of downtown Los Angeles	<ul style="list-style-type: none"> • <u>City of Los Angeles</u> • <u>South Pasadena</u>
<u>East</u>	Part of Los Angeles Basin; hills in northeast	<ul style="list-style-type: none"> • <u>Alhambra</u> • <u>Bell</u> • <u>Bell Gardens</u> • <u>Commerce</u> • <u>Cudahy</u> • <u>Downey</u> • <u>Huntington Park</u> • <u>Lynwood</u> • <u>Maywood</u> • <u>Monterey Park</u> • <u>Montebello</u> • <u>South Gate</u> • <u>Vernon</u> <p>Unincorporated Los Angeles County including community of <u>East Los Angeles</u></p>
<u>South</u>	Part of central and southern Los Angeles Basin extending south to Port of Los Angeles and east edge of the Palos Verdes Hills	<ul style="list-style-type: none"> • <u>Carson</u> • <u>Gardena</u> • <u>Lomita</u> • <u>Long Beach</u> • <u>Lynwood</u> • <u>Rancho Palos Verdes</u> • <u>Rolling Hills Estates</u> • <u>Torrance</u> <p>Unincorporated Los Angeles County including communities of:</p> <ul style="list-style-type: none"> - <u>Florence-Graham</u> - <u>West Carson</u> - <u>West Rancho Dominguez</u> - <u>Willowbrook</u>

East: Central Los Angeles area including the community of East Los Angeles in unincorporated Los Angeles County.

3. Environmental Setting

~~**West:** extends from the City of Gardena on the south to Griffith Park and the Santa Monica Mountains on the north, and bounded by the Pacific Ocean and the west District boundary on the west.~~

~~**North:** includes the San Fernando Valley, the northern part of the Santa Monica Mountains, and parts of the Santa Susana Mountains and San Gabriel Mountains.⁵~~

Superintendent's Intensive Support and Innovation Center

Approximately 145 schools from across the District are served by the Superintendent's Intensive Support and Innovation Center (ISIC).⁶ The mission of the ISIC is to ensure that every LAUSD site receives the support and guidance it requires toward maintaining a safe and caring environment that supports learning and high student achievement.

⁵ LAUSD. 2012, May. Educational Service Centers. http://notebook.lausd.net/pls/ptl/does/PAGE/CA_LAUSD/EDUCATIONAL_SERVICE_CENTERS/EDUCATIONAL_SERVICE_CENTERS_ESC_MAPS/ESC%20MAP_050712.PDF.

⁶ http://notebook.lausd.net/pls/ptl/ptl_apps.schoolguide.render

3. Environmental Setting Figure 3-1 Regional Location

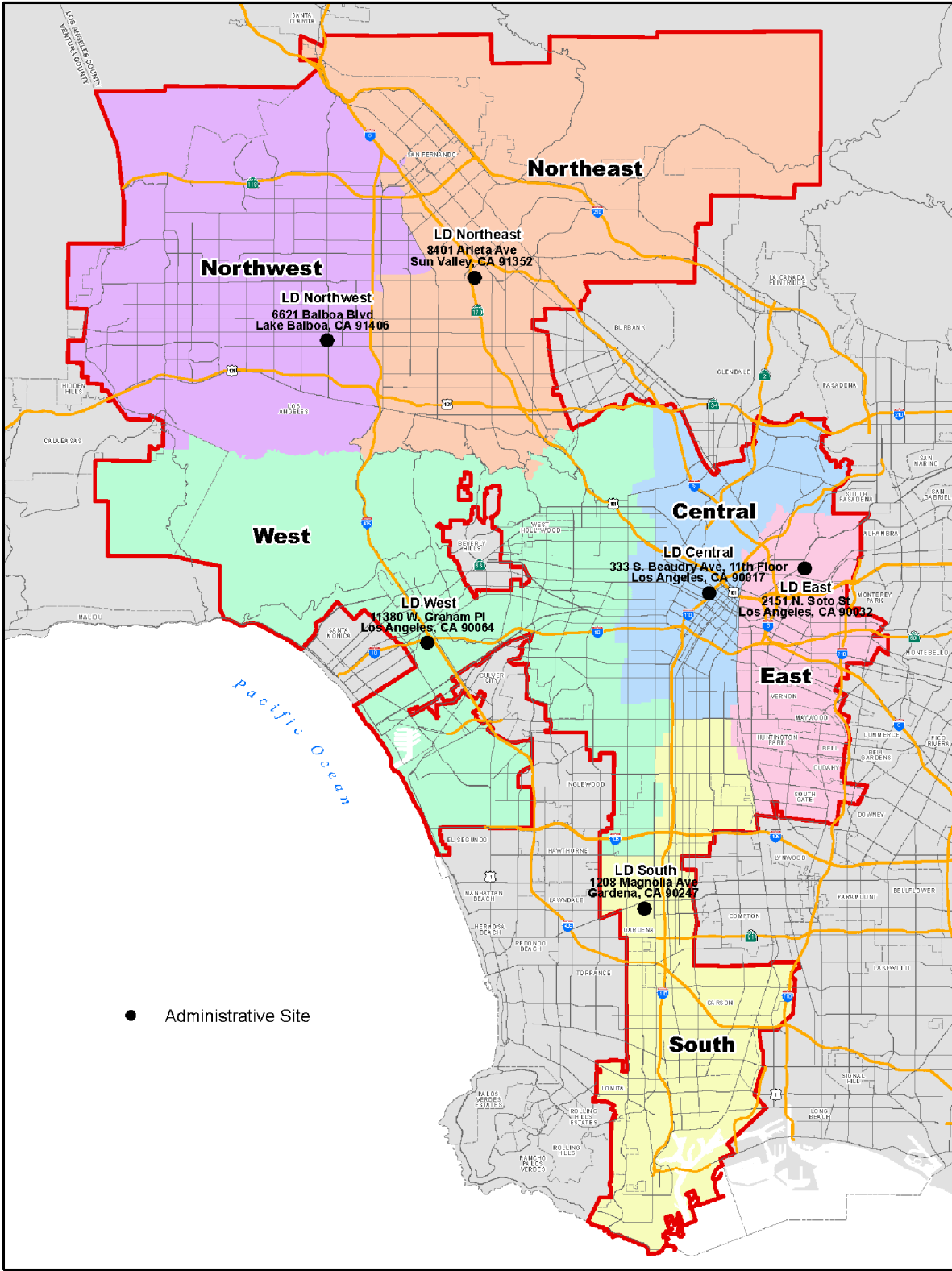


Source: LA County DRP, 2013; ESRI, 2014

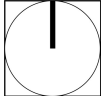
3. Environmental Setting

This page intentionally left blank.

3. Environmental Setting Figure 3-2 Local Vicinity



Source: Los Angeles Unified School District, 2015



3. Environmental Setting

This page intentionally left blank.

3. Environmental Setting

3.3.2 LAUSD Schools

District Enrollment

During the 2012–2013 school year, total LAUSD enrollment in grades K–12 was 655,494, including: 7

- 310,304 in grades K–5 (elementary school grades)
- 144,175 in grades 6–8 (middle school grades)
- 201,015 in grades 9–12 (high school grades)

Some schools extend from grades kindergarten to 8th; and some charter schools provide education in both middle school and high school grades.

Schools by City

The number of schools by city are listed in Table 3-1.

Table 3-1 Number of Schools in Each City

City	Schools
Bell	8
Bellflower	1
Carson	24
City of Industry	1
Cudahy	5
Culver City	3
Gardena	19
Huntington Park	28
Inglewood	1
Lomita	3
Long Beach	1
Los Angeles	1,141
Los Angeles County (unincorporated)	6
Maywood	6
Monterey Park	4
Rancho Palos Verdes	2
San Fernando	15
Santa Monica	1
South Gate	25
Torrance	3
West Hollywood	3
City not specified	9
Total	1,309

Source: California Department of Education (CDE). 2014, January 15. California Public Schools Directory. <http://www.cde.ca.gov/re/sd/>.
Note: This table includes 138 magnet centers on regular public school campuses.

⁷ California Department of Education (CDE). 2014, January 15. Dataquest. <http://data1.cde.ca.gov/dataquest/>

3. Environmental Setting

Schools by School Type and School Level

The LAUSD operates 1309 schools and centers as listed in Table 3-2 by school type and school level.

Table 3-2 LAUSD Schools Summary

School Type	Number of Schools in District
Primary School Centers Schools offering primary grades, ranging from kindergarten only to K-3. Most are smaller schools with enrollments of approximately 150 to 250 each.	18
Elementary Schools Traditional academic elementary schools. Most serve grades K-5 or K-6. Typical enrollments range from approximately 300 to 800.	457
Middle Schools Traditional academic middle schools. Nearly all serve grades 6-8. Most District middle schools range from about 800 to 1,600 students enrollment.	84
High Schools Traditional comprehensive high schools; most range between 1,500 and 3,000 enrollment.	103
Option Schools Small centers, mostly within comprehensive high schools, offering individualized instruction to students at risk of dropping out.	56
Magnet Schools	44
Magnet Centers Magnet programs housed on regular campuses	138
Span Schools Span 2 or 3 levels of traditional 3 school levels. Grade levels served include K-8, K-12, 6-12, and 7-12.	23
Special Education Schools Schools focused on educating students with disabilities, including learning disabilities and physical disabilities.	15
Charter Schools Schools operated under charter granted by LAUSD. School levels include elementary, middle, high, and span schools.	249
Community Adult Schools Curricula include occupational courses, academic courses, and English as a Second Language.	10
Regional Occupational Center/Program	1
Skills Centers	26
Early Education Centers	85
Total	1,309

Source: LAUSD. 2014, January 15. Master List of Schools. <http://www.laschools.org/new-site/my-school/>.

Primary School Centers

Schools offering primary grades, ranging from kindergarten only to kindergarten through 3rd grade. Most are smaller schools with enrollments of approximately 150 to 250 students.

Elementary School

Elementary schools typically serve students in kindergarten through 5th grade; enrollment at most range from 300 to 1,000 students, a few have up to 1,200 students. Schools range in size between 2 and 8 acres. The daily operational hours of elementary schools vary from school to school; however, staff and students arrive onsite

3. Environmental Setting

between 7:00 AM and 8:00 AM, and leave between 2:30 PM and 5:00 PM. Most schools offer after-school programs, which typically end between 4:00 PM and 5:00 PM. Students walk, bike, are driven, use public transportation or ride the school public transportation to and from school (Special Needs students may be transported in District provided vehicles). During the school year, elementary schools occasionally host nighttime events, such as fairs, performances, and “open houses.” These events generally occur on school nights between approximately 6:00 PM and 8:00 PM. Some of these events are for the entire student body, while others are grade specific. Selected elementary schools additionally house summer school programs, depending on District need and available capacity. The summer sessions typically run from mid-June to mid-July, Monday through Friday, from approximately 8:00 AM to 12:30 PM.

Middle School

Middle schools typically serve students in grades 6 through 8; enrollment at most range from 800 to 1,800 students. One middle school has a student enrollment of over 2,500. Schools range in size between 8 and 18 acres. Similar to elementary schools, middle school staff and students arrive on campus between 7:00 AM and 8:00 AM and leave between 3:00 PM and 5:00 PM. The students are normally dismissed at approximately 3:00 PM; however, many of the middle schools have after school programs, such as athletic activities, special-interest clubs, and extracurricular activities. Middle schools also have occasional nighttime events during the school year. Some of these events are campus-wide, and others are grade specific. Students walk, bike, are driven, use public transportation to and from school (Special Needs students may be transported in District vehicles).

High School

High schools serve students in grades 9 through 12; enrollment at most range from 500 and 2,500 students. Typical schools range in size between 20 and 30 acres. Small sites in dense urban areas can also accommodate a high school (e.g. 1,215 student campus on an 8 acre site).

The high schools generally operate from 7:00 AM to 5:00 PM. Similar to middle and elementary schools, students and staff arrive on campus between 7:00 AM and 8:00 AM, and depart between 3:00 PM and 5:00 PM. The students are dismissed at 3:00 PM, but high schools offer after-school programs such as special interest clubs and athletic activities. Operation of the high schools additionally includes periodic nighttime events, and some of the campuses house continuation high schools, adult education programs, and summer school that operate after 5:00 PM.

Students walk, bike, drive, are driven, use public transportation to and from school (Special Needs students may be transported in District vehicles). The overall proportion of students using a given mode of transportation is variable, and dependent upon a given school’s location and general demographic profile. Some of the high schools provide limited onsite student parking.

Span School

Span schools cover more grades than conventional elementary, middle, or high schools, which usually cover grades K–5, 6–8, and 9–12, respectively. Span schools typically cover grades K–8, 7–12, or K–12.

3. Environmental Setting

The daily operations of span schools vary from school to school. Span schools with multiple grade levels operate similarly to elementary, middle, and senior high schools; staff and students arrive on campus between 7:00 AM and 8:00 AM and leave between 2:30 PM and 5:00 PM. Many schools may offer after-school programs for the students, such as athletic activities, special-interest clubs, and extracurricular activities. Operations of span schools may also include periodic evening and nighttime events during the school year. Some of these events are campus-wide, and others are grade specific.

Students walk, drive, bike, are driven, use public transportation, and are bused to and from the schools. The overall proportion of students using a given mode of transportation varies depending on a given school's location and general demographic profile.

Option Schools

Option Schools provide instruction in a variety of settings, including small campuses, small classes, independent study, and instruction in home or hospital.⁸ Typical students are those who have dropped out of school, are at risk of not completing their education, pregnant minors, and students with certain disciplinary issues including expulsion. There are seven types of Option Schools each serving a different type of student need.

City of Angels K–12 Independent Study School

City of Angels School is an independent study school for students who are unable to attend a traditional classroom environment. The curriculum at City of Angels School is California-standards-based instruction. Students must meet a minimum of one hour per week with their assigned teacher and receive 30 hours of coursework to complete at home. Students can have concurrent enrollment in community college to receive high school and college credits. City of Angels has many sites throughout LAUSD. Through the City of Angels Virtual Academy, students complete online classes.

Pregnant Minor Schools

Pregnant minor schools consist of small campuses throughout the District. Their primary goal is to provide interim educational opportunities to expectant mothers so that they can continue their education and graduate. Schools provide counseling by school nurses, information on health and nutrition, and prenatal and infant care. Pregnant minor schools are at two campuses: McAlister High School and Riley High School, both in the central Los Angeles area.

Alternative School: Youth Opportunities Unlimited Alternative High School

The alternative school, Youth Opportunities Unlimited (Y.O.U.), is a small school for students between the ages of 14 and 21 who have not been enrolled in school for at least 40 days. The three primary focuses of the schools are educational development, employment training, and youth and family development. The school was developed as a model of community based, collaborative education between the U.S. Department of Labor, the City of Los Angeles, and the District.

⁸ LAUSD. 2014a, January 27. Option Schools. http://notebook.lausd.net/portal/page?_pageid=33,255549&_dad=ptl&_schema=PIL_EP.

3. Environmental Setting

Carlson Home/Hospital School

Instruction in the home or hospital is provided for eligible students in grades K–12 whose non-contagious temporary medical disability prevents attendance in regular day class for a limited period of time. The intent is to maintain continuity of the student’s instructional program during the interim period of disability. A home/hospital teacher provides instruction in courses correlated with the student’s school program to the maximum extent possible. It does not replace the regularly required instructional program. Instruction in the home/hospital commences when the attending physician authorizes service to begin, based upon the student’s ability to participate, and the parents authorize temporary transfer of educational duties.

Continuation High Schools

Continuation high schools are small campuses with low student-to-teacher ratios offering instruction to students between the ages of 16 and 18 who are deemed at risk of not completing their education. The goal of each student is to make up credit deficiencies and either be graduated from the continuation school or transferred back to traditional high school. Some continuation schools offer evening classes to serve high school students who are regularly employed 30 hours or more a week. The major emphases in the evening classes are occupational orientation and work experience while working towards graduation requirements. Continuation high schools are listed by Local District-ESG in Table 3-3.

Table 3-3 Continuation High Schools by Educational Service Center Local District

Central and East	Northwest and Northeast	South	West
Boyle Heights	Addams	Angels' Gate	Cheviot Hills
Central	Burke	Avalon	Ellington
Highland Park	Earhart	Eagle Tree	Owensmouth
Kahlo	Einstein	Hope	Patton
Monterey	Evergreen	Moneta	Phoenix
New Mark	Grey	Odyssey	View Park
Pueblo	Independence	Patton	Whitman
	Lewis	Rodia	Young
	London	San Antonio	
	Mission		
	Mt Lukens		
	Owensmouth		
	Rogers		
	Stoney Point		
	Thoreau		
	Wooden		

Source: LAUSD. 2014a, January 27. Options Schools. http://notebook.lausd.net/portal/page?_pageid=33,255549&_dad=ptl&_schema=PTL_EP.

3. Environmental Setting

Community Day Schools

Community day schools are small schools providing interim educational opportunities for K–12 students who have been expelled, are at high risk, or have been referred by probation, or a School Attendance Review Board. The goal of community day schools is to provide a challenging academic curriculum, develop social skills, and return students back to traditional schools. The District operates the following schools:

Table 3-4 Community Day Schools

School ^a	City or Community ^a	Educational Service Center/Local District ^b	Grade Levels
Aggeler	Chatsworth [Los Angeles]	Northwest	7–12
London Elementary	Valley Glen [Los Angeles]	Northwest	9–12
Alonzo	Los Angeles	West	7–12
West Hollywood	West Hollywood	West	7–12
Tri-C	Los Angeles	EastCentral	7–12
Ramona	Los Angeles	East	7–12
Secondary	Los Angeles	EastCentral	6–12
Johnson	Los Angeles	South	9–12
Johnson	San Pedro [Los Angeles]	South	7–12

Source: LAUSD. 2014a, January 27. Options Schools. http://notebook.lausd.net/portal/page?_pageid=33,255549&_dad=ptl&_schema=PTL_EP.

^a All community day schools are part of the Intensive Support and Innovation Center (ISIC)

^b Communities in the City of Los Angeles.

^c All community day schools are part of the Intensive Support and Innovation Center (ISIC), a district-wide educational service center based on types of services offered, not location.

Opportunity Schools

An opportunity school has a small campus serving students in grades 7–12 who are habitually truant, have irregular attendance, and exhibit other at-risk behaviors. This school offers specialized instruction, guidance and counseling, psychological services, and tutorial assistance to help students overcome barriers to learning. The District operates one Opportunity School at Ramona High School in East Los Angeles.

Magnet Schools

Magnet schools offer programs emphasizing a field of science, technology, art, or industry. Magnet school themes include business, communications/technology, enriched studies, foreign language, gifted/highly gifted, global awareness, humanities, law/government/police studies, medical careers, science/technology/engineering/math, and visual and performing arts. Magnet schools are on traditional school campuses at all three levels, and magnet schools are separate school campuses.

Special Education Schools

Special education schools educate students with disabilities such as learning disabilities, physical disabilities, including hearing and vision problems, social and emotional development issues; and serious or chronic medical conditions. Most special education schools offer grades pre-K–12, 7–12, or 9–12.

3. Environmental Setting

Charter Schools

Charter schools operate under charters granted by LAUSD. School levels include elementary, middle, high, and span schools. A charter is granted by the LAUSD Board of Education and approved by the state for a period of up to five years. Charter schools are open to any child who wishes to attend, from any part of the state. Although certain attendance preferences may be given, enrollment is conducted by lottery. There are two types of charter schools in the district: Conversion and Start-up.

- A conversion charter is an existing district school that later becomes a charter.
- A start-up is a charter school that is created “from scratch” by any member of the public—educators, parents, foundations, and others.

Charter schools include schools of all levels - elementary, middle, and high schools and span schools serving various ranges of grade levels. Most charter school enrollments range between 200 and 600, less than most traditional District schools.⁹

Community Adult Schools

Community adult schools’ curricula include occupational courses, academic courses, and English as a Second Language. Adult schools serve adults and in- and out-of-school teens and are typically located on an existing school campus.¹⁰

Occupational Centers and Skills Centers

Occupational centers and skills centers, operated by the District’s Division of Adult and Career Education, offer career and technical education as well as classes in a range of academic subjects. Career and technical education is offered for 15 industry sectors.¹¹

Early Education Centers

Early education centers are preschool programs that address the social-emotional, physical, and cognitive needs of the population served. Early education centers serve children aged 2 through second grade. Families must be at or below 75 percent of state median income, and the family or child must have a qualifying need—such as employment, training, seeking and employment. Early education centers usually operate 6:00 AM to 6:00 PM Monday through Friday.¹²

⁹ LAUSD. 2014, January 27. About Charter Schools. http://notebook.lausd.net/portal/page?_pageid=33,205131&_dad=ptl&_schema=PIL_EP.

¹⁰ LAUSD. 2014, January 27. About DACE. http://adulthood-lausd-ca.schoolloop.com/cms/page_view?d=x&piid=&vpid=1361785139161.

¹¹ LAUSD. 2014, January 27. Career Technical Education (CTE). <http://adulthood-lausd-ca.schoolloop.com/Perkins>.

¹² LAUSD. 2014, January 27. Early Education. http://notebook.lausd.net/portal/page?_pageid=33,181459&_dad=ptl.

3. Environmental Setting

Civic/Community Centers

In compliance with Education Code 38131 (b) Civic Center Act, every school in the District makes facilities available for various nonprofit community organizations and members of the public to use for supervised recreational activities, meetings, and public discussions. Schools are available during designated hours when regular school activities will not be disrupted. School facilities that can be used are gymnasiums, play fields, stadiums, auditoriums, multipurpose rooms, cafeterias, and classrooms. Designated year-round hours for civic center use start two hours after the close of school, and are typically 6:00 PM until 9:30 PM on weekdays, 8:00 AM until 9:30 PM on Saturday, and 12:00 PM until 5:00 PM on Sundays. No civic center use is allowed at elementary schools on Sundays. A permit from the LAUSD is required to use school facilities.¹³

School Calendar

The LAUSD operates on a single-track calendar, which runs from mid-August to early June. The traditional single-track school schedule is used by all schools but one. Summer sessions generally runs from June through July Standard LAUSD holidays include Labor Day, Veterans Day, Thanksgiving holiday, winter recess, Dr. Martin Luther King Jr. Birthday, President's Day, spring break, and Memorial Day.¹⁴

Staff

The District's staff in the 2013–2014 school year includes 26,364 K–12 teachers, 27,813 total teachers, 2,135 administrators, 3,657 other certificated support personnel, and 26,534 classified personnel, for a total of 60,139 employees.¹⁵

3.3.3 General Plan and Zoning

General Plan and zoning designations on parcels not owned by the District varies by jurisdiction and by location. Although most school property is owned by the District, the underlying city or county land use designations can be residential, industrial, commercial or other. The LAUSD Board of Education has, by resolution, exempted many schools from otherwise applicable local zoning regulations, as allowed under State law under Government Code Section 53094.

3.4 ASSUMPTIONS REGARDING CUMULATIVE IMPACTS

Cumulative impacts are defined as “two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts.”¹⁶ Cumulative impacts are the change caused by the incremental impact of the project evaluated in the EIR together with the incremental impacts from closely related past, present, and reasonably foreseeable probable future projects. Cumulative

¹³ LAUSD. 2014, January 28. Civic Center Permit. <http://btb.lausd.net/Programs/StudentAuxiliaryServices/CivicCenterPermit.aspx>.

¹⁴ LAUSD. 2014, February 10. Single Track Instructional School Calendar 2013-2014. <http://home.lausd.net/ourpages/auto/2013/1/9/46336778/Single%20Track%202013-2014%20Bd%20Approved%20--%202-12-2013.pdf>.

¹⁵ Los Angeles Unified School District (LAUSD). 2013, October 9. Los Angeles Unified School District Fingertip Facts 2013-2014. http://notebook.lausd.net/pls/ptl/docs/PAGE/CA_LAUSD/LAUSDNET/OFFICES/COMMUNICATIONS/COMMUNICATIONS_FACTS/11-12FINGERTIPFACTSREVISED.PDF.

¹⁶ 14 CCR Section 15355

3. Environmental Setting

impacts can result from individually minor but collectively significant projects taking place over a period of time.

Section 15130 of the CEQA Guidelines states that cumulative impacts shall be discussed when the project's incremental effect is cumulatively considerable.¹⁷ It further states that this discussion shall reflect the level and severity of the impact and the likelihood of occurrence, but not in as great a level of detail as that necessary for the project alone.

The information utilized in an analysis of cumulative impacts comes from one of two sources:¹⁸

- A. A list of past, present, and probable future projects producing related cumulative impacts, including, if necessary, those projects outside the control of the agency.
- B. A summary of projections contained in an adopted general plan or related planning document, or in a prior environmental document which has been adopted or certified, which described or evaluated regional or area-wide conditions contributing to the cumulative impact.

The cumulative impact analysis contained in this EIR uses Method B. The proposed project consists of a District-wide program that covers individual projects that would be implemented well into the future. This EIR has a District-wide program-level analysis for the SUP and no project locations or specific projects have been identified. Consistent with 14 CCR Section 15130(b)(1)(B), this EIR analyzes the environmental impacts associated with cumulative development pursuant to future development that would be planned, constructed, and operated under the SUP. As a result, this EIR addresses the cumulative impacts of school-related development within the entire 710-square-mile school district. District-generated student projections are based on the projections of the County and city housing and employment.

In most cases, such as traffic and historic resources, the potential for cumulative impacts would be contiguous with the District boundary, since all schools and students attending those schools reside within the District. Other impacts are site-specific, such as aesthetics, and geology and soils; and still others may have impacts outside the district boundaries, such as air quality. Each of the environmental topics in this EIR assess the types of projects that may be implemented under the SUP and assumes that more than one may take place at the same time.

Please refer to sections in Chapter 5, *Environmental Analysis*, for a discussion of the environmental impacts associated with cumulative development pursuant to implementation of the SUP.

¹⁷ 14 CCR Section 15065 (a)(3) "Cumulatively considerable" means that the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.

¹⁸ 14 CCR Section 15130 [b][1]

3. Environmental Setting

This page intentionally left blank.

4. Program Description

4.1 LOCATION

The School Upgrade Program (SUP or proposed program) covers school projects within the entire Los Angeles Unified School District (District or LAUSD), which is the largest public school system (most students) in California and the second largest in the United States.

The District covers 710 square miles and encompasses most of the County of Los Angeles, along with all or portions of 31 cities and unincorporated areas of Los Angeles County (refer to Chapter 3 for detailed description of the project location)

4.2 BACKGROUND

LAUSD currently has a K-12 enrollment of approximately ~~700,000~~ 651,322 students, including charter school students. ~~In addition,~~ The District also serves approximately ~~255,700~~ 697 Adult Education students. To serve all these students, the District operates or funds 1,270 primary, elementary, middle, and high schools, along with special education, charter, magnet and other specialized schools and work centers.¹

While enrollment is more stable today, ~~the District,~~ up to the late-1990s the District ~~had experienced decades of increased enrollment.~~ This combined with a lack of ~~the development of~~ new schools and deficiencies in the funding of maintenance and repair of existing schools created overcrowding and a ~~crisis in educational facilities and overcrowding crisis.~~

From 1980 to 2002, LAUSD student enrollment grew by more than 200,000 students—that number alone is larger than any other school district in California. For 30+ years there was very little funding to invest in new school facilities, and increased student attendance and overcrowding was addressed by:

- ~~placing portable classrooms on school campuses~~
- ~~instituting multi-track calendars~~
- ~~busing students across the district to less crowded schools.~~

¹ LAUSD, 2008, Measure Q, page 2.

http://www.lavote.net/VOTER/PDFS/ELECTION_RELATED/11042008_MEASURE_Q.pdf LAUSD Fingertip Facts 2014-15
http://www.lavote.net/VOTER/PDFS/ELECTION_RELATED/11042008_MEASURE_Q.pdf LAUSD Fingertip Facts 2014-15, Office of Communications, December 2, 2014.
<http://www.HOME.LAUSD.NET/OURPAGES/AUTO/FINGERTIP%20FACTS%2014-15-FINAL.PDF>.

4. Program Description

This practice further stressed aging and deteriorating school infrastructure at existing schools² and had a direct negative impact on students' academic performance and quality of life. This impact is described in detail in a number of recent studies and reports by academic professionals. By 2001, over 123,000 more students were enrolled in the District than it had two-semester seats for them to occupy.³ More than 15,000 students could not attend their neighborhood schools due to overcrowding and had to be bused to other campuses, sometimes more than an hour away. Over 354,000 students attended schools that could only accommodate their enrollment through the use of multi-track, year-round calendar known as three-track⁴ (Concept 6) or four-track (called 90/30).⁵

In 1997, LAUSD embarked on an unprecedented capital improvement program that has grown to a total budget of ~~\$27 billion dollars~~—the largest new school construction and modernization program in the history of the United States. This process began with the passage of Proposition BB (1997)⁶ and subsequently Measures K (2002),⁷ R (2004),⁸ and Y (2005),⁹ which were focused on addressing deteriorated and overcrowded conditions at schools and on providing students with the opportunity to attend a neighborhood school on a traditional two-semester calendar by constructing new schools and adding permanent seats to existing schools.

In 2000, the District initiated the New School Construction Program. In 2008, it was anticipated that at the completion of the New School Construction Program, there would still be approximately 200,000 students in portable classrooms and the majority of the District's schools would still be much larger than the State average. Therefore, the District put forth Measure Q (2008),¹⁰ "The Safe, Healthy Neighborhood Schools

²The School Upgrade Program PPT. Prepared by Audit, Budget & Facilities Committee. January 9, 2014. <http://laschoolboard.org/sites/default/files/SchoolConstructionBondSchoolUpgradeProgramOverview.pdf>

³See "Declaration of Gordon Wohlers," dated September 5, 2001, prepared and submitted in *Godinez v. Davis*, Los Angeles Superior Court, Case No. BC227352; Mitchell, "Segregation in California's K-12 Public Schools: Biases in Implementation, Assignment, and Achievement with the Multi-Track Year-Round Calendar," expert report prepared for plaintiffs in *Williams v. State of California*, San Francisco Superior Court, Case No. 312236; expert report of Glen I. Earthman prepared for plaintiffs in *Williams*; expert report of Ross E. Mitchell; Expert Report of Jeannie Oaks prepared for plaintiffs in *Williams*.

⁴Under a three-track year-round schedule, the student body was divided into three groups; two groups attend school at the same time while one group is on vacation. The Concept 6 calendar had 163 days of instruction, with extended school days that made it equivalent to the 180 normal-length days of instruction required by the state. School hours are typically from 7:30 AM to 3:30 PM; Monday through Friday, year-round.

⁵Under a four-track year-round schedule, three tracks started after the July 4th, and one track started in August. The school year ran from July to the last week in June and was 180 days long for each track. The preschool program and kindergarten classes were and are currently half-day programs, held in the morning and the afternoon.

⁶ Proposition BB is a school bond measure that authorizes LAUSD to use \$2.4 billion in bonds for the construction of new schools and the repair and modernization of existing schools through the district to improve local schools and relieve classroom overcrowding. The ballot measure was approved in April 1997 by 71% of voters.

⁷ Measure K "Safe Healthy Neighborhood Schools Act" is a school bond measure that authorizes LAUSD to issue \$3.35 billion in bonds for repair and renovation of existing schools and to build neighborhood schools to improve local schools and relieve classroom overcrowding. The measure was passed in November 2002 by 64% of voters.

⁸ Measure R "Safe and Healthy Neighborhood Schools Improvement Act of 2004" is a school bond measure that authorizes LAUSD to issue \$3.87 billion in bonds to continue repair/upgrade of aging classrooms and build neighborhood schools. The measure was passed in March 2004 by 63% of voters. <http://www.laschools.org/bond/faq>.

⁹ Measure Y "Safe and Healthy Neighborhood Schools Repair and Construction Measure of 2005" is a school bond measure that authorizes LAUSD to issue \$3.985 billion in bonds to continue repair/upgrade of aging classrooms and to build new neighborhood schools. The measure was passed in November 2005 by 66% of the voters. <http://www.laschools.org/bond/faq>.

¹⁰ Measure Q is a school bond measure that authorizes LAUSD to issue \$7 billion in bonds to continue repair/upgrade of aging classrooms. The measure was passed November 2008 by 69% of the voters. School Construction Bond Oversight Committee <http://www.laschools.org/bond/faq>.

4. Program Description

Measure of 2008” as a funding mechanism to continue the New School Construction Program and to fund school upgrades and repairs.¹¹

The current Bond Program¹² began 17 years ago to fund District programs that improve student learning environments by addressing deteriorated and overcrowded conditions of its schools. Accomplishments of the District programs include:

- 130 of 131 new K–12 school projects completed
- 65 of 65 new K–12 addition projects completed
- No schools operating on Concept 6 calendar in compliance with the Williams Settlement Agreement
- No schools operating on a multi-track calendar
- Full-day kindergarten program implemented District-wide
- More than 23,000 modernization projects completed
- Invested in repairing and modernizing existing school facilities

The District has constructed and improved millions of square feet of school facilities, which require ongoing maintenance and repair to preserve their utility and to protect the District’s and taxpayers’ investment. The District priority now is to upgrade existing facilities and provide additional facilities to achieve the educational benefits of smaller learning environments.¹³ Despite \$19.5 billion invested in constructing new schools and repairing and modernizing existing school facilities, the District has more work to do:

- Still unmet capital needs District-wide.
- Many facilities do not align with educational needs.
- Schools are aging, deteriorating, and need to be maintained.
- Operational funding for deferred maintenance has not kept up with capital need.
- Overcrowding severely increased wear and tear on buildings and decreased their life expectancy.

Student Demographic Trends

State

Over the next ten years California will experience a growth in public K-12 enrollment of 0.7 percent to reach a total of over 6,264,000 students. This growth will result in an additional 45,800 students by 2022-23, occurring mostly in middle and high school enrollment. Elementary enrollment is expected to remain fairly steady with a slight uptick by 2022-23 as births continue to remain flat.

¹¹ LAUSD Facilities Services Division. <http://www.laschools.org/new-site/project-execution/>.

¹² Includes Proposition BB (1997) and Measures K (2002), R (2004), and Y (2005); does not include Measure Q (2008). See <http://www.laschools.org/bond/faq>.

¹³ LAUSD, 2008, Measure Q, page 2. http://www.lavote.net/VOTER/PDFS/ELECTION_RELATED/11042008_MEASURE_Q.pdf.

4. Program Description

County

The largest increases in county enrollment by 2022-23 are expected in Riverside (over 70,000 students), Kern (over 30,000 students), and San Bernardino (over 23,000 students). The biggest declines in enrollment are expected in Los Angeles and Orange Counties. Graduates are expected to decrease in the short term to a low of 402,000 in 2016-17 but rise to 424,000 by 2022-23. The biggest increases in graduates are expected in Santa Clara, Kern, and Riverside counties, each of which will have over 2,000 additional graduates in 2022-23, while graduates in Los Angeles County are expected to decline by around 10,000 over this time period due to declining enrollments.¹⁴ From 1990 to 2000, the number of children in under age 10 had grown by 11.4%, but after 2000 the numbers of children turned steeply downward, falling 16.9% by 2010. The projection for the current decade is a further decline of 14.6% by 2020, with only a small further decline (4.0%) by 2030. Birth data show this decline commenced well prior to the onset of the recession in 2007, and in fact births in Los Angeles County in 2011 are fully 35% lower than in their peak year of 1990.¹⁵

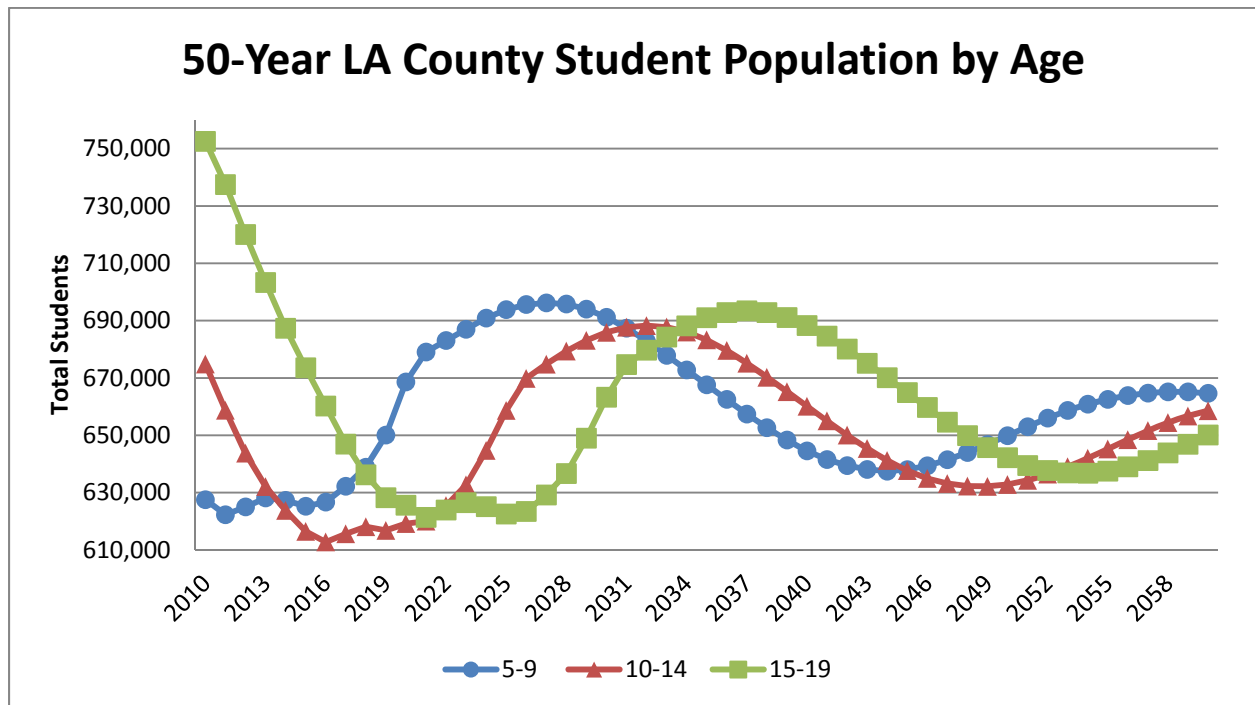
Over the 50-year time span from 2010-2060, Los Angeles County student age population (age 10-19) is projected to decline by 14 percent while students age 5-9 are expected to increase by 6 percent (see graph below; data can be found in Appendix C of this EIR).¹⁶ Overall total student population in Los Angeles County is projected to decline by 4 percent.

¹⁴ California Department of Finance. Public K–12 Enrollment and Graduate Projections. California Public K–12 Graded Enrollment and High School Graduate Projections by County — 2013 Series. <http://www.dof.ca.gov/research/demographic/reports/projections/k-12/>.

¹⁵ Dowell Myers and John Pitkin. 2013. The Generational Future of Los Angeles: Projections to 2030 and Comparisons to Recent Decades. Produced by the Population Dynamics Research Group, Sol Price School of Public Policy, University of Southern California. Text and supporting materials are published at: <http://www.usc.edu/schools/price/research/popdynamics>

¹⁶ California Department of Finance. Student Age Population Breakdown: All Los Angeles County. <http://www.dof.ca.gov/research/demographic/reports/projections/P1/>.

4. Program Description

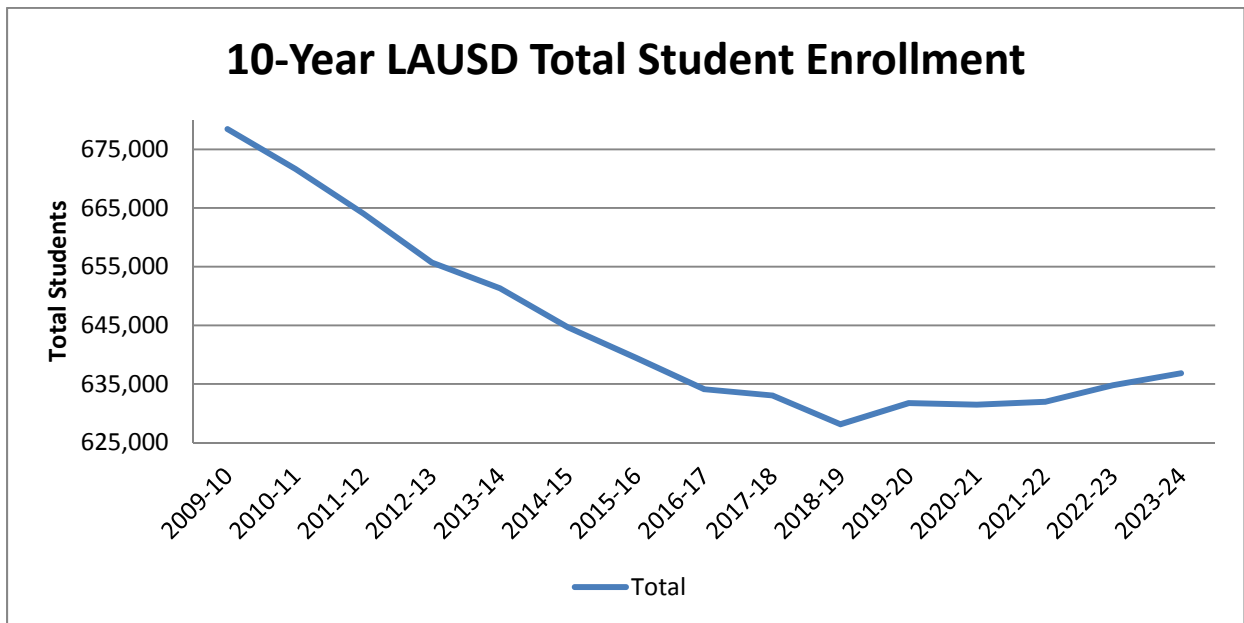


Source: California Department of Finance. Student Age Population Breakdown: All Los Angeles County. <http://www.dof.ca.gov/research/demographic/reports/projections/P-1/>.

For LAUSD student enrollment peaked in 2002–03 at 746,831, and has declined each year since. This was due to several factors, including the declining birth rates and the increasing cost of living, including housing.¹⁷ During the 2014–15 school year, 671,648 K–12 students were enrolled in the District—down 10.3 percent from the District’s peak in 2002. Between 2010 and 2014, the level of student enrollment has started to leveled out—down only .05 percent. This trend will continue until about 2019 when total district enrollment will start to increase slightly. Over the next 10 years LAUSD projections show that total student enrollment will decrease by 2 percent by 2024 (see graph below; data can be found in Appendix C of this EIR). Although some grades will see a significant increase, specifically a 10.6 percent in Kindergarten students, overall the LAUSD will have fewer students than they currently have in 2014. This trend coincides with the Department of Finance projection for Los Angeles County which is expected to see an overall decline of about 1 percent by 2024.

¹⁷ Superintendent’s Final Budget 2013–2014. LAUSD Budget Services & Financial Planning Division. June 18, 2013. <http://laschoolboard.org/sites/default/files/LAUSD2013-14FinalBudget.pdf>.

4. Program Description



4.2.1 Facilities Services Division

Facilities Services Division (FSD) is responsible for the overall provision, planning, design, construction and maintenance of school facilities in the District. The Office of Environmental Health and Safety (OEHS) is responsible for implementing environmental and site assessment reviews for construction projects, including those as defined by CEQA. All bond funds are managed through FSD.— The Bond Program (current and future) funds projects identified in four LAUSD FSD Programs: New School Construction Program, Repair and Modernization Program, Joint Use/Innovation Fund and Charter Facilities Program, and the Capital Improvement Program. Each of these programs is described under “Program Components,” below.

4.2.1.1 FSD MISSION

The FSD’s mission is to provide healthy and safe learning environments that support educational achievement throughout the District. The FSD accomplishes this mission by building new school projects, repairing and modernizing existing school facilities, and promoting joint planning with local communities.¹⁸

4.2.1.2 FSD GOALS

The FSD goals are to upgrade existing schools to: align with instructional requirements and vision; be safe and secure; and have building systems that are sound and efficient.

¹⁸ LAUSD, 2012, “All Youth Achieving” 2012–2015 Strategic Plan, Page 4.

4. Program Description

4.2.1.3 GUIDING PRINCIPLES

Guiding principles for the FSD's programs are:

- Sustainable school projects driven by educational objectives and opportunities to increase instructional resources.
- Integration of District-wide goals in the planning, design, and delivery of projects.
- Schools designed to operate as centers of their communities, including community use of school facilities after school hours and joint use partnerships.
- Community engagement at each step of the process through the development of strong relationships with contractors, city and state agencies, and community stakeholders.
- Good client relationships with business partners to position FSD as an “owner of choice” for contractors and small businesses who help achieve their goals.
- Individual accountability at all levels of the organization in order to meet program goals with measurable results and maintain safe project sites at all times.
- Program management guided by the measurement of actual versus planned targets.
- Quality assurance and quality control at all project stages, including identification of best practices.
- Comprehensive, timely, and accurate information through easy-to-read and focused reporting.

Strategic Execution Plan. The SEP, ~~which is published annually, includes has an annual~~ a summary of all ~~the specific projects being implemented by planned the District.— These include projects that are funded by federal, state and local funds under the four FSD programs.~~

The board of education (Board) at least annually conducts an assessment of the condition of District facilities and identifies the ongoing needs to properly maintain and preserve them.⁴⁹ With the active participation of the community—including the continued supervision of the independent LAUSD School Construction Bond Citizens' Oversight Committee—and with the expertise of architectural, engineering, and urban-planning professionals, the Board annually develops and revises the SEP. The SEP outlines individual projects for building new schools and rebuilding, repairing, replacing, upgrading, and modernizing District facilities, and it constitutes the plan ~~road map~~ for delivering ~~state-of-the-art modern~~ classrooms and support facilities. It describes the District's goals of creating clean, safe, and inspired learning environments and new school buildings throughout neighborhoods of Los Angeles County.²⁰

⁴⁹ LAUSD, 2008, Measure Q, page 2. http://www.lavote.net/VOTER/PDFS/ELECTION_RELATED/11042008_MEASURE_Q.pdf

²⁰ LAUSD, 2008, Measure Q, page 3. http://www.lavote.net/VOTER/PDFS/ELECTION_RELATED/11042008_MEASURE_Q.pdf

4. Program Description

Capital Needs Assessment: Master Planning and Facilities Condition Assessment. To determine the schools with the most need, the District FSD conducts a capital needs assessment (CNA). The CNA process begins with a Master Planning and Facilities Condition Assessment, which in turn begins with surveys of the nearly 600 existing campuses in the District.²¹ Surveys are completed for individual campuses within a “high school complex,” which typically includes one District high school campus and several middle and elementary schools that feed into the high school.²² For each survey, existing facilities and demographics data for the school are collected and used, as are onsite reviews. The information gathered is reviewed to verify school configurations, assess physical conditions, document current uses, and identify physical and instructional needs. Draft survey reports are reviewed with key school site, local area, and central District staff. Together with recent aerial photographs, final survey reports are completed.

In August 2012, LAUSD’s Maintenance and Operations branch began performing Facilities Condition Assessments. These assessments are performed by teams of skilled trades personnel to determine the remaining service life of over 1,200 different types of school building components. The Facilities Condition Assessments take about two years.

As condition assessments are completed, the information is used in conjunction with master planning surveys. The combined effort augments the preparation of conceptual master plans that propose solutions to major school deficiencies, instructional needs, and enrollment projections. The conceptual planning process considers removing temporary or underutilized buildings, replacing obsolete structures, modernizing existing facilities, and recapturing open space. In addition, planning takes into account possible reductions in energy and water consumption, opportunities for joint use development, and input from key stakeholders in the school community. The facilities master plans pave the way for the development and execution of future capital projects that will modernize the District’s aging and deteriorating existing campuses and further reduce school overcrowding. Master plans have been completed for all school sites except 15 special education centers, which are progressing.

4.3 SUP STATEMENT OF OBJECTIVES

The SUP is a \$7.8 Bbillion capital program to modernize schools in the most critical physical condition. Despite the significant investments in schools made to address overcrowding and disrepair schools, the District still faces the need to make up for decades of facilities neglect.— Almost half of the District’s buildings were constructed at least 50 years ago, nearly 800 of the buildings were constructed more than 75 years ago, and 14 percent of newly constructed schools are at least ten10 years old or more.

Approximately \$4 Bbillion of the \$7.8 Bbillion allocated for projects under the SUP would be targeted for projects that will renovate, modernize, and/or reconfigure school sites.— There will be significant unmet need

²¹ LAUSD Facilities Services Division, 2013, Strategic Execution Plan, Page 11. <http://www.laschools.org/new-site/sep/>.

²² Location-specific projects included in Appendix A of Measure Q. <http://www.laschools.org/bond/faq>.

4. Program Description

for facilities upgrades beyond the expenditures currently allocated for the SUP.— As such, projects must be prioritized based on criteria focusing on facilities with the most critical physical needs.²³

Goals of the objectives for the SUP are to ensure:

- Physically safe schools should be physically safe.
- Sound and efficient school building systems should be sound and efficient.
- School facilities should align of school facilities with instructional requirements and vision.²⁴

— Master Planning activities and facility site assessments have been conducted for District schools over the last several years. These activities have resulted in the identification of capital needs at every District school campus. One tool developed by the District for reporting on the conditions of each school is the Facilities Condition Index (FCI). This provides a scale for assessing individual campus needs as well as presenting needs relative to other campus site and school building deficiencies.

— Projects Identified Based on Physical Characteristics

— Subsequent to adoption of a prioritization methodology by the Board of Education, projects will be identified based on the following characteristics:

— Critical facilities conditions as defined by the Facilities Condition Index.

— Buildings identified for seismic evaluation.

— High proportion of classrooms in portable buildings.

— Inadequately sized core facilities such as food services, play space, multi-purpose rooms, auditoriums and libraries.

— Lack of secured physical entryways.

— Site density.

²³ “Prioritization Methodology for Identifying and Defining Major Renovation, Modernization, and/or Reconfiguration Projects?” Memorandum from Superintendent Ramon C. Cortines to Members, Board of Education, November 3, 2014.

²⁴ Based on “Proposed Facilities Prioritization Methodology for Future Modernization Projects?” presentation to Bond Oversight Committee, November 20, 2014.

4. Program Description

~~— Framework for Individual Project Scoping~~

~~— School sites identified for renovation, modernization and/or reconfiguration, would have their individual project scopes be “defined” based on the following framework assumptions:~~

~~— Projects will address the most critical physical conditions at a school to ensure a safe learning environment.~~

~~— Buildings identified for seismic evaluation.~~

~~— Buildings and building systems/components that have been identified as being in critical condition by the Facilities Condition Assessment.~~

~~— Project will improve the functional adequacy of buildings in a critical physical condition.~~

~~— Projects should also consider any projected changes in demographics for a school’s resident students.~~

~~— More than 200 projects are already in development to address critical repairs throughout the District. There is also funding targeted for charter school facilities, special education facilities, school food services facilities, early education facilities, adult education facilities, afterschool/partnership facilities, school buses, Inspector General oversight, technology upgrades and for other priority projects.²⁵~~

~~— Adoption of a prioritization methodology for the SUP by the District’s Board of Education is anticipated in early 2015. This Program EIR would be applicable to all capital project activities currently in planning or design, and all future projects developed and added to the District’s Strategic Execution Plan (SEP). Further description of SUP program components and project types are included in section 1.4 of this Executive Summary.~~

~~■~~

The following objectives have been established for the School Upgrade Program (SUP) and will aid decision makers in their review of the project and associated environmental impacts:

²⁵ ~~“Prioritization Methodology for Identifying and Defining Major Renovation, Modernization, and/or Reconfiguration Projects” Memorandum from Superintendent Ramon C. Cortines to Members, Board of Education, November 3, 2014. Cortines Memorandum, November 3, 2014.~~

4. Program Description

- ~~Repair aging schools and improve student safety~~
- ~~Upgrade schools to modern technology and educational needs~~
- ~~Create capacity to attract, retain and graduate more students through a comprehensive portfolio of small, high quality Pre-k through adult schools~~
- ~~Promote healthier environment through green technology²⁶~~

4.4 SUP COMPONENTS

The SUP is the next phase of the District's bond program to build, modernize, and repair school facilities to improve student health, safety, and educational quality. The SUP does not have specific phases; it is an ongoing program that will continue well into the future.

The SUP identifies overarching goals and principles, funding sources, and specific categories of need and spending targets. The SUP establishes the framework that will build, upgrade, build, and repair school facilities. ~~The purpose of the SUP is to reflect the intent, goals, and objectives of the four FSD programs:~~

- ~~New School Construction Program~~
- ~~Repair and Modernization Program~~
- ~~Joint Use/Innovation Fund and Charter Facilities Program~~
- ~~Capital Improvement Program~~

~~The four FSD programs are now packaged into the overall SUP. The FSD programs were established between 1997 and 2010 and have varied programmatic goals and scopes of work. Each of the four FSD programs is described in detail below. The District is currently implementing the four FSD programs—capital projects with funding from Measures R and Y,²⁷ the previously established program reserve, and interest earned on state bond cash balances. Measure Q funding will be allocated for future projects to continue facility improvements and is the primary source of funding for the SUP.²⁸~~

~~Although the four FSD programs are not new and thousands of projects have already been completed under each, the The Program EIR-CEQA analysis for the SUP is being conducted prepared at this time now because Measure Q funds are becoming available through the District's bond sales program and the prioritization methodology and project planning are nearly complete.— five years have passed since the “2008 Bond Package Summary”²⁷ was adopted by the Board and Measure Q was approved by voters. Since 2008, when Measure Q was adopted by the Board and approved by voters, Over this time, new information about the condition of school facilities is has become available.—, because eCampus surveys and master plans have been completed~~

²⁶ 2008 Bond Package Summary.

²⁷ Proposition BB and Measure K funds have been exhausted.

²⁸ LAUSD Facilities Services Division, 2013, Strategic Execution Plan, Page 1.

4. Program Description

for all existing campuses except 15 special education centers, and Facilities Condition Assessments are in the process of being completed. Based on the surveys, school needs have changed. The SUP serves as an updated and restructured version of the “2008 Bond Package Summary” for capital planning purposes and promotes a holistic, comprehensive, and efficient approach to developing and executing District projects.

4.4.1.1 MEASURE Q

Measure Q, passed November 2008, ~~was is~~ a school bond measure that authorized LAUSD to issue \$7 billion in bonds to continue repair and upgrade of aging classrooms. This measure will provide funding for implementation of the SUP.— This includes the next round of funding to repair and modernize existing schools, replace bungalows with permanent classrooms, abate asbestos hazards, upgrade fire and safety systems, expand early-education facilities, and provide sufficient core facilities at hundreds of schools. These projects will also help the District satisfy court-mandated compliance under the Williams Settlement.²⁹ They will also enable the District to construct classroom seats needed to implement Quality Education Investment Act (QEIA)³⁰ class size reductions, and facilities for special education students under the Chanda Smith ~~consent Consent decree-Decree~~ (1996) and Modified ~~consent Consent decree-Decree~~ (2004),³¹ and others.

Projects designed to achieve the above objectives and other goals~~The list of typical projects below will be prioritized and incorporated into the SUP based on a prioritization methodology adopted by the board of education and project scoping efficiencies allocated to the four FSD programs following completion of the CNA and Board approval of the funding.— For instance, multiple program objectives may be packaged into a single modernization project, or achieved through multiple projects at the same school campus.— Typical projects include those listed below.~~

Safety, Earthquake, Emergency, Fire-Prevention

- Renovate and replace school buildings to ensure current earthquake safety standards are met

²⁹ Williams case settlement (2004) eliminated the LAUSD use of the Concept 6 calendar. The Eliezer Williams, et al., vs. State of California, et al. (Williams) case required all students equal access to instructional materials, safe schools, and quality teachers. (<http://www.cde.ca.gov/eo/ce/wc/wmslawsuit.asp>)

³⁰ On September 29, 2006, The Governor signed Senate Bill (SB) 1133 (Chapter 751, Statutes of 2006). The legislation establishes the Quality Education Investment Act (QEIA) of 2006 for the purposes of implementing the terms of the CTA, et al. v. Schwarzenegger, et al. settlement and discharges the outstanding balance of the maintenance factor regarding Proposition 98 funding that was due, but not provided in fiscal years 2004-05 and 2005-06. The Quality Education Investment Act provides approximately \$3 billion which would authorize school districts and other local educational agencies to apply for funding to allocate to elementary, secondary and charter schools that are ranked in either decile 1 or 2 as determined by the 2005 Academic Performance Index (API) base. [API scores are sorted from the highest to the lowest, by school type, and divided into 10 equal ranks (i.e., deciles)].

The appropriations begin in fiscal year 2007-08 and continue through 2013-14. School districts will receive approximately \$268,000,000 in fiscal year 2007-08 and \$402,000,000 for each fiscal year thereafter until 2013-14. Schools that are funded under the High Priority Schools Grant Program (HPSGP) that met or are meeting the program requirements of Education Code Section 52055.650 are eligible to receive funding under both the QEIA and HPSGP, providing the school meets all accountability requirements of both programs. CDE. <http://www.cde.ca.gov/ta/lp/qe/>.

³¹ The Chanda Smith consent decree was reached in 1996; it is an agreement requiring Los Angeles Unified School District to identify and educate special education students in a manner consistent with state and federal special education and civil rights laws. In 2003–04 the Chanda Smith Consent Decree was replaced with the Modified Consent Decree (MCD). This revised consent decree establishes over 15 outcomes that the District must meet by June 30, 2006, to be released from the court. The outcomes focus on assessment, graduation/completion rates, suspensions, placement, transition, disproportionality, complaint response time, service delivery, parent participation, translations, teacher quality, and behavioral interventions.

4. Program Description

- Installation, repair, and upgrades to fire alarm, fire-suppression, and other fire/life safety systems and equipment and other fire/life safety projects
- Americans with Disabilities Act (ADA) improvements to accommodate disabled students
- Asbestos hazard removal program
- Replace pipes and plumbing systems in schools to remove lead and improve water quality
- Install and upgrade air conditioning and ventilation filtration systems to improve air quality at schools
- Replace the District's aging police emergency radio system
- Installation of security alarms, security systems, security cameras, and other intrusion/security system projects
- Emergency-communications upgrades for classrooms to ensure immediate access to 911 system Networking, voice communications, and security-measure installations and upgrades at Skills Centers, Occupational Centers, Opportunity Schools, and Learning Centers

Lead and Asbestos and Other Code-Compliance

- Lead and asbestos abatement in classrooms, hallways, cafeterias, gymnasiums, auditoriums, libraries, offices, and other school buildings and grounds
- Repairs and improvements designed to achieve compliance with state and local building codes

Special Education Career Transition Centers

- Renovate existing facilities to provide Career Transition Centers for severely disabled students to teach them living and career skills

Library Upgrades

- Improvements and new equipment for libraries and media centers, including inventory control and security equipment

School Repair and Expansion

- Systematic program to prioritize District repair projects in an effort to achieve a satisfactory District-wide condition for facilities, using the "Facilities Condition Index," a nationally recognized metric to evaluate and quantify the facility repair requirements
- Provide missing and upgrade deficient school buildings (core facilities) such as restrooms, auditoriums, gymnasiums, libraries, playgrounds, multi-purpose rooms, administrative spaces, and parking, leveraging bond funds with State, non-profit, business, private, and industrial matching funds

4. Program Description

- Provide furnishing and equipment for new and existing facilities
- Re-New Our Schools – campus-wide renovations, upgrades and creation of smaller schools, including magnets, to create a portfolio of small learning environments
- Provide adequate specialized labs necessary to teach the courses students need to meet A-G requirements and gain eligibility for admission to UC/CSU colleges
- Reopening closed schools for use as school facilities
- Upgrades and repairs to plumbing, lighting, and electrical systems
- Upgrades and repairs to heating, ventilation, and air conditioning systems
- Interior repair, remodeling, painting, and renovations
- Paving, striping, and equipping athletic fields, playgrounds, play equipment, fencing, and other site-improvement projects
- Repair and replacement of building systems such as flooring, windows, and roofing
- Provide new and repair and replace existing playground equipment, including matting
- Classroom remodeling and other modernizations and renovations
- Exterior repair, painting, remodeling, and renovations
- Repair and replacement of lockers
- Structural and architectural modifications and renovations to convert large schools into small schools, magnets, and small learning communities

Computer and Communications

- Provide schools with modernized classrooms to leverage new instructional models and virtual learning communities
- Complete build-out of Local Area Networks in schools, install converged data communication network, and increase bandwidth to schools to provide access to high quality instructional content
- Build or acquire an energy-efficient data center for critical business, safety, and instructional systems and implement smart IT asset management infrastructure
- Installation of, and upgrades to, telecommunications and video-teleconferencing facilities and systems

4. Program Description

- Installation of, and upgrades to, public-address systems, emergency radio communications systems, and other communications facilities
- Hardware and software for information-technology applications

Sustainable Schools

- Improve energy efficiency, water efficiency, and renewable energy at schools, including installation of energy efficiency projects and renewable energy projects, such as solar and wind arrays, to contribute toward compliance with the California Global Warming Solutions Act of 2006
- Installation of low-flow restroom fixtures and smart irrigation controllers in schools and other water efficiency projects

Adult and Career Education

- Projects to ensure that schools have the facilities necessary to provide career training for students who will not be attending college

Early Childhood Education

- Projects to renovate, repair, and create early education centers in elementary schools to close the achievement gap for all children by providing additional seats for preschool children

School Buses

- Replace existing, aging diesel buses with modern vehicles meeting California's strict air-emissions standards and reducing operating costs

Food Service

- Replace existing equipment deemed beyond economical repair and upgrade outdated facilities, outdated plumbing, exhaust hoods and fire suppression systems to meet current fire, mechanical and health codes and resolve Department of Public Health violations.
- Upgrade secondary school cafeterias by modernizing serving lines, equipment configuration, serving, and seating areas
- Provide the ability to keep hot food hot and cold food cold at the point of service
- Increase through-put of students and correlating increase in seating requirements
- Replace aging beyond economic repair refrigeration systems with energy-efficient systems

4. Program Description

Temporary-classroom replacement and upgrade

- Replacement of temporary portable classrooms
- Structural upgrades of portable classrooms and other projects to replace or structurally upgrade projects where replacement is uneconomical, impractical, or infeasible
- Provision and relocation of portable classrooms

Not every project listed would be undertaken at every campus. Some projects were completed with funding from other sources due to urgency, and some campuses may not undergo any of the repairs, upgrades, or modernization projects listed here. Each category of project would be carried out at schools found to have the greatest need, as determined by the Board. ~~These projects will be allocated to one of the four FSD programs.~~

Since 1997, the District's capital improvement program has been comprised of multiple sub-programs organized by project type, funding source, urgency or other policy initiative or implementation strategy.— All of the programs are described in the District's FSD SEP.— Most recently, the FSD's largest programs have been organized into four categories:

- New School Construction Program
- Repair and Modernization Program
- Joint Use/Innovation Fund and Charter Facilities Program
- Capital Improvement Program

Moving forward, most capital projects will be included in the District's SUP.— This Program EIR will be applicable to all projects included in the SUP and also those already approved and included in the programs below.

4.4.1 New School Construction Program

4.4.1.1 BACKGROUND AND DESCRIPTION

The New School Construction Program was implemented in 2000 as a systematic approach to relieve overcrowding and address facilities needs through the construction of new classroom seats and the replacement or expansion of athletic and play space at school sites.³²

To provide new K–12 classrooms and open space, the District has used the following project strategies:

- Development on new land
- Construction on existing property

³² LAUSD Facilities Services Division, 2013, Strategic Execution Plan, Pages 6–7.

4. Program Description

- Placement of modular units or portable classrooms
- Reopening of closed schools
- Expansion of existing schools
- Redevelopment of existing schools

In addition to new K–12 school projects, the New School Construction Program also includes early education projects under the following programs:

- Early Childhood Education
- Full-Day Kindergarten Program
- Escutia Program

Early Childhood Education

Local bond measures included funding for early education center (EEC) projects to support Early Childhood Education program. EECs serve children that are two to five years of age. In order to maximize educational and community benefits, EEC projects have been planned and sited in conjunction with new elementary school projects, when feasible. Funds for this pre-kindergarten program were allocated to 31 expansion projects as well as 8 new facilities.

Full-Day Kindergarten Program

Beginning in 2004, the New School Construction Program began planning how to implement facilities for the Full-Day Kindergarten (FDK) Program at all LAUSD elementary schools within a four-year time frame. FDK program provided kindergarten space by:

- Utilizing existing space by reconfiguring available classrooms for kindergarten use.
- Placing portable classrooms and portable restroom buildings at existing campuses.
- Completing new K–12 construction projects with space included to enable FDK.
- Employing boundary changes and grade reconfigurations.

Escutia Program

The Escutia Program was established by the state in 1998 to assist school districts with site acquisition and facilities-related costs of kindergarten and grades 1 through 3, which are in the Class Size Reduction Program. LAUSD developed a facilities mitigation plan (FMP) that was approved by the State Board of Education and included such projects as: land acquisition to expand playgrounds, additions at existing school sites, and construction of new schools. The FMP—in conjunction with the implementation of class-size reductions—provided permanent solutions to overcrowding at designated schools and relieved playground encroachment.

4. Program Description

4.4.1.2 GOALS AND OBJECTIVES

The primary goal of the New School Construction Program is to provide LAUSD students with the opportunity to attend a school in their neighborhood that operates on a traditional two-semester calendar. The New School Construction Program has the following objectives:³³

- Provide a neighborhood school on a single-track, two-semester calendar to all students as soon as possible
- Eliminate involuntary busing of capped students as soon as possible
- Relieve classroom overcrowding by restoring pre-1991 classroom size norms as soon as possible
- Reduce reliance on portable classrooms as soon as possible
- Maximize the use of limited bond funds to provide the needed classroom facilities
- Expand and increase early childhood education capacity
- Develop new charter school facilities
- Create schools that are centers of community engagement both during and outside of normal operating hours
- Pursue partnerships with non-profits and community-based organizations for development of joint use projects
- Avoid the displacement of existing residences and businesses where feasible
- Maintain traditional classroom instruction hours for elementary, middle, and high school students of approximately 7 AM to 3 PM
- Maintain existing opportunities for after-school athletic and extracurricular activities
- Build and maintain schools that reflect the wise and efficient use of limited land and public resources.

The following additional, more specific, objectives were established as part of the SEP:³⁴

³³ LAUSD, Office of Environmental Health and Safety (OEHS). New School Construction Program, Final Program Environmental Impact Report. Board Certified June 8, 2004.

³⁴ LAUSD Facilities Services Division, 2013, Strategic Execution Plan, Page 6. [http://www.laschools.org/documents/download/about_fsd/sep/2012_consolidated_strategic_execution_plan/2013_Facilities_Services_Division_SEP_\(Final_6-21-13\).pdf?version_id=310146003](http://www.laschools.org/documents/download/about_fsd/sep/2012_consolidated_strategic_execution_plan/2013_Facilities_Services_Division_SEP_(Final_6-21-13).pdf?version_id=310146003).

4. Program Description

- Fulfill District obligations resulting from the Williams case settlement by eliminating the use of the Concept 6 calendar
- Eliminate involuntary busing and multi-track calendars
- Implement Full Day Kindergarten throughout the District
- Build new schools where the overcrowding need is greatest
- Integrate small schools or small learning communities into the development, design, and delivery of new secondary schools

4.4.1.3 ACHIEVEMENTS

With the exception of one project, all K–12 projects originally identified under the New School Construction Program have been completed.

Provision of New Student Seats. Under the New School Construction Program, as of January 2014, 130 new schools and 372 school expansions are currently providing more than 164,000 new student seats. The most recent schools opened were 18 new K–12 schools, 4 new K–12 expansion projects, and 1 new adult education center in 2011 and 2012. In addition, 1 new K–12 school and 2 new early education centers were opened in 2013.³⁵

Compliance with Williams Settlement. Because of the addition of new K–12 seats, along with changes in enrollment and adjustments to classroom loading standards, the operation of a Concept 6 (three-track, year-round) calendar was eliminated in July 2012 in compliance with the Williams settlement agreement.³⁶ Only three District schools remained operating on a four-track year-round (90/30) calendar in the 2012–13 school year. At the start of the 2013–2014 school year, all three of these schools came off multi-track calendars.

Reduction in Involuntary Busing. The New School Construction Program facilitated a 98 percent decrease in involuntary busing over 10 years; with only two schools requiring busing in the 2013–14 school year.

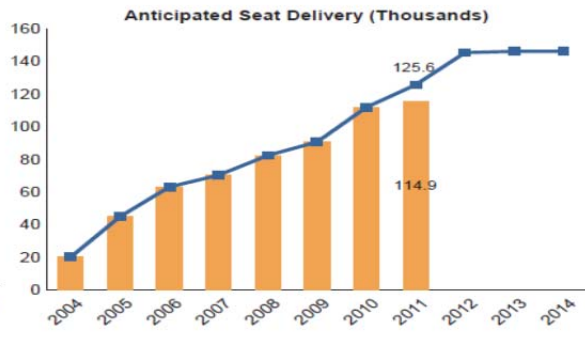
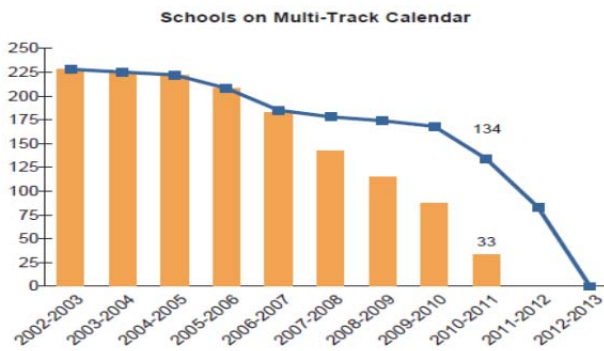
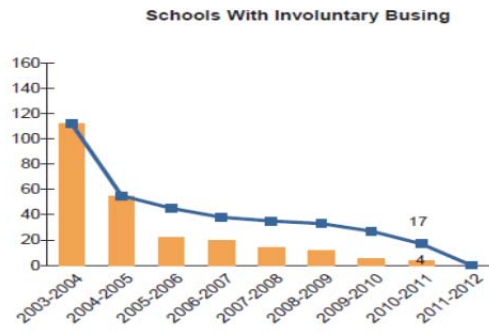
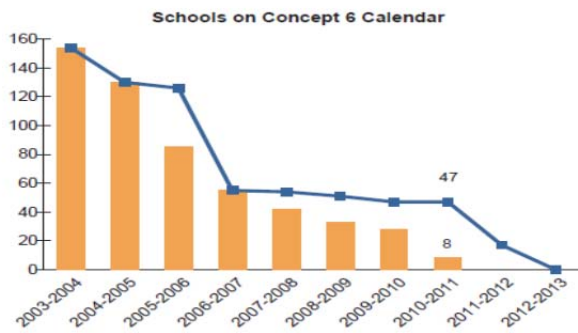
New School Construction Program status graph below shows that the use of Concept 6 and multi-track calendars and student busing have declined as the number of student seats has increased.³⁷

³⁵ LAUSD Facilities Services Division, 2013, Strategic Execution Plan, Cover Letter.

³⁶ The *Eliezer Williams, et al., vs. State of California, et al. (Williams)* case was a landmark Superior Court case to provide all students equal access to instructional materials, safe schools, and quality teachers. (<http://www.cde.ca.gov/eo/ce/wc/wmslawsuit.asp>).

³⁷ LAUSD Facilities Services Division. Monthly Program Status Report. June 2011. New Construction Program Status. Page 2 or 15. <http://laschools.org/fs-general/download/NC-monthly-report.pdf>.

4. Program Description



Early Childhood Education

As of January 2014, all 31 expansion projects were still under evaluation to determine priority. Three new EECs opened in the fall 2013, and the remaining five have not started.

Full Day Kindergarten Program

The FDK Program is complete except for DSA closeout and certification process for some schools. Additional projects, not part of original FDK implementation, have a few remaining schools with portables.

As of 2008, FDK implementation had been achieved at all 475 schools that have a kindergarten curriculum. This included 15 more schools than identified in the original plan. In addition, after the four-year FDK implementation timeframe, permanent classrooms were provided for other schools that had temporary classrooms. Because of increased enrollment projections, a few of the remaining schools that have portable classrooms (installed as a temporary solution for meeting District student density guidelines) do not have the space required to provide permanent classrooms. These schools are currently being evaluated to determine if the FDK portables can be removed, moved, or replaced.

Escutia Program

A total of 640 portable classrooms were removed under the Escutia Program. To satisfy state requirements, portable classrooms must be removed from classroom use by either physical removal from the site or by

4. Program Description

converting the portable classroom to a nonclassroom use, such as parent and family centers or administrative space. District-wide removal and/or conversion of portable classrooms, coordinated by the District's Relocatable Housing Unit and School Management Services, restored approximately 30 acres of outdoor play space. The restoration of this space has brought several campuses into compliance with CDE play area size standards.³⁸ All projects identified under the Escutia Program have been completed.

4.4.1.4 FUTURE PROJECTS

This program is effectively complete. As part of the SUP no new stand-alone schools would be constructed. Small expansions to existing schools may occur or small learning centers adjacent to existing schools may occur. The New School Construction Program will remain in place so future funding may be allocated when new schools are required.

4.4.2 Repair and Modernization Program

4.4.2.1 BACKGROUND AND DESCRIPTION

Established in 1997, the Repair and Modernization Program provides guidelines and funding for improvement to school buildings that are around 50 years old on average.

4.4.2.2 GOALS AND OBJECTIVES

The principal goal of the Repair and Modernization Program is to improve deteriorating, aging, and outdated conditions at existing schools.³⁹ Another goal is to minimize disruptions to educational programs and other activities in the operating school environment while completing repair and modernization projects needed to improve the educational environment.

4.4.2.3 ACHIEVEMENTS

Under the Repair and Modernization Program, the District has addressed an accumulated backlog of repairs and made major improvements in inadequate and aging facilities. The program has included projects such as:

- Electrical systems upgrades
- Damaged concrete repairs
- New lockers installation
- Restroom renovations to meet state and federal accessibility codes
- Roof replacements
- Code-compliant fire alarm installations
- Safety and technology upgrades

³⁸ CDE. California Department of Education, School Facilities Planning Division. Guide to School Site Analysis and Development. Section 2. School Site Requirements. Land for Outdoor Physical Education. <http://www.cde.ca.gov/ls/fa/sf/guideschoolsite.asp#Section2>.

³⁹ LAUSD Facilities Services Division, 2013, Strategic Execution Plan, Page 8.

4. Program Description

- Construction or modernization of athletic facilities
- Lighting upgrades in classrooms
- New exterior and interior paint
- Auditorium renovations
- Library and science lab renovations
- New food services additions and improvements

Though the majority of projects have been completed as part of the overall Repair and Modernization Program, projects were also included to address specific needs under the following managed programs:

- Adult and Career Education
- Air-Conditioning Programs
- Asbestos Abatement
- Board Member Priorities
- Career Academies Programs, including Career Technical Education and Qualified Zone Academy Bond (QZAB) Core Facilities Programs, including food services, grandstands, libraries, and sanitary buildings
- Early Childhood Education
- ~~Educational Service Center~~ Local District Alterations and Improvements
- Fire Alarms
- Joint Use Development
- Major Repairs
- Modified Consent Decree, including the Rapid Access Program
- Portable Programs, including the Relocatable Housing Unit and Portables Removal Program
- Science Lab & Library Renovation Programs, including Science Labs 2012, Proficiency Plus For All, and Wonder of Reading
- Seismic Programs including: Life Safety & Seismic, Seismically Repair and Upgrade Portables, and Federal Emergency Management Agency (FEMA)
- Small Learning Communities

4. Program Description

■ Other Initiatives and Legacy Programs

In order to coordinate and plan for the diverse range of managed programs, the Repair and Modernization Program staff has conducted significant outreach with community stakeholders, school and local administrators, and the Board of Education.

Construction has been completed on more than 23,000 repair and modernization projects.

4.4.2.4 FUTURE PROJECTS

This is an ongoing program with projects being completed and added over time. In the next year, the District anticipates the completion of more than 300 projects at existing campuses as part of the Repair and Modernization Program.

4.4.3 Joint Use/Innovation Fund and Charter Facilities Program

4.4.3.1 JOINT USE/INNOVATION FUND

Background and Description

LAUSD Planning and Development Branch manage the Joint Use/Innovation Fund Program. This program develops partnerships and projects for both new and existing schools. Bond funds allow joint planning with community partners to construct projects such as health care (mobile healthcare initiative and school-based clinics), fields and open space, aquatics programs, and youth centers.

This program provides new facilities through the acquisition, purchase, lease, construction, reconstruction, furnishing, and equipping of joint use facilities separate from and in conjunction with other construction and repair projects. These projects enable the District to take advantage of opportunities to partner with other public and private entities for the joint and community use of facilities, including, potentially, the expansion of early childhood development, the creation or expansion of satellite academies on nondistrict campuses, the shared use of open space associated with school recreational facilities, expansion of joint school and community recreational facilities, the creation and expansion of adult education facilities in partnership with private and public entities, and the creation and expansion of opportunities to share the use of facilities like parks and libraries.⁴⁰

Goals and Objectives

The foremost goal of the Joint Use/Innovation Fund Program is to promote joint planning with local communities, nonprofit organizations, community-based groups, and public agencies to enhance school facilities and maximize community use.⁴¹

⁴⁰ Measure Q text. <http://www.laschools.org/bond/meeting-archives/download/measures/MeasureQ.pdf>.

⁴¹ LAUSD Facilities Services Division, 2013, Strategic Execution Plan, Page 9.

4. Program Description

Achievements

The Joint Use/Innovation Fund program has leveraged partnerships to provide students, teachers, and the community with needed resources such as:

- Improved recreational facilities, athletic fields, gymnasiums, aquatic facilities, and “green” campuses by partnering with organizations that provide capital, in-kind materials, and needed programming to school sites.
- Expanded classrooms and other facilities to provide space for youth development centers and supplementary enrichment programs.
- Enhanced school facilities for multiple uses to encourage civic and community engagement.
- Developed school-based clinics and capital infrastructure to allow for health care providers to collocate on school campuses to serve students, families, and the community.

As of 2013, a total of 17 joint use projects have been completed under the New School Construction Program and Capital Improvement Program as well as 52 joint use projects completed under the Repair and Modernization Program include Joint Use/Innovation Funds. Partners have worked with LAUSD to develop facilities and leverage resources to provide viable and sustainable contributions that benefit students and the community. In addition to capital contributions, partners have made program contributions that typically include direct student program facilitation, auxiliary instructional or recreational programming, staff/supervision services, maintenance and operations, utilities, and liability coverage. There are currently more than 60 partners collaborating with the District as part of the Joint Use/Innovation Fund Program.

Future Projects

~~This is an ongoing program with projects being completed and added over time.~~

4.4.3.2 CHARTER FACILITIES PROGRAM

Background and Description

A charter school is a public school, and it may provide instruction in any of grades K–12. A charter school is usually created or organized by a group of teachers, parents, and community leaders or a community-based organization. Charter schools can be created through conversion of an existing LAUSD school or construction of a new charter school. Charter schools can be fully independent or affiliated with LAUSD. Specific goals and operating procedures for the charter school are detailed in an agreement (or “charter”) between the LAUSD Board of Education and charter organizers. A charter is granted by the Board and approved by the state for a five-year period.⁴²

⁴² LAUSD Charter Schools. Charter School Facts. <http://www.lausd.k12.ca.us/lausd/offices/charter/facts.htm>.

4. Program Description

A charter school is generally exempt from most laws governing school districts, except where specifically noted in the law. California public charter schools are required to participate in the statewide assessment test, called the STAR program (Standardized Testing and Reporting). The law also requires that a public charter school be nonsectarian in its programs, admission policies, employment practices, and all other operations and prohibits the conversion of a private school to a charter school. Public charter schools may not charge tuition and may not discriminate against any pupil on the basis of ethnicity, national origin, gender, or disability.⁴³

The Charter Facilities Program provides new student seats through the acquisition, purchase, lease, construction, reconstruction, repair, rehabilitation, furnishing, and equipping of facilities for use as charter schools. It also furnishes and equips charter-operated facilities.⁴⁴

Since June 2008, when the Charter Bond Fund was transferred to the LAUSD Planning and Development Branch, emphasis has been on creating partnerships to pursue charter developments that address State Proposition 39.⁴⁵ The Charter Facilities Program was developed as a way to partner with charter schools for the expansion of charter school facilities.⁴⁶ Currently there are 51 charter schools under the jurisdiction of the LAUSD, serving approximately 33,000 students in kindergarten through 12th grade.⁴⁷

Goals and Objectives

The goals of the Charter Facilities Program is to provide new student seats, to relieve overcrowding at District campuses, and to help meet the District's obligations under Prop 39 to offer underutilized space on District campuses to charter schools. To facilitate these goals, the Charter Facilities Program includes the following program initiatives:

- Furniture and Equipment Projects
- Proposition 39 Co-locations Solutions
- Augmentation Grants/Long-Term Charter Facilities

Achievements

Local charter bond funds are used to meet each of the three initiatives. Furniture and Equipment Projects have provided charter operators with furniture, equipment, and portable buildings. Proposition 39 co-locations have provided necessary facility modifications to better accommodate charter schools. Augmentation Grants/Long-Term Charter Facilities Solutions provided local bond funds, District-owned land for development, or both to leverage with state grants and/or third-party funding sources. These projects have been developed in response to significant increases in the annual demand for facilities under

⁴³ CDE. Charter School General Information. <http://www.cde.ca.gov/sp/cs/re/csabout.asp>.

⁴⁴ Measure Q text. <http://www.laschools.org/bond/meeting-archives/download/measures/MeasureQ.pdf>.

⁴⁵ Proposition 39, introduced in the November 2000 ballot, amended California *Education Code (EC)* Section 47614, with the intent that public school facilities should be shared fairly among all public school pupils, including those in charter schools. <http://www.cde.ca.gov/sp/cs/as/proposition39.asp>.

⁴⁶ LAUSD Facilities Services Division, 2013, Strategic Execution Plan, Page 9.

⁴⁷ LAUSD Charter Schools. Charter School Facts. <http://www.lausd.k12.ca.us/lausd/offices/charter/facts.htm>.

4. Program Description

Proposition 39 and opportunities for long-term developments that benefit LAUSD and charter schools. Actions taken by the Board of Education in 2011 allocated \$32.5 million to provide permanent facilities for charter schools, either through the reconfiguration of existing space or the construction of new buildings.

Future Projects

This is an ongoing program with projects being completed and added over time. Projects include reconfiguration of existing space and construction of new buildings, along with provision of furniture and equipment.

4.4.4 Capital Improvement Program

4.4.4.1 BACKGROUND AND DESCRIPTION

On April 13, 2010, the Board approved the establishment of the Capital Improvement Program.⁴⁸ This approval allocated local bond funds to the Capital Improvement Program that were previously held in the New School Construction Program reserve, as well as project savings from a favorable bidding environment. In addition, the Board action approved a list of priority projects to be undertaken and allocated funds to assess and plan for the capital needs of District schools that may not have been addressed by previous projects.

Similar to the way the New School Construction Program and the Repair and Modernization Program have evolved over the years in response to various factors, the Capital Improvement Program has also changed. These changes address emerging and changing priorities, the availability of funds, and the subsequent ability to define new projects.

The Capital Improvement Program includes projects carried out under several other programs:

- New School Construction Program
 - Includes new school and redevelopment projects
 - While these new school and redevelopment projects are not required to meet the goal of providing neighborhood schools that operate on a traditional two-semester calendar District-wide, they will further relieve overcrowding, reduce reliance on portable classrooms, and significantly improve school facilities through the redevelopment of existing campuses.
- Repair and Modernization
 - Includes targeted campus improvements, core facility renovations, and shade shelter projects at selected campuses.
- Photovoltaic Installations
 - Projects for the installation of solar panels on rooftops and parking lot shade structures at sites throughout the District.

⁴⁸ LAUSD Facilities Services Division, 2013, Strategic Execution Plan, Pages 10–11.

4. Program Description

- In total, the installations are anticipated to generate approximately 20.9 megawatts of solar energy and thereby reduce utilities costs over a 20-year period.
- The program is funded through local bond funds and Los Angeles Department of Water and Power (LADWP) settlement funds and incentive funds.
- Sustainability
 - Includes projects to replace or retrofit lighting at various schools throughout the District as well as replace inefficient electrical transformers at selected high school campuses.
 - The sustainability program includes energy conservation projects that will reduce the District's utility bill.
- Facelift Program
 - Includes projects developed to immediately improve the visual conditions of District-owned school sites, starting with secondary schools and continuing with high need elementary schools.
 - This program has been allocated local bond funds and is augmented by General Fund dollars earmarked for Maintenance and Operations where projects include noncapital maintenance scope.
- Parent and Family Center Improvements
 - Includes projects that will provide schools with new or enhanced parent and family center facilities that will serve as a welcoming environment and reflect the central role of parents and families in education.
 - Local bond funds were allocated for the development of parent and family center upgrade and improvement projects throughout the District in June 2011. Since then, 44 individual projects have been approved by the Board.
 - Additional projects will be developed and prioritized through a collaborative effort led by the Parent Community Services Branch and FSD with support from school site personnel, parents, Instructional Superintendent offices, and Board Member offices. Project definitions are then brought to the Bond Oversight Committee (BOC) for review and the Board of Education for approval.

4.4.4.2 ACHIEVEMENTS

Since its inception, several actions taken by the Board of Education have affected the Capital Improvement Program, including the allocation of funds for:

- Additional priority projects designated as Capital Improvement Program scope, including projects for Photovoltaic Installations, Sustainability, Facelift Program, and Parent and Family Center Improvements.
- Projects/programs that were previously approved by the Board, for which funds had since been removed, and other unfunded District priorities included in the Capital Improvement Program exhibit.

4. Program Description

- A program for the removal and replacement of fold-up tables/benches at 115 schools that are deteriorated, damaged, or identified as posing a potential safety hazard; local bond funds allocated.
- A program with local bond funds allocated for the identification and replacement of inefficient lighting fixtures at existing school sites that will improve energy conservation and enable LAUSD to reduce General Fund electricity costs. The District is working with the Los Angeles Department of Water & Power (LADWP) on this program via a Memorandum of Understanding.

The Capital Improvement Program has resulted in the completion of two new K–12 schools and one new adult education center as well as more than 200 repair and modernization projects, photovoltaic installations, sustainability projects, and campus “facelifts.”

4.4.4.3 FUTURE PROJECTS

This is an ongoing program with individual projects being completed and added over time. Currently two new K–12 schools, two K–12 redevelopment projects, and 200+ other repair and modernization projects at existing facilities are in process.⁴⁹

4.5 TYPICAL SUP PROJECT CATEGORIES

~~While LAUSD has identified some site-specific projects (as listed in Measure Q), this 2008 list is now outdated because some projects have already been completed with funding from other sources due to urgency, and other projects have been added. Because of the extensive number of individual projects, For the purpose of initial environmental project review, this Program EIR groups potential projects they have been grouped into four project type categories.— These categories are based on the project scope, amount and type of construction and on location of the project. The environmental analysis for each issue area in this document is based-organized following on the following these typical SUP project categories; and not the four FSD programs which have overlapping and duplicate types of projects but different funding sources.~~

- Type 1. New Construction on New Property (adjacent to existing campus)
- Type 2. New Construction on Existing Campus
- Type 3. Modernization, Repair, Replacement, Upgrade, Remodel, and Renovation
- Type 4. Operational and Other Campus Changes

The type of projects that are anticipated to be undertaken as part of the SUP project categories is listed below.

⁴⁹ LAUSD Facilities Services Division, 2013, Strategic Execution Plan, Cover Letter.

4. Program Description

4.5.1 Type 1. New Construction on New Property

- Property acquisition adjacent to existing campus for campus expansion. These projects may include, but are not limited to, new building construction for classrooms, library/media center, performing arts, gymnasium, administration offices and other construction, such as a stadium, athletic fields, restrooms, drop-off zones, parking and driveways.

4.5.2 Type 2. New Construction on Existing Campus

- New classroom building; net increase in student capacity greater than 25 percent or 10 classrooms, whichever is greater.
- New classroom building; net increase in student capacity less than 25 percent or 10 classrooms, whichever is greater.
- New building including, but not limited to, library/media center, performing arts, auditorium, gymnasium, and other construction such as athletic venue lights (for field or outdoor pool), stadiums, outdoor pools, athletic fields.
- Demolition and new building construction on existing campus (replace school building on same location).
- Installation of temporary structures
- Construction of new health clinic, parent and family center, other community uses, including joint use on existing campus
- Construction of restrooms, drop-off zones, new parking lots, new driveways.

4.5.3 Type 3. Modernization, Repair, Replacement, Upgrade, Remodel, Renovation, and Installation

- Installation of modular units, portable classrooms, or bungalows; net increase in student capacity is greater than 25 percent or 10 classrooms, whichever is greater.
- Installation of modular units, portable classrooms, or bungalows; net increase in student capacity less than 25 percent or 10 classrooms, whichever is greater. (considered a minor addition because it qualifies for a CEQA Exemption)
- Improvements to existing health clinic, parent and family center, or other community uses on existing campus.
- Demolition and removal of permanent buildings or structures.

4. Program Description

- Installation at existing schools such as play equipment, fencing, ADA compliance.
- Outdoor repair, modernization, replacement or upgrade of athletic fields (natural grass to synthetic turf), play equipment, fencing, parking, replace shade shelter, asphalt/concrete paths, driveways, ADA compliance, seismic retrofits.
- Sustainability energy conservation installations such as new photovoltaic panels on rooftops and parking lot shade structures or wind arrays.
- Repair and replacement of building systems such as flooring, windows, and roofing.
- New or replacement of furniture or other interior equipment.
- Replace existing diesel buses with higher efficiency buses.
- Sustainability energy conservation changes such as replacement, upgrade, or retrofit of inefficient lighting, electrical transformers, building insulation, ~~installation and installation~~ of irrigation smart controllers.
- Structural upgrades of modular units or portable classrooms, relocation of portables on campus.
- Exterior cosmetic improvements such as Facelift Program, painting, site cleanup.
- Interior remodeling and renovations, painting, installation, repair, and upgrades to fire/life-safety/security/emergency systems, ADA, plumbing, lighting, electrical, HVAC, computer systems, low-flow restroom fixtures, food service equipment.
- Replacement of lead water pipes.
- Abatement of lead-based paint and asbestos in buildings.

4.5.4 Type 4. Operational and Other Campus Changes

- Removal of modular units, portable classrooms, bungalows, or other temporary structures at existing school facilities.
- Change in student capacity (student classroom loading).
- Change in grade structure (e.g., change grades from 4–6 to 7–8 or other).
- Change in use or occupancy of existing facilities (charter school, co-locations, joint use).
- Co-location or land lease agreements for charter school facilities.

4. Program Description

- Closure of existing school or transfer of students to another school.
- Reopening closed schools.
- Lease or use of non-District property for student classroom purposes.

Project Prioritization Methodology

LAUSD's approach will start with the school sites that have the most critical physical conditions and improve them so they are safe, healthy, and functional places to learn. This is an important step towards providing equity between newer schools and legacy schools so that every student has an equal opportunity for success.

Master Planning activities and facility site assessments have been conducted for District schools over the last several years. These activities have resulted in the identification of capital needs at every District school campus. One tool developed by the District for reporting on the conditions of each school is the Facilities Condition Index (FCI). This provides a scale for assessing individual campus needs as well as presenting needs relative to other campus site and school building deficiencies.

Projects Prioritized Based on Physical Characteristics

School sites that will receive a major renovation, modernization, and/or reconfiguration project will be identified based on the following characteristics, with the health and safety of our school facilities being the top priority:

- Critical facilities conditions as defined by the Facilities Condition Index
- Buildings identified for seismic evaluation
- High proportion of classrooms in portable buildings
- Inadequately sized core facilities such as food services, play space, multi-purpose rooms, auditoriums and libraries
- Lack of secured physical entryways
- Site density

Framework for Individual Projects

Individual renovation, modernization and/or reconfiguration projects would be defined based on the following framework:

- Projects that address the most critical physical conditions to ensure a safe learning environment
 - Buildings identified for seismic evaluation

4. Program Description

- Buildings and building systems and components that have been identified as being in critical condition by the Facilities Condition Assessment
- Projects that improve the functional adequacy of buildings in a critical physical condition
- Projects should also consider any projected changes in demographics for a school's resident students

More than 200 projects are already in development to address critical repairs throughout the District. There is also funding targeted for charter school facilities, special education facilities, school food services facilities, early education facilities, adult education facilities, afterschool/partnership facilities, school buses, Inspector General oversight, technology upgrades and for other priority projects.⁵⁰

- District's Board of Education will adopt a prioritization methodology for site-specific projects proposed under the SUP. This Program EIR would be applicable to all capital project activities currently in planning or design, and all future projects developed and added to the District's Strategic Execution Plan (SEP).

4.6 LAUSD STANDARD CONDITIONS

The following LAUSD Standard Conditions are compiled from existing LAUSD standards, guidelines, specifications, practices, policies, school design guides, 2004 Program EIR mitigation measures, and other documents standard conditions, guidelines, specifications, practices, policies, and project design features. These standard conditions (LAUSD Standards) would will be incorporated into projects implemented under the SUP, as appropriate. All sources referenced in this EIR are available to the public at Los Angeles Unified School District, 333 South Beaudry Avenue, 28th Floor, Los Angeles, California 90017. Contact: Gwenn Godek, CEQA Manager at (213) 241-6253.

⁵⁰ "Prioritization Methodology for Identifying and Defining Major Renovation, Modernization, and/or Reconfiguration Projects"
Memorandum from Superintendent Ramon C. Cortines to Members, Board of Education, November 3, 2014.

4. Program Description

Table 4-1 LAUSD Standard Conditions of Approval Standards

PDF Reference #	Topic	Trigger for Compliance	Implementation Phase	Standard Conditions of Approval Standard Conditions	Original Location of original text; some updates have been made Source
AESTHETICS					
Standard Conditions					
<u>SC-AE-001</u> Compliance	Degradation of neighborhood character	When a project will have aesthetic impacts from Demolition of historic building or construction of a new building	During project design	School Design Guide. This document outlines measures for re-use rather than destruction of historical resources. Requires the consideration of architectural appearance/consistency and other aesthetic factors during the preliminary design review for a proposed school upgrade project. <u>Architectural quality must consider compatibility with the surrounding community.</u>	School Design Guide. Los Angeles Unified School District. January 2014.
<u>SC-AE-002</u> Compliance	Degradation of neighborhood character	When a project may increase graffiti and accumulation of rubbish and debris along the walls adjacent to public rights-of-way-	During project operation	School Design Guide. This document outlines measures to reduce aesthetic impacts around schools, such as shrubs and ground treatments that deter taggers, vandal-resistant and graffiti-resistant materials, painting, etc.	School Design Guide. Los Angeles Unified School District. January 2014.
<u>AE-00</u> Compliance	Light spillage and glare	When a project will generate new light sources.	During and after installation of lights	School Design Guide. This document outlines requirements for lighting and measures to minimize glare for pedestrians, drivers and sports teams, and to avoid light spilling onto adjacent properties.	School Design Guide. Los Angeles Unified School District. January 2014.
<u>SC-AE-3</u>	<u>Degradation of neighborhood character and viewshed obstruction</u>	<u>Increase density, height, bulk, or decrease setback compared to the surrounding neighborhood; increase opportunities for graffiti</u>	<u>During project design</u>	<u>LAUSD shall assess a proposed project's consistency with the general character of the surrounding neighborhood, including any proposed changes to the density, height, bulk, and setback of new building (including stadium), addition, or renovation. Where feasible, LAUSD shall make appropriate design changes to reduce or eliminate viewshed obstruction and degradation of neighborhood character. Such design changes could include, but are not limited to, changes to campus layout, height of buildings, landscaping, and/or the architectural style of buildings.</u>	<u>2004 New Construction Program EIR Mitigation Measure AE-1.1, adopted by the Board of Education on June 2004.</u>
<u>SC-AE-040</u> Compliance	Outdoor signs with electronic message display	When a project will install or change a new school marquee	Prior to final design and prior to and during installation	Marquee Signs Bulletin BUL-5004.1. This policy provides guidance for the procurement and installation of marquee signs (outdoor sign with electronic message display) on District campuses. The policy includes requirements for the design, approval, placement, operation, and maintenance of electronic school marquees erected and operated at a LAUSD schools. The policy also includes measures to mitigate light and glare, such as the use of "luminaries" in connection with school construction.	School marquees (outdoor sign with electronic message display). BUL-5004.1 adopted May 25, 2010.
<u>SC-AE-005</u> Compliance	Shadows	When a project will include Construction	Prior to project approval	OEHS CEQA Specification Manual, Appendix F, Protocol for Shadow Analysis in CEQA Documents for Proposed School Sites.	LAUSD OEHS CEQA Specification Manual, Appendix F, Protocol For

4. Program Description

Table 4-1 LAUSD Standard Conditions of Approval Standards

PDF Reference #	Topic	Trigger for Compliance	Implementation Phase	Standard Conditions of Approval Standard Conditions	Original Location of original text; some updates have been made Source
		of buildings or structures taller than surrounding neighborhood		This document outlines the methodology and impact thresholds for shadow analysis.	Shadow Analysis In CEQA Documents For Proposed School Sites. December 2005, Revised June 2007.
Project Design Features					
SC-AE-6	Light and glare	Generate additional light and/or glare	During and after installation of lights	<u>School Design Guide.</u> This document outlines requirements for lighting and measures to minimize glare for pedestrians, drivers and sports teams, and to avoid light spilling onto adjacent properties.	School Design Guide. Los Angeles Unified School District. January 2014.
SC-AE-74	Light spillage and glare	Generate additional light and/or glare When a project will generate new light sources	Prior to building occupation, first stadium event, or first use of lights.	LAUSD shall reduce the lighting intensity from the new sources on adjacent residences to no more than two foot-candles, measured at the residential property line. LAUSD shall utilize hoods, filtering louvers, glare shields, and/or landscaping as necessary to achieve the standard. The lamp enclosures and poles shall also be painted to reduce reflection. Following installation of lights the lighting contractor shall review and adjust lights to ensure the standard is met.	2004 New Construction Program EIR Mitigation Measures AE-1.2 , adopted by the Board of Education on June 2004. AE-1.2
SC-AE-8	Light and glare	Generate additional light and/or glare	Prior to building occupation, first stadium event, or first use of lights.	<u>Design site lighting and select lighting styles and technologies to have minimal impact off-site and minimal contribution to sky glow. Minimize outdoor lighting of architectural and landscape features and design interior lighting to minimize trespass outside from the interior.</u> <u>International Dark-Sky Association (IDA) and the Illuminating Engineering Society (IES) Model Lighting Ordinance (MLO) shall be used as a guide for environmentally responsible outdoor lighting. The MLO outdoor lighting has outdoor lighting standards that reduce glare, light trespass, and skyglow. The Joint IDA-IESNA Model Outdoor Lighting Ordinance (MLO) uses lighting zones (LZ0-4) which allow the District to vary the stringency of lighting restrictions according to the sensitivity of the area as well as consideration for the community. The MLO also incorporates the Backlight-Uplight-Glare (BUG) rating system for luminaires, which provides more effective control of unwanted light. IDA-IESNA Model establishes standards to:</u> <ul style="list-style-type: none"> • Limit the amount of light that can be used • Minimize glare by controlling the amount of light that tends to create glare • Minimize sky glow by controlling the amount of uplight • Minimize the amount of off-site impacts or light trespass 	NEW Based on The Collaborative for High Performance Schools. <u>High Performance Schools Best Practices Manual, Volume III-- Criteria.</u> Version 1.0, November 1, 2001. Adopted by the Board of Education on October 28, 2003. Updated 2009 CHPS Scorecard with 2011 Amendments. <u>SS5.1: Light Pollution Reduction.</u> Includes additional language from International Dark-Sky Association (IDA).
AE-2	Viewshed obstruction and degradation of neighborhood	When a project may have a significant adverse aesthetic impact from a school building or site design	During project design	LAUSD shall consider whether or not a proposed project is consistent with the general character of the surrounding neighborhood, including any proposed changes to the density, height, bulk, and setback of new or updated building. Where feasible, LAUSD shall make appropriate design changes to reduce or eliminate viewshed obstruction and degradation of neighborhood character. Such design changes could include, but	2004 New Construction Program EIR Mitigation Measures, adopted by the Board of Education on June 2004. AE-1.1

4. Program Description

Table 4-1 LAUSD Standard Conditions of Approval Standards

PDF Reference #	Topic	Trigger for Compliance	Implementation Phase	Standard Conditions of Approval Standard Conditions	Original Location of original text; some updates have been made Source
	character			are not limited to, changes to campus layout, height of buildings, landscaping, and/or the architectural style of buildings.	
AE-3	Light and glare	When a project will generate new light sources	Prior to building occupation, first stadium event, or first use of lights.	<p>Design site lighting and select lighting styles and technologies to have minimal impact off-site and minimal contribution to sky glow. Minimize outdoor lighting of architectural and landscape features and design interior lighting to minimize trespass outside from the interior.</p> <p>International Dark Sky Association (IDA) and the Illuminating Engineering Society (IES) Model Lighting Ordinance (MLO) shall be used as a guide for environmentally responsible outdoor lighting. The MLO outdoor lighting has outdoor lighting standards that reduce glare, light trespass, and sky glow. The Joint IDA-IESNA Model Outdoor Lighting Ordinance (MLO) uses lighting zones (LZO 4) which allow the District to vary the stringency of lighting restrictions according to the sensitivity of the area as well as consideration for the community. The MLO also incorporates the Backlight Uplight Glare (BUG) rating system for luminaires, which provides more effective control of unwanted light. IDA-IESNA Model establishes standards to:</p> <ul style="list-style-type: none"> Limit the amount of light that can be used Minimize glare by controlling the amount of light that tends to create glare Minimize sky glow by controlling the amount of uplight Minimize the amount of off-site impacts or light trespass 	<p>NEW. Based on The Collaborative for High Performance Schools. High Performance Schools Best Practices Manual, Volume III – Criteria. Version 1.0, November 1, 2001. Adopted by the Board of Education on October 28, 2003. Updated 2009 CHPS Scorecard with 2011 Amendments. SS5.1: Light Pollution Reduction. Includes additional language from IDA.</p>
AIR QUALITY					
Standard Conditions					
SC-AQ-00 1 Compliance	Air Toxics Health Risk	Place new classrooms or outdoor play areas. If project includes new occupied spaces - Within ¼-mile of mobile and stationary emission sources - Within 500 feet of a major transportation corridor (freeway, major rail line) - Within 500 feet of a major stationary source of emissions - On the LAUSD	Prior to project approval	<p>OEHS CEQA Specification Manual, Appendix J, Air Toxics Health Risk Assessment (HRA).</p> <p>This document includes guidance on HRA protocols for permitted, nonpermitted, 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.</p>	LAUSD OEHS CEQA Specification Manual, Appendix J, Air Toxics Health Risk Assessment (HRA). December 2005, Revised June 2007.

4. Program Description

Table 4-1 LAUSD Standard Conditions of Approval Standards

PDF Reference #	Topic	Trigger for Compliance	Implementation Phase	Standard Conditions of Approval Standard Conditions	Original Location of original text; some updates have been made Source
		<p><u>priority list of schools most at risk from air pollution</u></p> <p><u>-Near a high-risk facility previously identified by the OEHS.</u></p>			
Project Design Features					
<u>SC-AQ-12</u>	Construction Emissions	If project requires the use of large construction equipment	During project construction	LAUSD's construction contractor shall ensure that construction equipment is properly tuned and maintained in accordance with manufacturer's specifications, <u>to ensure excessive emissions are not generated by unmaintained equipment.</u>	LAUSD Best Management Practices, adopted by the Board of Education on June 2004 as part of the 2004 program <u>EIR</u> <u>Program EIR.</u>
<u>SC-AQ-23</u>	Construction Emissions	Requires all project requires a removal action for soil contamination	During project construction	<p>LAUSD's LAUSD or its construction contractor shall:</p> <ul style="list-style-type: none"> • Maintain slow speeds with all vehicles. • Load impacted soil directly into transportation trucks to minimize soil handling. • Water/mist soil as it is being excavated and loaded onto the transportation trucks. • Water/mist and/or apply surfactants to soil placed in transportation trucks prior to exiting the site. • During dumping, minimize soil drop height into transportation trucks or stockpiles <u>during dumping.</u> • During transport, cover or enclose trucks transporting soils, increase freeboard requirements, and repair trucks exhibiting spillage due to leaks. • Cover the bottom of the excavated area with polyethylene sheeting when work is not being performed. • Place stockpiled soil on polyethylene sheeting and cover with similar material. • Place stockpiled soil in areas shielded from prevailing winds. 	LAUSD Best Management Practices, adopted by the Board of Education on June 2004 as part of the 2004 program <u>EIR</u> <u>Program EIR.</u>
<u>SC-AQ-34</u>	Construction Emissions	<u>Exterior construction and the use of large, heavy or noisy construction equipment</u> When site-specific review of a school construction project identifies potentially significant adverse regional and	During project construction	<p><u>LAUSD shall prepare an air quality assessment.</u></p> <p><u>If site-specific review of a school construction project identifies potentially significant adverse regional and localized construction air quality impacts, then LAUSD shall implement all feasible mitigation-measures to reduce air pollutant emissions below the South Coast Air Quality Management District's (SCAQMD) regional and localized significance thresholds.</u></p> <p>LAUSD shall mandate in the that construction bid contracts for each project that identifies include potentially significant regional construction air quality</p>	2004 New Construction Program EIR Mitigation Measures <u>AQ-2.1</u> , adopted by the Board of Education on June 2004- <u>AQ-2.1.</u>

4. Program Description

Table 4-1 LAUSD Standard Conditions of Approval Standards

PDF Reference #	Topic	Trigger for Compliance	Implementation Phase	Standard Conditions of Approval Standard Conditions	Original Location of original text; some updates have been made Source
		localized construction air quality impacts.		<p>impacts, that the construction contractor implement the mitigation measures identified in the air quality assessment analysis for the project. Measures shall reduce construction emissions during high-emission construction phases from vehicles and other fuel driven construction engines, activities that generate fugitive dust, and surface coating operations. Specific <u>mitigation air emission reduction</u> measures include, but are not limited to, the following:</p> <p><u>Exhaust Emissions</u></p> <ul style="list-style-type: none"> • Schedule construction activities that affect traffic flow to off-peak hours (e.g. between 10:00 AM and 3:00 PM). • Consolidate truck deliveries and/or limit the number of haul trips per day. • Route construction trucks off congested streets. • Employ high pressure fuel injection systems or engine timing retardation. • Utilize ultra-low sulfur diesel fuel, containing 15 ppm sulfur or less (ULSD) in all diesel construction equipment. • Use construction equipment rated by the United States Environmental Protection Agency as having Tier 3 (model year 2006 or newer) or Tier 4 (model year 2008 or newer) emission limits for engines between 50 and 750 horsepower. • Restrict non-essential diesel engine idle time, to not more than five consecutive minutes. • Utilize electrical power rather than internal combustion engine power generators as soon as feasible during construction. • Utilize electric or alternatively fueled equipment, if feasible. • Utilize construction equipment with the minimum practical engine size. • Utilize low-emission on-road construction fleet vehicles. • Ensure construction equipment is properly serviced and maintained to the manufacturer's standards. <p><u>Fugitive Dust</u></p> <ul style="list-style-type: none"> • Apply non-toxic soil stabilizers according to manufacturers' specification to all inactive construction areas (previously graded areas inactive for ten days 	

4. Program Description

Table 4-1 LAUSD Standard Conditions of Approval Standards

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

4. Program Description

Table 4-1 LAUSD Standard Conditions of Approval Standards

PDF Reference #	Topic	Trigger for Compliance	Implementation Phase	Standard Conditions of Approval Standard Conditions	Original Location of original text; some updates have been made Source
				<ul style="list-style-type: none"> Utilize ultra-low VOC or zero-VOC surface coatings. Phase construction activities to minimize maximum daily emissions. Configure construction parking to minimize traffic interference. Provide temporary traffic control during construction activities to improve traffic flow (e.g., flag person). Develop a trip reduction plan for construction employees. Implement a shuttle service to and from retail services and food establishments during lunch hours. Increase distance between emission sources to reduce near-field emission impacts. Require construction contractors to document compliance with the identified mitigation measures. 	
AQ-4	Air toxics health risk project siting criteria	If project includes new occupied spaces within ¼-mile of emission sources	Prior to final site selection	<p>LAUSD shall prepare an HRA if new classrooms are:</p> <ul style="list-style-type: none"> Within 500 feet of a major transportation corridor (freeway, major rail line) such that health risks to students would be created or exacerbated. Within 500 feet of a major stationary source of emissions such that health risks to students would be created or exacerbated. On the priority list of schools most at risk from air pollution. Near a high risk facility previously identified by the Office of Environmental Health Safety (OEHS) such that health risks to students would be created or exacerbated. 	Based on LAUSD Board of Education Resolution Item 27 adopted January 22, 2008. This screening criterion is part of the Preliminary Environmental Screening of Proposed Project at Existing School Site checklist.
AQ-5	Air toxics health risk	When a health risk assessment identifies risks that exceed the standards	Prior to project construction	LAUSD shall design each new heating, ventilation, and air conditioning (HVAC) system to mitigate impacts from air emissions to a level below the following thresholds: 1) maximum individual cancer risk (MICR) of 1 in 100,000; or 2) chronic hazard index of 1; or 3) acute hazard index of 1; or 4) 1 hour CO standard of 20 parts per million (ppm); or 5) 8 hour CO standard of 9.0 ppm; or 6) 1 hour NO ₂ standard of 0.18 ppm; or 7) 24 hour PM ₁₀ and PM _{2.5} standards (operation) of 2.5 µg/m ³ . Each HVAC system design shall contain such specifications, including but not limited to an appropriate American Society of Heating, Refrigerating and Air-Conditioning Engineers (ASHRAE) minimum efficiency reporting value (MERV) for HVAC filters, as	2004 New Construction Program EIR Mitigation Measures, adopted by the Board of Education on June 2004. AQ-4.1.

4. Program Description

Table 4-1 LAUSD Standard Conditions of Approval Standards

PDF Reference #	Topic	Trigger for Compliance	Implementation Phase	Standard Conditions of Approval Standard Conditions	Original Location of original text; some updates have been made Source
				necessary to mitigate impacts to less than significant levels. The LAUSD shall implement all other measures to reduce health risks to acceptable levels as identified and recommended in the HRA. The HVAC system design specifications and requirements in addition to all other identified measures shall be noted and/or reflected on all building plans submitted to the Division of the State Architect.	
SC-AQ-5	Air Pollutant Emissions	Increases student capacity and/or generates additional traffic	During school operation	LAUSD shall encourage ride-sharing programs for students and teachers as well as maintain fleet vehicles such as school buses, maintenance vehicles, and other service fleet vehicles in good condition in order to prevent significant increases in air pollutant emissions created by operation of a new school.	LAUSD Best Management Practices, adopted by the Board of Education on June 2004 as part of the 2004 program EIR Program EIR.
BIOLOGICAL RESOURCES					
Project Design Features					
SC-BIO-1	Sensitive species habitat identification, impacts, and mitigation	When a project may affect sensitive species and/or their habitat within or near a project site; if a project will alter surface drainage in a way that affects sensitive species and/or their habitat-	As part of the site-specific CEQA review process; Agency-agency coordination prior to the start of construction; mitigation-monitoring during construction	LAUSD qualified biologist shall identify sensitive species and their habitat within or near proposed project site. LAUSD will conduct a literature search, which shall consider a one-mile radius beyond the project construction site and shall be performed by a qualified biologist with knowledge of local biological conditions as well as the use and interpretation of the data sources identified below. Where appropriate, in the opinion of the biologist, the literature search shall be supplemented with a site visit and/or aerial photo analysis. Resources and information that shall be investigated for each site should include, but not be limited to: <ul style="list-style-type: none"> Local offices of the USFWS; National Marine Fisheries Services (NMFS); CDFG CDFW; California Native Plant Society (CNPS) County and/or City planning or environmental offices for Sensitive sensitive Species-species, habitat, and/or heritage trees concerns that may not exist on published databases. These agencies can be consulted verbally or in writing. CNDDB CNPS Rare Plant Inventory Local Audubon Society Los Angeles County Department of Regional Planning for information on Significant Ecological Areas California Digital Conservation Atlas for district-wide location of reserves, plan areas, and land trusts that may overlap with project sites. <p style="text-align: center;"><small>Additional Determination</small></p> <u>Biological Resources Report</u>	2004 New Construction Program EIR Mitigation Measures <u>B-1.1</u> and <u>B-1.2</u> , adopted by the Board of Education on June 2004. <u>Recommendations as listed in CDFW SUP Draft EIR comment letter dated August 4, 2014, B-1.1 and B-1.2</u>

4. Program Description

Table 4-1 LAUSD Standard Conditions of Approval Standards

PDF Reference #	Topic	Trigger for Compliance	Implementation Phase	Standard Conditions of Approval Standard Conditions	Original Location of original text; some updates have been made Source
				<p>In the biological resources report, the biologist shall recommend mitigation measures that may be necessary to reduce impacts on sensitive species to less than significant. Where <u>If the LAUSD qualified biologist determines that a school construction project may will have a significant impact on</u> affect an identified sensitive species <u>plant, animal, or habitat, a</u> biological resources report shall be prepared. <u>To provide a complete assessment of the flora and fauna within and adjacent to a site-specific project impact area, with particular emphasis on identifying endangered, threatened, sensitive, and locally unique species and sensitive habitats, the biological resources report shall include the following.</u></p> <ul style="list-style-type: none"> • <u>Information on regional setting that is critical to the assessment of rare or unique resources</u> • <u>A thorough, recent floristic-based assessment of special status plants and natural communities, following the CDFW's <i>Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities</i>. CDFW recommends that floristic, alliance- and/or association-based mapping and vegetation impact assessments be conducted at the project site and neighboring vicinity. The <i>Manual of California Vegetation (Sawyer et al.)</i> should also be used to inform this mapping and assessment. Adjoining habitat areas should be included in this assessment where site activities could lead to direct or indirect impacts offsite. Habitat mapping at the alliance level will help establish baseline vegetation conditions.</u> • <u>A current inventory of the biological resources associated with each habitat type onsite and within the area of potential effect. CDFW's California Natural Diversity Data Base (CNDDB) should be contacted to obtain current information on any previously reported sensitive species and habitat, including Significant Natural Areas identified under Chapter 12 of the Fish and Game Code.</u> • <u>An inventory of rare, threatened, and endangered, and other sensitive species onsite and within the area of potential effect. Species to be addressed should include all those identified in CEQA Guidelines Section 15380, including sensitive fish, wildlife, reptile, and amphibian species. Seasonal variations in use of the project area should also be addressed. Focused species-specific surveys, conducted at appropriate time of year and time of day when sensitive species are active or otherwise identifiable, are required. Acceptable species-specific survey procedures should be developed in consultation with the CDFW and USFWS.</u> • <u>A discussion of the potential adverse impacts from light, noise, human activity, exotic species, and drainage. Drainage analysis should address project-related changes on drainage patterns on and downstream from the site: the volume, velocity, and frequency of existing and post- project surface flows; polluted runoff;</u> 	

4. Program Description

Table 4-1 LAUSD Standard Conditions of Approval Standards

PDF Reference #	Topic	Trigger for Compliance	Implementation Phase	Standard Conditions of Approval Standard Conditions	Original Location of original text; some updates have been made Source
				<p>soil erosion and/or sedimentation in streams and water bodies; and post-project fate of runoff from the project site.</p> <ul style="list-style-type: none"> • <u>Discussions about direct and indirect project impacts on biological resources, including resources in nearby public lands, open space, adjacent natural habitats, wetland and riparian ecosystems, and any designated and/or proposed or existing reserve lands (e.g., preserve lands associated with a NCCP). Impacts on, and maintenance of, wildlife corridor/movement areas, including access to undisturbed habitats in adjacent areas.</u> • <u>Mitigation measures for adverse project-related impacts to sensitive plants, animals, and habitats. Measures should emphasize avoidance and reduction of biological impacts. For unavoidable impacts, onsite habitat restoration or enhancement should be outlined. If onsite measures are not feasible or would not be biologically viable, offsite measures through habitat creation and/or acquisition and preservation in perpetuity should occur. This measure should address restrictions on access, proposed land dedications, monitoring and management programs, control of illegal dumping, water pollution, increased human intrusion, etc.</u> • <u>Plans for restoration and vegetation shall be prepared by qualified biologist with expertise in southern California ecosystems and native plant vegetation techniques. Plans shall include, at a minimum:</u> <ul style="list-style-type: none"> - <u>location of the mitigation site</u> - <u>plant species to be used, container sizes, and seeding rates</u> - <u>schematic depicting the mitigation area</u> - <u>planting schedule</u> - <u>irrigation method</u> - <u>measures to control exotic vegetation</u> - <u>specific success criteria</u> - <u>detailed monitoring program</u> - <u>contingency measures should the success criteria not be met</u> - <u>identification of the party responsible for meeting the success criteria and providing for conservation of the site in perpetuity.</u> <p>LAUSD shall consult with the <u>U.S. Army Corps of Engineers, USFWS and/or the CDFW</u> and comply with any permit conditions or directives from those agencies regarding the protection, relocation, creation, and/or mitigation compensation. LAUSD shall replace or restore affected habitat and surface drainage as required by the USFWS, CDFW and/or the U.S. Army Corps of Engineers.</p>	
SC-BIO-2	Light impacts	If a project includes N	During lighting	LAUSD shall protect sensitive species from harmful exposure to light by shielding light	2004 New Construction Program EIR

4. Program Description

Table 4-1 LAUSD Standard Conditions of Approval Standards

PDF Reference #	Topic	Trigger for Compliance	Implementation Phase	Standard Conditions of Approval Standard Conditions	Original Location of original text; some updates have been made Source
	Impacts to sensitive Sensitive species Species	new outdoor lighting that is near sensitive species habitat-	installation and prior to first use of lights	sources, redirecting light sources, or using low intensity lighting.	Mitigation Measures B-1.3 , adopted by the Board of Education on June 2004. B-1.3
SC-BIO-3	Bird and Bat Nesting Sites	Project site or construction site tagging are near and/or cause direct disturbances to native and nonnative vegetation, structures, and/or substrates tree or building removal is required during nesting season (March-February 1 through August 31; as early as January 1 for some raptors); and native bird species have been identified.	Prior to start of construction	LAUSD shall comply with the following either: <ul style="list-style-type: none"> Project activities (including, but not limited to, staging and disturbances to native and nonnative vegetation, structures, and substrates⁵¹) should occur outside of avian breeding season to avoid take of birds or their eggs.⁵² Depending on the avian species present, a qualified biologist may determine that a change in the breeding season dates is warranted. If avoidance of the avian breeding season is not feasible, Retain a qualified biologist to conduct an intensive nest search in all trees and buildings slated for removal before construction begins. If nests with young are found, the LAUSD shall not remove the trees until the young have fledged or the nest has been abandoned; or, Delay tree or building removal until between September 1 and February 28 to ensure reproductive success for native species using the site for nesting beginning 30 days prior to the initiation of the project activities, a qualified biologist with experience in conducting breeding bird surveys shall conduct weekly bird surveys to detect protected native birds occurring in suitable nesting habitat that is to be disturbed and (as access to adjacent areas allows) any other such habitat within 300 feet of the disturbance area (within 500 feet for raptors). The surveys shall continue on a weekly basis with the last survey being conducted no more than three days prior to the initiation of project activities. If a protected native bird is found, LAUSD shall delay all project activities within 300 feet of the suitable nesting habitat (within 500 feet for suitable raptor nesting habitat) until August 31. Alternatively, the qualified biologist could continue the surveys in order to locate any nests. If an active nest is located, project activities within 300 feet of the nest (within 500 feet for raptor nests), or as determined by a qualified biologist, shall be postponed until the nest is vacated and juveniles have fledged and there is no evidence of a second attempt at nesting. Flagging, stakes, and/or construction fencing shall be used to demarcate the inside boundary of the 300- or 500-foot buffer between the project activities and the nest. Project personnel, including all contractors working on site, shall be 	2004 New Construction Program EIR Mitigation Measures B-1.4 , adopted by the Board of Education on June 2004. Recommendations as listed in CDFW SUP Draft EIR comment letter dated August 4, 2014. B-1.4

⁵¹ Substrate is the surface on which a plant or animal lives.

⁵² Take means to hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture or kill (Fish and Game Code Section 86), and includes take of eggs and/or young resulting from disturbances that cause abandonment of active nests.

4. Program Description

Table 4-1 LAUSD Standard Conditions of Approval Standards

PDF Reference #	Topic	Trigger for Compliance	Implementation Phase	Standard Conditions of Approval Standard Conditions	Original Location of original text; some updates have been made Source
				<p>instructed on the sensitivity of the area. LAUSD shall provide results of the recommended protective measures to document compliance with applicable State and Federal laws pertaining to the protection of native birds.</p> <ul style="list-style-type: none"> • If the qualified biologist determines that a narrower buffer between the project activities and observed active nests is warranted, a written explanation as to why (e.g., species-specific information; ambient conditions and birds' habituation to them; and the terrain, vegetation, and birds' lines of sight between the project activities and the nest and foraging areas) shall be submitted to LAUSD OEHS project manager. Construction contractors can then reduce the demarcated buffer. • No construction shall occur within the fenced next zone until the young have fledged, are no longer being fed by the parents, have left the nest, and will no longer be impacted by the construction. • A biological monitor shall be present on site during all grubbing and clearing of vegetation to ensure that these activities remain outside the demarcated buffer and that the flagging, stakes, and/or construction fencing are maintained, and to minimize the likelihood that active nests are abandoned or fail due to project activities. The biological monitor shall send weekly monitoring reports to LAUSD OEHS project manager during the grubbing and clearing of vegetation, and shall notify LAUSD immediately if project activities damage avian nests.- 	
SC-BIO-4	Mature Native Oak Trees	If project requires the removal of one or more any native healthy mature oak trees or woodland habitat.	During construction	<p>LAUSD shall comply with the following:</p> <p>—Mitigation shall not include translocation of rare plants. LAUSD shall follow options will occur:</p> <ul style="list-style-type: none"> • CDFW, in most cases does not recommend translocation, salvage, and/or transplantation of rare, threatened, or endangered plant species, in particular oak trees, as compensation for adverse effects because successful implementation of translocation is rare. Even if translocation is initially successful, it will typically fail to persist over time. <p><u>Permanent conservation of habitat</u> —To ensure the conservation of sensitive plant species, the preferred method is permanent conservation of habitat containing these species; any translocation proposed shall only be an experimental component of a larger, more robust plan.</p> <p><u>Off-site acquisition of woodland habitat</u> —Due to the inherent difficulty in creating functional woodland habitat with associated understory components, the preferred method is off-site acquisition of</p>	<p>2004 New Construction Program EIR Mitigation Measure B-3.1, adopted by the Board of Education on June 2004.</p> <p>Recommendations as listed in CDFW SUP Draft EIR comment letter dated August 4, 2014.</p>

4. Program Description

Table 4-1 LAUSD Standard Conditions of Approval Standards

PDF Reference #	Topic	Trigger for Compliance	Implementation Phase	Standard Conditions of Approval Standard Conditions	Original Location of original text; some updates have been made Source
				<p>woodland habitat in the local area. All acquired habitat shall be protected under a conservation easement and deeded to a local land conservancy for management and protection.</p> <p><u>Creation of oak woodlands</u> Relocate the tree(s) to another location on the property where the conditions are favorable to survival. Any creation of functioning woodlands shall be of similar composition, structure, and function of the affected oak woodland. The new woodland shall mimic the function, demonstrate recruitment, plant density, and percent basal canopy, and vegetation cover, as well as other measurable success criteria before the measure is deemed a success.</p> <ul style="list-style-type: none"> - All seed and shrub sources used for tree and understory species in the new planting site shall be collected or grown from on-site sources or from adjacent areas and shall not be purchased from a supplier. This method should reduce the risk of introducing diseases and pathogens into areas where they might not currently exist. - Oaks should be replaced by planting acorns because this has been shown to result in greater oak survival. Monitoring efforts, including the exclusion of herbivores, shall be employed to maximize seedling survival during the monitoring period. - Monitoring period for oak woodland shall be at least 10 years with a minimum of seven years without supplemental irrigation. This allows the trees to go through one typical drought cycle. This should also be the minimal time needed to see signs of stress and disease and determine the need for replacement plantings. <ol style="list-style-type: none"> 1. LAUSD shall request CDFW review and comment on any translocation plans, habitat preservation, habitat creation and/or restoration plans. 2. Replace each healthy mature oak tree within the same property boundaries with at least two new oak trees; or <ul style="list-style-type: none"> • If the options 1 and 2 are not feasible, then LAUSD shall plant a different native species as replacement. 	
SC-BIO-5	Wetlands, Riparian Habitat, and other	May affect wetlands, riparian habitat, and other sensitive natural community	As part of the site-specific CEQA review process; agency coordination	<p>LAUSD shall comply with CDFW recommendations as listed below:⁵³</p> <ul style="list-style-type: none"> • Project development or conversion that results in a reduction of wetland acreage or wetland habitat values shall not occur unless, at a minimum, replacement or preservation results in "no net loss" of either wetland habitat values or acreage. 	2004 New Construction Program EIR Mitigation Measures B-1.1 and B-1.2, adopted by the Board of Education on June 2004.

⁵³ Recommendations as listed in CDFW SUP Draft EIR comment letter dated August 4, 2014.

4. Program Description

Table 4-1 LAUSD Standard Conditions of Approval Standards

PDF Reference #	Topic	Trigger for Compliance	Implementation Phase	Standard Conditions of Approval Standard Conditions	Original Location of original text; some updates have been made Source
	<u>Sensitive Natural Community</u>		<u>prior to the start of construction; monitoring during and after construction</u>	<ul style="list-style-type: none"> • All wetlands and watercourses, whether intermittent or perennial, should be retained and provided with substantial setbacks which preserve the riparian and aquatic values and maintain their value to on-site and off-site wildlife populations. • A jurisdictional delineation of creeks and their associated riparian habitats shall be conducted as part of the biological resources report. The delineation should be conducted pursuant to the USFWS wetland definition. • Implementation of recommended measures shall compensate for affected mature riparian corridors and loss of function and value of wildlife corridors. 	Recommendations as listed in CDFW SUP Draft EIR comment letter dated August 4, 2014. 2004 New Construction Program EIR Mitigation Measures, adopted by the Board of Education on June 2004. B-3.1
CULTURAL RESOURCES					
Standard Conditions					
<u>SC-CUL-100 Compliance</u>	Cultural Resource Assessment Procedures	If a project may affect historic resources-	Prior to project approval	OEHS CEQA Specification Manual, Appendix H, Historical Resources Policy. This document establishes assessment methodology and procedures for the identification and analysis of historical resources, unique archaeological resources, and paleontological resources pursuant to the CEQA.	LAUSD OEHS CEQA Specification Manual, Appendix H, Historical Resources Policy, (Appendix E.2) LAUSD Cultural Resource Assessment Procedures, December 2005, Revised June 2007.
Project Design Features					
<u>SC-CUL-42</u>	Architectural Character	If a project may affect historic buildings or structures-	During project design	School Design Guide. LAUSD shall re-use rather than destroy historical resources, where feasible. LAUSD shall take the following steps when dealing with historical resources: <ul style="list-style-type: none"> • Retain and preserve the historic character of a building, structure, or site, where feasible. • Treat distinctive architectural features or examples of skilled craftsmanship that characterize a building with sensitivity, where feasible. • Conceal reinforcement required for structural stability or the installation of life safety or mechanical systems, wherever feasible. • Undertake surface cleaning of historic structures with the gentlest means possible. Avoid sandblasting and chemical treatments 	School Design Guide. Los Angeles Unified School District. January 2014.
<u>SC-CUL-3</u>	<u>Architectural Character</u>	<u>May affect historic buildings or structures</u>	<u>During project design</u>	Design Guidelines and Treatment Approaches for Historic Schools. This document outlines the use of design guidelines as an effective tool for planning and implementing projects that avoid significant adverse impacts to historic resources.	<u>Design Guidelines and Treatment Approaches for Historic Schools, January 2015.</u>
<u>SC-CUL-24</u>	Historical Resource Assessment	If a Cultural Resource Assessment identifies historic resources on or near a proposed project site	During project design and prior start of CEQA document	LAUSD shall engage a design team, consisting of an architect and structural engineer, as necessary, with five (5) years' experience applying the Secretary of the Interior's Standards for the Treatment of Historic Properties. The Design Team, in consultation with the Master Reviewer, shall consider whether and to what extent the proposed project could have a significant impact on the site's historical resources. If the Design Team determines that the proposed project could have a significant impact on the site's	2004 New Construction Program EIR Mitigation Measures <u>C-1.1</u> , adopted by the Board of Education on June 2004. C-1.1

4. Program Description

Table 4-1 LAUSD Standard Conditions of Approval Standards

PDF Reference #	Topic	Trigger for Compliance	Implementation Phase	Standard Conditions of Approval Standard Conditions	Original Location of original text; some updates have been made Source
				historical resources, and the Master Reviewer concurs with that determination, the Design Team shall develop and consider mitigation measures and alternatives that could minimize, avoid or substantially reduce the impacts.	
<u>SC-CUL-35</u>	Historical Resource Assessment	For projects involving the relocation, conversion, rehabilitation, or alteration of an historical resource, or construction in the immediate surroundings of an historical resource.	During project design and prior start of CEQA document	LAUSD shall develop at least one alternative that either (1) complies with the Secretary of the Interior's Standards for the Treatment of Historic Properties, or (2) otherwise avoids material impairment of the historical resource. LAUSD need not adopt any such alternative unless the LAUSD Board of Education determines that the alternative is feasible within the meaning of PRC Section 21061.1 and necessary to avoid a significant impact on historical resources.	2004 New Construction Program EIR Mitigation Measures <u>C-1.2</u> , adopted by the Board of Education on June 2004. C-1.2
<u>SC-CUL-46</u>	Historical Resource Preservation	For projects involving the relocation, conversion, rehabilitation or alteration of an historical resource, or construction in the immediate surroundings of an historical resource, and if compliance with the Secretary's Standards or avoidance of a material impairment of the historical resources is adopted as a site-specific project mitigation measure or alternative.	During design development phase, and implementation of mitigation measures.	LAUSD shall retain a preservation architect meeting the Secretary of the Interior's Professional Qualifications Standards in historic architecture (preservation architect) to review and comment upon project plans through the design development phase for conformance with the adopted mitigation measure or alternative.	2004 New Construction Program EIR Mitigation Measures <u>C-1.3</u> , adopted by the Board of Education on June 2004. C-1.3
<u>SC-CUL-57</u>	Historical Resource Preservation	<u>May affect historic buildings or structures</u> For projects that may impact an historical resource	During pre-construction and construction monitoring activities	The preservation architect shall participate in pre-construction and construction monitoring activities to ensure continuing conformance with Secretary's Standards and/or avoidance of a material impairment of the historical resources.	2004 New Construction Program EIR Mitigation Measures <u>C-1.4</u> , adopted by the Board of Education on June 2004. C-1.4
<u>SC-CUL-68</u>	Historical	if a project or any	Prior to demolition or	LAUSD shall retain a professional architectural photographer and an architectural	2004 New Construction Program EIR

4. Program Description

Table 4-1 LAUSD Standard Conditions of Approval Standards

PDF Reference #	Topic	Trigger for Compliance	Implementation Phase	Standard Conditions of Approval Standard Conditions	Original Location of original text; some updates have been made Source
	Resource Documentation #	project alternative D includes the demolition or potential damage to any recognized historic resources or any contributors to a historic district-	alteration	<p>historian that meets the Secretary of the Interior's Professional Qualifications Standards (Architectural Historian) to implement Historic American Building Survey (HABS) Level II documentation or closely following the HABS Level II outline format. Documentation shall include drawings, photographs, and written data for each building/structure/element. For all levels of documentation, the following quality standards shall be met:</p> <p>Large format photographs: Photographic documentation shall include of the current status of all recognized historic resources or any contributors to a historic district and the existing surrounding setting. Large format photographs shall clearly depict the appearance of the property and areas of significance of the recorded building, site, structure, or object. Each view shall be perspective corrected and fully captioned. All shall be archivally processed and prints shall be made on fiber-based paper. Two original negatives (large format 4-inch by 5-inch black and white negatives) shall be made at the time the photographs are taken, two sets of contact prints, and three sets of 8-inch by 10-inch prints shall be processed.</p> <ul style="list-style-type: none"> • one set of negatives and one set of contact prints shall be archived at the National Park Service for entry into the HABS collection in the Library of Congress • one set of negatives and one set prints shall be archived at Los Angeles Public Library at the Central Library. • one set of prints shall be archived at the Los Angeles City Historical Society. • one set of prints shall be archived at LAUSD. <p>Narrative description: 1) Written history and description shall be based on primary sources to the greatest extent possible. A frank assessment of the reliability and limitations of sources shall be included. Within the written history, statements shall be footnoted as to their sources, where appropriate. The written data shall include a methodology section specifying name of researcher, date of research, sources searched, and limitations of the project; 2) the architectural historian shall prepare a narrative description (closely following the Historic American Buildings Survey Level II outline format) of historical architectural resources, including Department of Parks and Recreation (DPR) series forms.</p> <p>Document Submittal: The draft documentation shall be assembled by the architectural historian and submitted to the LAUSD Architectural Master Reviewer for review and comment. Architectural Master Reviewer shall give final approval prior and receive final documentation prior to submittal to the repositories and prior to work on the project. LAUSD shall submit the LAUSD-approved final documentation to the Los Angeles</p>	Mitigation Measures C-1.5, adopted by the Board of Education on June 2004. C-1.5

4. Program Description

Table 4-1 LAUSD Standard Conditions of Approval Standards

PDF Reference #	Topic	Trigger for Compliance	Implementation Phase	Standard Conditions of Approval Standard Conditions	Original Location of original text; some updates have been made Source
				Public Library at the Central Library and the South Central Coastal Information Center.	
SC-CUL-79	Historical Resource Notification	For projects where LAUSD has identified historical resources on the site.	As part of the public review process	LAUSD shall provide OHP and the Los Angeles Conservancy copies of all negative declarations and environmental impact reports.	2004 New Construction Program EIR Mitigation Measures C-1.6 , adopted by the Board of Education on June 2004 (revised). C-1.6
SC-CUL-810	Historical Resource Reuse	If a project or any project alternative includes the D demolition of any of the recognized historic structures	Prior to demolition or alteration	LAUSD, consistent with Education Code Section 17540, shall offer to sell any useful features of the school building (e.g., the school bell, chalkboards, lockers, etc.) that do not contain hazardous materials for use or display, if features are not retained by LAUSD for reuse or display.	none NEW
SC-CUL-911	Historical Resource Reuse	If a project or any project alternative includes the D demolition of any of the recognized historic structures	Prior to demolition or alteration	LAUSD, consistent with Education Code Section 17545, shall offer for sale any remaining functional and defining features and building materials from the buildings. These materials could include doors, windows, siding, stones, lighting, doorknobs, hinges, cabinets, and appliances, among others. They shall be made available to the public for sale and reuse, if features are not retained by LAUSD for reuse or display.	none NEW
SC-CUL-1012	Archaeological Resource	If the P project area is deemed highly sensitive for archaeological resources-	Prior to and during grading, excavation, or other ground-disturbing activities	LAUSD shall retain a qualified archaeologist to be available on-call. The qualified archaeologist shall meet the Secretary of the Interior's Professional Qualifications Standards (48 Federal Register 44738-39).	NEW none
SC-CUL-1113	Historic and Archaeological Resource	If H historical or unique archaeological resources are discovered during construction activities-	During grading, excavation, or other ground-disturbing activities	The contractor shall halt construction activities in the immediate area and notify the LAUSD. LAUSD shall retain a qualified archeologist to make an immediate evaluation of significance and appropriate treatment of the resource. To complete this assessment, the qualified archeologist will be afforded the necessary time to recover, analyze, and curate the find. The qualified archeologist shall recommend the extent of archeological monitoring necessary to ensure the protection of any other resources that may be in the area. Construction activities may continue on other parts of the building site while evaluation and treatment of historical or unique archaeological resources takes place.	2004 New Construction Program EIR Mitigation Measures C-1.7 , adopted by the Board of Education on June 2004. C-1.7
SC-CUL-1214	Archaeological Resource Monitoring Program	When a Phase I Archaeological Site Investigation shows a strong possibility that unique resources, and/or unique	Prior to the start of construction	LAUSD shall implement an archaeological monitoring program for construction activities at a site prepared by a qualified archaeologist under the following conditions: (1) when a Phase I Site Investigation shows a strong possibility that unique archeological resources are buried on the site; and/or (2) when unique architectural resources have been identified on a site, but LAUSD does not implement a Phase III Data Recovery/Mitigation Program because the resources can be recovered through	2004 New Construction Program EIR Mitigation Measures C-1.8 , adopted by the Board of Education on June 2004. C-1.8

4. Program Description

Table 4-1 LAUSD Standard Conditions of Approval Standards

PDF Reference #	Topic	Trigger for Compliance	Implementation Phase	Standard Conditions of Approval Standard Conditions	Original Location of original text; some updates have been made Source
		architectural resources have been identified on a site-		the archaeological monitoring program.	
SC-CUL-13 SC-CUL-15	Archaeological Resource	If any E-evidence of prehistoric or historic cultural resources is uncovered-	During grading, excavation, or other ground-disturbing activities	All work shall stop within a 30-foot radius of the discovery. Work shall not continue until the discovery has been evaluated by a qualified archaeologist. The qualified archaeologist shall assess the find(s) and, if it is determined to be of value, shall draft a monitoring program and oversee the remainder of the grading program. Should evidence of prehistoric or historic cultural resources be found the archaeologist shall monitor all ground-disturbing activities related to the proposed project. Any significant archaeological resources found shall be preserved as determined necessary by the archaeologist and offered to a local museum or repository willing to accept the resource. Any resulting reports shall also be forwarded to the South Central Coastal Information Center at the California State University, Fullerton.	none NEW
SC-CUL-14 SC-CUL-16	Archaeological Resource	If project construction requires archaeological monitoring	Prior to the start grading, excavation, or other ground-disturbing activities	Cultural resources sensitivity training shall be conducted by a qualified archaeologist for all construction workers involved in moving soil or working near soil disturbance. This training shall review the types of archaeological resources that might be found, along with laws for the protection of resources.	none NEW
SC-CUL-15 SC-CUL-17	Archaeological Resource	When unique archaeological resources are discovered and LAUSD determines not to avoid them by abandoning the site or redesigning the project	During grading, excavation, or other ground-disturbing activities	LAUSD shall determine whether it is feasible to prepare and implement a Phase III Data Recovery/Mitigation Program. A Phase III Data Recovery/Mitigation Program would be designed by a Qualified Archaeologist to recover a statistically valid sample of the archaeological remains and to document the site to a level where the impacts can be determined to be less than significant. All documentation shall be prepared in the standard format of the ARMR Guidelines, as prepared by the OHP. Once a Phase III Data Recovery/Mitigation Program is completed, an archaeological monitor shall be present on site to oversee the grading, demolition activities, and/or initial construction activities to ensure that construction proceeds in accordance with the adopted Phase III Data Recovery/Mitigation Program. The extent of the Phase III Data Recovery/Mitigation Program and the extent and duration of the archaeological monitoring program depend on site-specific factors.	2004 New Construction Program EIR Mitigation Measures C-1.9 , adopted by the Board of Education on June 2004. C-1.9
SC-CUL-16 SC-CUL-18	Native American Resource	If evidence of Native American resources is uncovered	During grading, excavation, or other ground-disturbing activities	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.	none NEW
SC-CUL-17 SC-CUL-19	Paleontological Resource	If the Cultural Resources Assessment identifies a project area as sensitive for paleontological	During grading, excavation, or other ground-disturbing activities	LAUSD shall have a paleontological monitor on-call during construction activities. This monitor shall provide the construction crew(s) with a brief summary of the sensitivity, the rationale behind the need for protection of these resources, and information on the initial identification of paleontological resources. If paleontological resources are uncovered during construction, the on-call paleontologist shall be notified and afforded the necessary time and funds to recover, analyze, and curate the find(s). Subsequently, the monitor shall remain on	2004 New Construction Program EIR Mitigation Measures C-1.10 , adopted by the Board of Education on June 2004. C-1.10

4. Program Description

Table 4-1 LAUSD Standard Conditions of Approval Standards

PDF Reference #	Topic	Trigger for Compliance	Implementation Phase	Standard Conditions of Approval Standard Conditions	Original Location of original text; some updates have been made Source
		resources-		site for the duration of the ground disturbances to ensure the protection of any other resources that may be in the area.	
SC-CUL-2014	Paleontological Resource	If the project area is deemed highly sensitive for paleontological resources-	During grading, excavation, or other ground-disturbing activities	The paleontological monitor shall be on site for all ground altering activities and shall advise LAUSD as to necessary means of protecting potentially significant paleontological resources, including, but not limited to, possible cessation of construction activities in the immediate area of a find. If resources are identified during the monitoring program, the paleontologist shall be afforded the necessary time and funds to recover, analyze, and curate the find(s). Subsequently, the monitor shall remain on site for the duration of the ground disturbances to insure the protection of any other resources that may be in the area.	2004 New Construction Program EIR Mitigation Measures C-1.11, adopted by the Board of Education on June 2004. C-1.11
GEOLOGY AND SOILS					
Standard Conditions					
SC-GEO-010 Compliance	Seismic Hazards	For all projects that involve grading, excavation, or other ground-disturbing activities	During project design, and project construction	OEHS CEQA Specification Manual, Appendix G, Supplemental Geohazard Assessment Scope of Work. This document outlines the procedures and scope for LASUD geohazard assessments.	LAUSD OEHS CEQA Specification Manual, Appendix G, Supplemental Geohazard Assessment Scope of Work. December 2005, Revised June 2007.
GREENHOUSE GAS EMISSIONS					
Standard Conditions					
SC-USS-10 Compliance	Construction waste-Waste management Management	When projects will generate construction and/or demolition debris	Prior to start of and during construction	School Design Guide, & Specification 01340, Construction & Demolition Waste Management Construction and demolition waste shall be recycled to the maximum extent feasible. LAUSD has established a minimum non-hazardous construction and demolition debris recycling requirement of 75% by weight as defined in Specification 01340, Construction & Demolition Waste Management. (School Design Guide, January 2014) Specification 01340, Construction & Demolition Waste Management- Specification Guide Specifications 2004 - Section -01340, Construction & Demolition Waste Management. This section of the LAUSD Specifications includes procedures for preparation and implementation, including reporting and documentation, of a Waste Management Plan for reusing, recycling, salvage or disposal of non-hazardous waste materials generated during demolition and/or new construction (Construction & Demolition (C&D) Waste), to foster material recovery and re-use and to minimize disposal in landfills. Requires the collection and separation of all C&D waste materials generated on-site, reuse or recycling on-site, transportation to approved recyclers or reuse organizations, or	<ul style="list-style-type: none"> • School Design Guide. January 2014; • Specification 01340, Construction & Demolition Waste Management, July 7, 2003; • LAUSD Best Management Practices, adopted by the Board of Education on June 2004 as part of the 2004 program EIR/Program EIR; • Guide Specifications 2004. Division 1. Section 01340, Construction & Demolition Waste Management. July 7, 2003; • The Collaborative for High Performance Schools. High Performance Schools Best Practices Manual, Volume III-- Criteria.

4. Program Description

Table 4-1 LAUSD Standard Conditions of Approval Standards

PDF Reference #	Topic	Trigger for Compliance	Implementation Phase	Standard Conditions of Approval Standard Conditions	Original Location of original text; some updates have been made Source
				transportation to legally designated landfills, for the purpose of recycling salvaging and/or reusing a minimum of 75% of the C&D waste generated. (Specification 01340, Construction & Demolition Waste Management, July 7, 2003)	Version 1.0, November 1, 2001. Adopted by the Board of Education on October 28, 2003. Updated 2009 CHPS Scorecard with 2011 Amendments. Prerequisite. Construction Waste Management. ME2.0C.P1 and LAUSD 2014 School Design Guide.
Project Design Features					
SC-GHG-1	Water use Use and efficiency Efficiency	Requires if project include work on water pumps, valves, piping, and/or tanks-	During school operation	During school operation, LAUSD shall perform regular preventative maintenance on pumps, valves, piping, and tanks to minimize water loss.	LAUSD Best Management Practices, adopted by the Board of Education on June 2004 as part of the 2004 program EIR Program EIR
SC-GHG-2	Water use Use and efficiency Efficiency	Requires if projects involve work on landscape irrigation system-	Prior to full operation of irrigation system	LAUSD shall utilize automatic sprinklers set to irrigate landscaping during the early morning and evening hours to reduce water loss from evaporation.	LAUSD Best Management Practices, adopted by the Board of Education on June 2004 as part of the 2004 program EIR Program EIR
SC-GHG-3	Water use Use and efficiency Efficiency	Requires if projects involve work on landscape irrigation system-	Prior to full operation of irrigation system	LAUSD shall reset automatic sprinkler timers to water less during cooler months and during the rainy season.	LAUSD Best Management Practices, adopted by the Board of Education on June 2004 as part of the 2004 program EIR Program EIR
SC-GHG-4	Water use Use and efficiency Efficiency	Requires if projects involve work on landscape and/or irrigation system-	Prior to full operation of irrigation system	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.	The Collaborative for High Performance Schools. High Performance Schools Best Practices Manual, Volume III--Criteria. Version 1.0, November 1, 2001. Adopted by the Board of Education on October 28, 2003. Updated 2009 CHPS Scorecard with 2011 Amendments. Prerequisite. Construction Waste Management. WE1.0C.P1 and LAUSD 2014 School Design Guide.
SC-GHG-5	Energy efficiency Efficiency	If project involves a building construction	Prior to occupancy	LAUSD shall ensure that the time dependent valued energy of the proposed project design is at least 10 percent, with a goal of 20 percent less than a standard design that is in minimum compliance with the California Title 24, Part 6 energy efficiency standards that are in force at the time the project is submitted to the Division of the State Architect.	The Collaborative for High Performance Schools. High Performance Schools Best Practices Manual, Volume III--Criteria. Version 1.0, November 1, 2001. Adopted by the Board of Education on October 28, 2003. Updated 2009 CHPS

4. Program Description

Table 4-1 LAUSD Standard Conditions of Approval Standards

PDF Reference #	Topic	Trigger for Compliance	Implementation Phase	Standard Conditions of Approval	Standard Conditions	Original Location of original text; some updates have been made Source
						Scorecard with 2011 Amendments. Prerequisite: Energy Efficiency. EE1.0C.P1 and LAUSD 2014 School Design Guide.
HAZARDS and HAZARDOUS MATERIALS						
Standard Conditions are extensive. CEQA-related list identified below; see Section 5.8 for complete list and descriptions.						
SC-HAZ-100 Compliance	Electro-magnetic fields	Place new classrooms or outdoor play areas When a new occupied space is near power lines or cell towers	Prior to project approval	OEHS CEQA Specification Manual, Appendix LM, Criteria for School Siting in Proximity to High Voltage Power Lines. 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 radiofrequency exposures associated with cellular towers near schools whereby a prohibition exists regarding siting towers on school campuses.		LAUSD OEHS CEQA Specification Manual, Appendix LM, Criteria for School Siting in Proximity to High Voltage Power Lines. December 2005, Revised June 2007. Board of Education resolutions: • Effects of Non-Ionizing Radiation-2000 • Wireless Telecommunication Installations-2009 • T-Mobile Cell Tower Notification and Condemnation-2009
SC-HAZ-00 Compliance	Pipeline hazards	Place new classrooms or outdoor play areas When a occupied space is near hazardous pipelines	Prior to project approval	OEHS CEQA Specification Manual, Appendix ML, 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.		LAUSD OEHS CEQA Specification Manual, Appendix ML, Pipeline Safety Hazard Analysis. December 2005, Revised June 2007.
SC-HAZ-00 Compliance	Rail hazards	Place new classrooms or outdoor play areas When a occupied space is within 1,500 feet of a railroad track easement near rail road tracks	Prior to project approval	OEHS CEQA Specification Manual, Appendix K, Rail Safety Study Protocol. This document provides a guidance protocol for conducting a Rail Safety Study (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.		LAUSD OEHS CEQA Specification Manual, Appendix K, Rail Safety Study Protocol. December 2005, Revised June 2007.
SC-AQ-00 Compliance	Air Toxics Health Risk	Place new classrooms or outdoor play areas If project includes new occupied spaces	Prior to project approval	OEHS CEQA Specification Manual, Appendix J, Air Toxics Health Risk Assessment (HRA). This document includes guidance on HRA protocols for permitted, nonpermitted, and mobile sources that might reasonably be anticipated to emit hazardous air emissions		LAUSD OEHS CEQA Specification Manual, Appendix J, Air Toxics Health Risk Assessment (HRA). December 2005, Revised June 2007.

4. Program Description

Table 4-1 LAUSD Standard Conditions of Approval Standards

PDF Reference #	Topic	Trigger for Compliance	Implementation Phase	Standard Conditions of Approval Standard Conditions	Original Location of original text; some updates have been made Source
		within ¼-mile of emission sources		and result in potential long-term and short-term health impacts to student and staff at the school site. OEHS CEQA Specification Manual, Appendix J, Air Toxics Health Risk Assessment (HRA).	
HYDROLOGY and WATER QUALITY					
Standard Conditions					
SC-HWQ-00 Compliance1	Storm Water Requirements	Projects with Land disturbance-	During construction	Stormwater Technical Manual. This manual establishes design requirements and provides guidance for the cost-effective improvement of water quality in new and significantly redeveloped LAUSD school sites. These guidelines are intended to improve water quality and mitigate potential impacts to the Maximum Extent Practicable (MEP). While these guidelines meet current post-construction Standard Urban Stormwater Mitigation Plan (SUSMP) requirements. The guidelines address the mandated post-construction element of the NPDES program requirements.	Stormwater Technical Manual. Prepared for LAUSD by Geosyntec Consultants. October 2009.
SC-HWQ-00 Compliance2	Storm Water Requirements	Projects with Land disturbance-	During construction	Compliance Checklist for Storm Water Requirements at Construction Sites. This checklist has requirements for compliance with the General Construction Activity Permit and is used by OEHS to evaluate permit compliance. Requirements listed include a SWPPP; BMPs for minimizing storm water pollution to be specified in a SWPPP; and monitoring storm water discharges to ensure that sedimentation of downstream waters remains within regulatory limits	OEHS <u>Compliance Checklist for Storm Water Requirements at Construction Sites</u> .- No Date.
SC-HWQ-00 Compliance3	Miscellaneous Requirements	Ongoing maintenance and repair	During construction and operation	<ul style="list-style-type: none"> • Environmental Training Curriculum • Hazardous Waste Management Program • Medical Waste Management Program • Environmental Compliance Inspections • Safe School Inspections • Integrated Pest Management Program • Fats Oil and Grease Management Program • Solid Waste Management Program 	<ul style="list-style-type: none"> • <u>Environmental Training Curriculum</u> • <u>Hazardous Waste Management Program</u> • <u>Medical Waste Management Program</u> • <u>Environmental Compliance Inspections</u> • <u>Safe School Inspections</u> • <u>Integrated Pest Management Program</u> • <u>Fats Oil and Grease Management Program</u> • <u>Solid Waste Management Program</u>
Project Design Features					
SC-HWQ-14	Flood hazards/Hazar	If project requires S site acquisition	During project design	The analysis for new projects shall include evaluation of all possible flood hazards as determined by: (1) review of FEMA flood maps; (2) review of flood information provided	2004 New Construction Program EIR Mitigation Measures HWQ-5.1 , adopted

4. Program Description

Table 4-1 LAUSD Standard Conditions of Approval Standards

PDF Reference #	Topic	Trigger for Compliance	Implementation Phase	Standard Conditions of Approval Standard Conditions	Original Location of original text; some updates have been made Source
	ds			by local city or county floodplain managers; (3) review of California Department of Water Resources dam safety information; and, (4) local drainage analysis by a civil engineer. The flood hazard determination shall include consideration of tsunamis and debris flow. New projects should be located outside of these hazard areas, if practical.	by the Board of Education on June 2004. HWQ-5.1
<u>SC-HWQ-25</u>	Flood hazards Hazar ds	If project requires S site acquisition	During project design	Where placing the project outside the floodplain is impractical, the school or project structure shall be protected from flooding by containment and control of flood flows (e.g., elevating lowest floors at least one foot above the expected 100-year flood level).	2004 New Construction Program EIR Mitigation Measures, adopted by the Board of Education on June 2004. HWQ-5.2
<u>SC-HWQ-36</u>	Tsunami Hazards	<u>Place new classrooms or outdoor play areas</u> If occupied spaces are within 0.62 mile of the coast, and less than 100 feet above mean sea level-	Prior to classroom occupation	LAUSD shall evaluate tsunami hazards to determine if the project site is within a tsunami inundation zone as delineated by CalEMA or NOAA. If the project site is within a tsunami hazard zone LAUSD shall prepare and implement a tsunami awareness program and evacuation plan. This plan shall comply with the provisions of the LAUSD Emergency Operations Plan.	2004 New Construction Program EIR Mitigation Measures HWQ-5.3 , adopted by the Board of Education on June 2004. HWQ-5.3
<u>SC-HWQ-47</u>	Debris F low areas	<u>Place new classrooms or outdoor play areas</u> If classrooms are located in areas subject to potentially damaging debris flow-	During project design	LAUSD shall consult with the Los Angeles County Department of Public Works, and/or local city officials, as appropriate, regarding the debris flow potential near the mouth of or in natural canyons and feasible mitigation measures shall be developed to reduce any potential risk. Potential debris flow hazards shall be reduced by one or more of the following: adequate building setbacks from natural slopes, construction of debris control facilities in upstream areas, monitoring and maintaining potential debris flow areas and basins. In addition, potential loss shall be minimized by establishing an evacuation plan, and elevated awareness and early warning of pending events.	2004 New Construction Program EIR Mitigation Measures HWQ-5.4 , adopted by the Board of Education on June 2004. HWQ-5.4

NOISE

Project Design Features

<u>SC-AQ-42</u>	Construction emissions Nois e	R <u>If project requires</u> large construction equipment	During project construction	LAUSD's construction contractor shall ensure that construction equipment is properly tuned and maintained in accordance with manufacturer's specifications, <u>to ensure excessive noise is not generated by unmaintained equipment.</u>	LAUSD Best Management Practices, adopted by the Board of Education on June 2004 as part of the 2004 program EIR Program EIR .
<u>SC-N-1</u>	Exterior campus noise <u>Campus noise</u>	If projected <u>E</u> exterior noise levels on a new <u>site is are or would be</u> greater than 70 dBA L ₁₀ or 67 dBA L _{eq}	During project design	The LAUSD shall include features such as sound walls, building configuration, and other design features in order to attenuate exterior noise levels on a school campus to less than 70 dBA L ₁₀ or 67 dBA L _{eq} .	2004 New Construction Program EIR Mitigation Measures N-1.1 , adopted by the Board of Education on June 2004. N-1.1
<u>SC-N-2</u>	Interior classroom Classroom	If projected interior classroom noise levels is <u>would be</u> greater	During project design	The LAUSD shall analyze the acoustical environment of the site (such as traffic) and the characteristics of planned building components (such as heating, ventilation, and air conditioning [HVAC]), and design to achieve interior classroom noise levels of less than	2004 New Construction Program EIR Mitigation Measures N-1.2 , adopted by the Board of Education on June 2004.

4. Program Description

Table 4-1 LAUSD Standard Conditions of Approval Standards

PDF Reference #	Topic	Trigger for Compliance	Implementation Phase	Standard Conditions of Approval Standard Conditions	Original Location of original text; some updates have been made Source
	noise Noise	than 55 dBA L ₁₀ or 45 dBA L _{eq}		<p>55 dBA L₁₀ or 45 dBA L_{eq} with maximum (unoccupied) reverberation times of 0.6 seconds. Noise reduction methods shall include, but are not limited to, features such as sound walls, building and/or classroom insulation, HVAC modifications, double-paned windows, and other design features in order to achieve the noise standards.</p> <ul style="list-style-type: none"> • <u>The District should acknowledge the ANSI (American National Standards Institute) S12 standard as a District goal that may presently not be achievable in all cases.</u> • <u>Where economically feasible, new school design should achieve classroom acoustical quality consistent with the ANSI standard and in no event exceed the current CHPS (California High Performance Schools) standard of 45 dBA.</u> • <u>Where economically feasible, new HVAC (Heating, Ventilating, and Air Conditioning) installations should be designed to achieve the lowest possible noise level consistent with the ANSI standard. In no event should these installations exceed the current CHPS standard of 45 dBA.</u> • <u>To promote the development of lower noise emitting HVAC units, the District's purchase of new units should give preference to manufacturers producing the lowest noise level at the lowest cost.</u> • <u>Existing HVAC units operating in excess of 50 dBA should be modified.</u> 	N-1.2
SC-N-3	Traffic noise	Where <u>Project-related traffic noise levels exceeds local noise standards, policies, or ordinances.</u>	Prior to project approval	LAUSD shall require an acoustical analysis to identify feasible measures to reduce traffic noise increases to 3 dBA CNEL or less at the noise-sensitive land use. LAUSD shall implement recommended measures to reduce noise.	2004 New Construction Program EIR Mitigation Measures N-2.1 , adopted by the Board of Education on June 2004. N-2.1
SC-N-4	<u>Operational Noise</u> Noise-sensitive land uses	Where <u>Operational project related school noise levels will exceeds local noise standards, policies, or ordinances at noise-sensitive land uses.</u>	During project design and construction	<p>LAUSD shall incorporate <u>long-term permanent noise attenuation measures</u> buffer zones, sound barriers (such as buildings, masonry walls, enclosed bleacher foot wells, or other special design features) between playgrounds, stadiums, and other noise-generating facilities and <u>adjacent residential or noise-sensitive land uses</u>, to reduce noise levels to meet jurisdictional standards or an increase of 3 dB or less over ambient.</p> <p><u>Operational noise attenuation measures include, but are not limited to:</u></p> <ul style="list-style-type: none"> • <u>buffer zones</u> • <u>berms</u> • <u>sound barriers:</u> <ul style="list-style-type: none"> - <u>buildings</u> - <u>masonry walls</u> - <u>enclosed bleacher foot wells</u> - <u>other site-specific project design features.</u> 	2004 New Construction Program EIR Mitigation Measures N-2.2 , adopted by the Board of Education on June 2004. N-2.2

4. Program Description

Table 4-1 LAUSD Standard Conditions of Approval Standards

PDF Reference #	Topic	Trigger for Compliance	Implementation Phase	Standard Conditions of Approval Standard Conditions	Original Location of original text; some updates have been made Source
SC-N-5	Construction Noise and Vibration (Annoyance) Noise sensitive land uses	If construction projects will occur on an existing school campus-	Prior to construction	LAUSD Facilities Division or its construction contractor shall consult and coordinate with the school principal or site administrator, and other nearby noise sensitive land uses prior to construction to schedule high noise or vibration producing activities to minimize disruption. Coordination between the school, nearby land uses and the construction contractor shall continue on an as-needed basis throughout the construction phase of the project to reduce school and other noise sensitive land use disruptions.	2004 New Construction Program EIR Mitigation Measures N-3.1 , adopted by the Board of Education on June 2004. N-3.1
SC-N-6	Vibration (Structural Damage)	If project requires rock blasting or demolition activities-	During construction	The LAUSD shall require the construction contractor to minimize blasting for all construction or and demolition activities, where feasible. If demolition is necessary adjacent to residential uses or fragile structures, the LAUSD shall require the construction contractor to avoid using impact tools. Alternatives that shall be considered include mechanical methods using hydraulic crushers or deconstruction techniques.	2004 New Construction Program EIR Mitigation Measures N-5.1 , adopted by the Board of Education on June 2004. N-5.1
SC-N-7	Vibration (Structural Damage)	If project requires pile driving or heavy vibration activities-	During construction	For projects where pile driving activities are required within 150 feet of a structure, a detailed vibration assessment shall be provided by an acoustical engineer to analyze potential impacts related to vibration to nearby structures and to determine feasible mitigation measures to eliminate potential risk of architectural damage.	none NEW
SC-N-8	Vibration (Structural Damage)	Where vibration intensive activities are planned within 25 feet of a historic building or structure	Prior to and during demolition and construction	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. <ul style="list-style-type: none"> • Prior to construction activities, the construction contractor shall inspect and report on the current foundation and structural condition of the historic building. • The construction contractor shall implement alternative methods identified in the preconstruction meeting during demolition, excavation, and construction for work done within 25 feet of the historic building. • The construction contractor shall avoid use of vibratory rollers and packers adjacent to a historic building. • During demolition the construction contractor shall not phase any ground-impacting operations near a historic building to occur at the same time as any ground impacting operation associated with demolition and construction of a new building. • During demolition and construction, if any vibration levels cause cosmetic or structural damage to a historic building the District shall issue "stop-work" orders to the construction contractor immediately to prevent further damage. Work shall not restart until the building is stabilized and/or preventive measures to relieve further 	none

4. Program Description

Table 4-1 LAUSD Standard Conditions of Approval Standards

PDF Reference #	Topic	Trigger for Compliance	Implementation Phase	Standard Conditions of Approval Standard Conditions	Original Location of original text; some updates have been made Source
				damage to the building are implemented.	
N-9	Construction Noise	If project requires exterior construction and/or heavy equipment	Prior to project construction	The LAUSD shall require its construction contractor to provide advance notice of the start of construction to all noise sensitive receptors, businesses, and residences adjacent to the project area. The announcement shall state specifically where and when construction activities will occur, and provide contact information for filing noise complaints with the contractor and the District. In the event of noise complaints the LAUSD shall monitor noise from the construction activity to ensure that construction noise does not exceed limits specified in the noise ordinance.	LAUSD Best Management Practices, adopted by the Board of Education on June 2004 as part of the 2004 program EIR.
N-10	Construction Noise	If construction project requires the use of portable equipment and/or outside storage and/or maintenance of equipment	During construction	The construction contractor shall locate portable equipment and store and maintain equipment as far as possible from the adjacent residents and other sensitive receptors.	LAUSD Best Management Practices, adopted by the Board of Education on June 2004 as part of the 2004 program EIR.
N-11	Construction Noise	If project requires exterior construction and/or heavy equipment	During construction	The construction contractor shall comply with applicable noise ordinances of the affected city or county jurisdiction.	LAUSD Best Management Practices, adopted by the Board of Education on June 2004 as part of the 2004 program EIR.
SC-N-129	Construction Noise	Exterior construction <u>and the use of large, heavy or noisy construction equipment</u> If project requires exterior construction	During construction	LAUSD shall prepare a noise assessment. <u>If site-specific review of a school construction project identifies potentially significant adverse construction noise impacts, then LAUSD shall implement all feasible measures to reduce below applicable noise ordinances. Exterior construction noise levels exceed local noise standards, policies, or ordinances at noise-sensitive receptors. LAUSD shall mandate that construction bid contracts include the measures identified in the noise assessment. Specific noise reduction measures include, but are not limited to, the following</u> If project construction noise levels are expected to exceed noise thresholds of significance, the LAUSD shall require the construction contractor to implement all feasible noise attenuation measures that may be identified as part of the environmental review of each individual project. Feasible noise attenuation measures include, but are not limited to:	LAUSD Best Management Practices, adopted by the Board of Education on June 2004 as part of the 2004 program EIR Program EIR.

4. Program Description

Table 4-1 LAUSD Standard Conditions of Approval Standards

PDF Reference #	Topic	Trigger for Compliance	Implementation Phase	Standard Conditions of Approval Standard Conditions	Original Location of original text; some updates have been made Source
				<p>construction of a masonry wall or installation of sound blankets along the property line adjacent to residential uses.</p> <p><u>Source Controls</u></p> <ul style="list-style-type: none"> • Time Constraints – prohibiting work during sensitive nighttime hours • Scheduling – performing noisy work during less sensitive time periods (on operating campus: delay the loudest noise generation until class instruction at the nearest classrooms has ended; residential: only between 7:00 AM and 7:00 PM) • Equipment Restrictions – restricting the type of equipment used • Noise Restrictions – specifying stringent noise limits • Substitute Methods – using quieter methods and/or equipment • Exhaust Mufflers – ensuring equipment have quality mufflers installed • Lubrication & Maintenance – well maintained equipment is quieter • Reduced Power Operation – use only necessary size and power • Limit Equipment On-Site – only have necessary equipment on-site • Noise Compliance Monitoring – technician on site to ensure compliance • Quieter Backup Alarms – manually-adjustable or ambient sensitive types <p><u>Path Controls</u></p> <ul style="list-style-type: none"> • Noise Barriers – semi-permanent or portable wooden or concrete barriers • Noise Curtains – flexible intervening curtain systems hung from supports • Enclosures – encasing localized and stationary noise sources • Increased Distance – perform noisy activities farther away from receptors, including operation of portable equipment, storage and maintenance of equipment <p><u>Receptor Controls</u></p> <ul style="list-style-type: none"> • Window Treatments – reinforcing the building’s noise reduction ability • Community Participation – open dialog to involve affected residents • Noise Complaint Process – ability to log and respond to noise complaints. Advance notice of the start of construction shall be delivered to all noise sensitive receptors adjacent to the project area. The notice shall state specifically where and when construction activities will occur, and provide contact information for filing noise complaints with the contractor and the District. In the event of noise complaints the LAUSD shall monitor noise from the construction activity to ensure that construction noise does not exceed limits specified in the noise ordinance. • Temporary Relocation – in extreme otherwise unmitigatable cases. Temporarily move residents or students to facilities away from the construction activity. 	
N-13	Construction	If project requires	During construction	The LAUSD shall require its construction contractor to provide advance notice of the	LAUSD Best Management Practices,

4. Program Description

Table 4-1 LAUSD Standard Conditions of Approval Standards

PDF Reference #	Topic	Trigger for Compliance	Implementation Phase	Standard Conditions of Approval Standard Conditions	Original Location of original text; some updates have been made Source
	Noise	exterior construction		start of construction to all noise sensitive receptors, businesses, and residences adjacent to the project area. The announcement shall state specifically where and when construction activities will occur, and provide contact information for filing noise complaints with the contractor and the District. In the event of noise complaints the LAUSD shall monitor noise from the construction activity to ensure that construction noise does not exceed limits specified in the noise ordinance.	adopted by the Board of Education on June 2004 as part of the 2004 program EIR.
PEDESTRIAN SAFETY					
Standard Conditions					
SC-PED-00 Compliance 1	OEHS pedestrian safety analysis	If project increases student capacity by more than 25% or 10 classrooms-	During project design	Caltrans SRTS program. The LAUSD is a participant in the SRTS program administered by Caltrans and 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.	OEHS pedestrian safety evaluation
SC-PED-00 Compliance 2	Pedestrian safety analysis	Increase if project increases student capacity by more than 25% or 10 classrooms-	During project design	OEHS CEQA Specification Manual, Appendix C, Traffic and Pedestrian Safety Requirements for New Schools. 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. Appendix C states school traffic studies shall identify measures to ensure separation between pedestrians and vehicles along potential pedestrian routes, such as sidewalks, crosswalks, bike paths, crossing guards, pedestrian and traffic signals, stop signs, warning signs, and other pedestrian access measures.	LAUSD OEHS CEQA Specification Manual, December 2005, Revised June 2007. Appendix C, Traffic and Pedestrian Safety Requirements for New Schools. December 2005, Revised June 2007.
SC-PED-00 Compliance 3	Pedestrian safety analysis	Increase if project increases student capacity by more than 25% or 10 classrooms-	During project design	OEHS CEQA Specification Manual, Appendix D, Sidewalk Requirements for New Schools. LAUSD shall coordinate with the responsible traffic jurisdiction/agency to ensure these areas are improved prior to the opening of a school. Improvements shall include, but are not limited to: <ul style="list-style-type: none"> Clearly designate passenger loading areas with the use of signage, painted curbs, etc. Install new walkway and/or sidewalk segments where none exist. Any substandard walkway/sidewalk segments shall be improved to a minimum of eight feet wide. 	LAUSD OEHS CEQA Specification Manual, December 2005, Revised June 2007. Appendix D, Sidewalk Requirements for New Schools. December 2005, Revised June 2007.

4. Program Description

Table 4-1 LAUSD Standard Conditions of Approval Standards

PDF Reference #	Topic	Trigger for Compliance	Implementation Phase	Standard Conditions of Approval Standard Conditions	Original Location of original text; some updates have been made Source
				<ul style="list-style-type: none"> Provide other alternative measures that separate foot traffic from vehicular traffic, such as distinct travel pathways or barricades. 	
<u>SC-PED-00 Compliance4</u>	<u>Pedestrian safety-Safety analysisAnalysis</u>	<u>Increase student capacity by more than 25% or 10 classroomsIf project increases student capacity</u>	Prior to project approval	<p>School Traffic Safety Reference Guide REF- 4492.1. This Reference Guide replaces Reference Guide 4492.0, School Traffic Safety, September 30, 2008. Updated information is provided, including new guidance on passenger loading zones and the Safety Valet Program. 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.</p>	LAUSD Traffic Safety Reference Guide. REF-4492.1. July 23, 2012
<u>SC-PED-00 Compliance5</u>	<u>Safe access Access to schoolSchool</u>	<u>If project includes Construction of bus loading area, student drop-off/pick-up area and/or parking-</u>	During project design	<p>School Design Guide. The Guide states student drop-off and pick-up, bus loading areas, and parking areas shall be separated to allow students to enter and exit the school grounds safely.</p>	LAUSD School Design Guide. January 2014.
Project Design Features					
<u>SC-T-13</u>	<u>Analysis for trafficTraffic Analysis</u>	<u>Increase student capacity by more than 25% or 10 classroomsIf project increases student capacity, and/or generates-generate additional traffic or shifts traffic patterns-</u>	Prior to project approval	<p>Coordinate with the local City or County jurisdiction and agree on the following:</p> <ul style="list-style-type: none"> Compliance with the jurisdiction's design guidelines for access, parking, and circulation in the vicinity of the project. Scope of analysis and methodology for the traffic and pedestrian study, including trip generation rates, trip distribution, number and location of intersections to be studied, and traffic impact thresholds. Implementation of SRTS, traffic control and pedestrian safety devices. Fair share contribution and/or other mitigation measures for potential traffic impacts. Traffic and pedestrian safety impact studies shall address local traffic and congestion during morning arrival times, and before and after evening stadium events. Traffic study will use the latest version of Institute of Transportation Engineer's (ITE) Trip Generation manual to determine trip generation rates (parent vehicles, school buses, staff/faculty vehicles, and delivery vehicles) based on the size of the school facility and the specific school type (e.g., Magnet, Charter, etc.), unless otherwise required by local jurisdiction. <p>Loading zones will be analyzed to determine the adequacy as pick-up and dropoff points. Recommendations will be developed in consultation with the local jurisdiction for curb loading bays or curb parking restrictions to accommodate loading needs and will</p>	NEW none

4. Program Description

Table 4-1 LAUSD Standard Conditions of Approval Standards

PDF Reference #	Topic	Trigger for Compliance	Implementation Phase	Standard Conditions of Approval	Original Location of original text; some updates have been made Source
				control double parking and across-the-street loading.	
SC-T-24	Construction Traffic	If project requires construction equipment to use public roadways-	Prior to construction	LAUSD shall require its contractors to submit a construction worksite traffic control plan to the LADOT for review prior to construction. The plan will show the location of any haul routes, hours of operation, protective devices, warning signs, and access to abutting properties LAUSD shall encourage its contractor to limit construction-related trucks to off-peak commute periods. As required by Caltrans, applicable transportation related safety measures shall be implemented during construction.	none NEW
POPULATION & HOUSING					
SC-PH-1	Property Displacement	Residential or business property acquisition	Prior to construction	Relocation Assistance Advisory Program. LAUSD shall conform to all residential and business displacement guidelines presented in the LAUSD's Relocation Assistance Advisory Program which complies with all items identified in the California State Relocation Assistance and Real Property Acquisition Guidelines (California Code of Regulations Title 25, Division 1, Chapter 6).	LAUSD's Relocation Assistance Advisory Program
PUBLIC SERVICES POPULATION and HOUSING					
Standard Conditions					
SC-PS-1	Emergency Protection Services	New building, new school, change in campus traffic circulation	Prior to construction	LAUSD shall: 1) have local fire and police jurisdictions review all construction and site plans prior to the State Fire Marshall's final approval; and 2) provide a full site plan for the local review, including all buildings, both existing and proposed, fences, drive gates, retaining walls, and other construction affecting emergency vehicle access, with unobstructed fire lanes for access indicated.	LAUSD Best Management Practices, adopted by the Board of Education on June 2004 as part of the 2004 Program EIR.
SC-PS-2PH-00 compliance	Emergency Preparedness & Response Property displacement	Practice on a standard schedule during school operation & during emergencies or disaster situations if project requires residential or business property acquisition.	During school operation Prior to construction	LAUSD shall implement emergency preparedness and response procedures in all schools as required in LAUSD References, Bulletins, Safety Notes, and Emergency Preparedness Plans. Relocation Assistance Advisory Program LAUSD shall conform to all residential and business displacement guidelines presented in the LAUSD's Relocation Assistance Advisory Program which complies with all items identified in the California State Relocation Assistance and Real Property Acquisition Guidelines (California Code of Regulations Title 25, Division 1, Chapter 6).	<ul style="list-style-type: none"> • REF-5803.2 - Emergency Drills and Procedures, August 26, 2013 • SAF:30 - Emergency Response Protocol for LASUD Exiting Facilities, March 2, 2007 • Emergency Operations Plan, updated April 2010 • BUL-6084.0 - Use of School Facilities in an Emergency or Disaster Situation, June 11, 2013 • REF-5511.2 - Safe School Plans Update for 2013-2014, August 15, 2013 • BUL-5433.1 - District Emergency Response and Preparedness, March 8, 2013

4. Program Description

Table 4-1 LAUSD Standard Conditions of Approval Standards

PDF Reference #	Topic	Trigger for Compliance	Implementation Phase	Standard Conditions of Approval Standard Conditions	Original Location of original text; some updates have been made Source
					<ul style="list-style-type: none"> REF-5451.1 - School Site Emergency/Disaster Supplies, April 12, 2013 REF 5741.0 - Emergency Response – Communications and Response Actions, April 23, 2012 Other LAUSD Emergency Preparedness Plans include earthquakes, bio-terrorism, heavy rain and flooding, disturbances/demonstrations, school safety, West Nile virus precautions, procedures for reentry and cleanup of fire damaged building, disposal procedures for hazardous waste and universal waste, LAUSD's Relocation Assistance Advisory Program
TRANSPORTATION & TRAFFIC					
Standard Conditions					
SC-T-00 Compliance 1	Traffic Analysis for traffic	Increase student capacity by more than 25% or 10 classrooms If project includes increase in student capacity and additional traffic.	Prior to project approval	OEHS CEQA Specification Manual--Appendix C, Traffic and Pedestrian Safety Requirements for New Schools. Requirements identifies performance requirements for the selection and design of school sites to minimize potential pedestrian safety risks: <ul style="list-style-type: none"> Site Selection Bus and Passenger Loading Areas Vehicle Access Pedestrian Routes to School Requirements also state school traffic studies shall identify measures to ensure separation between pedestrians and vehicles along potential pedestrian routes, such as sidewalks, crosswalks, bike paths, crossing guards, pedestrian and traffic signals, stop signs, warning signs, and other pedestrian access measures.	LAUSD OEHS CEQA Specification Manual-- December 2005, Revised June 2007--Appendix C, Traffic and Pedestrian Safety Requirements for New Schools. December 2005, Revised June 2007.
SC-T-00 Compliance 2	Vehicular access Access and parking	If project includes construction of parking, and/or vehicular or pedestrian access.	During project design	School Design Guide. Vehicular access and parking shall comply with Section 2.3, Vehicular Access and Parking of the School Design Guide, January 2014. The Design Guide contains the following regulations related to traffic: <ul style="list-style-type: none"> Parking Space Requirements 	School Design Guide. Los Angeles Unified School District. January 2014.

4. Program Description

Table 4-1 LAUSD Standard Conditions of Approval Standards

PDF Reference #	Topic	Trigger for Compliance	Implementation Phase	Standard Conditions of Approval Standard Conditions	Original Location of original text; some updates have been made Source
				<ul style="list-style-type: none"> • General Parking Guidelines • Vehicular Access and Pedestrian Safety • Parking Structure Security 	
Project Design Features					
<u>SC-T-43</u>	Traffic Analysis for traffic	Increase student capacity by more than 25% or 10 classrooms If project increases student capacity and/or generates additional traffic or shifts traffic patterns-	Prior to project approval	Coordinate with the local City or County jurisdiction and agree on the following: <ul style="list-style-type: none"> • Compliance with the jurisdiction's design guidelines for access, parking, and circulation in the vicinity of the project. • Scope of analysis and methodology for the traffic and pedestrian study, including trip generation rates, trip distribution, number and location of intersections to be studied, and traffic impact thresholds. • Implementation of SR2S, traffic control and pedestrian safety devices. • Fair share contribution and/or other mitigation measures for potential traffic impacts. • Traffic and pedestrian safety impact studies shall address local traffic and congestion during morning arrival times, and before and after evening stadium events. • Traffic study will use the latest version of Institute of Transportation Engineer's (ITE) Trip Generation manual to determine trip generation rates (parent vehicles, school buses, staff/faculty vehicles, and delivery vehicles) based on the size of the school facility, unless otherwise required by local jurisdiction. • Loading zones will be analyzed to determine the adequacy as pick-up and drop-off points. Recommendations will be developed in consultation with the local jurisdiction for curb loading bays or curb parking restrictions to accommodate loading needs and will control double parking and across-the-street loading. 	none NEW
<u>SC-T-24</u>	Construction Traffic	Large if project requires construction equipment to use public roadways-	Prior to construction	LAUSD shall require its contractors to submit a construction worksite traffic control plan to the local City or County jurisdiction LADOT for review prior to construction. The plan shall show the location of any haul routes, hours of operation, protective devices, warning signs, and access to abutting properties. LAUSD shall encourage its contractor to limit construction-related trucks to off-peak commute periods. As required by Caltrans, applicable transportation related safety measures shall be implemented during construction.	none NEW
<u>SC-AQ-65</u>	Traffic Reduction	Increase student capacity by more than 25% or 10 classrooms If project includes increase in student capacity and	During school operation	LAUSD shall encourage ride-sharing programs for students and teachers.	LAUSD Best Management Practices, adopted by the Board of Education on June 2004 as part of the 2004 program EIR Program EIR.

4. Program Description

Table 4-1 LAUSD Standard Conditions of Approval Standards

PDF Reference #	Topic	Trigger for Compliance	Implementation Phase	Standard Conditions of Approval/Standard Conditions	Original Location of original text; some updates have been made Source
UTILITIES and SERVICE SYSTEMS					
Standard Conditions					
USS-0 Compliance	Construction waste management	When projects will generate construction and demolition debris	Prior to start of and during construction	<p>School Design Guide & Specification 01340, Construction & Demolition Waste Management Construction and demolition waste shall be recycled to the maximum extent feasible. LAUSD has established a minimum non-hazardous construction and demolition debris recycling requirement of 75% by weight as defined in Specification 01340, Construction & Demolition Waste Management. (School Design Guide, January 2014)</p> <p>Specification 01340, Construction & Demolition Waste Management includes procedures for preparation and implementation, including reporting and documentation, of a Waste Management Plan for reusing, recycling, salvage or disposal of non-hazardous waste materials generated during demolition and/or new construction (Construction & Demolition (C&D) Waste), to foster material recovery and re-use and to minimize disposal in landfills. Requires the collection and separation of all C&D waste materials generated on-site, reuse or recycling on-site, transportation to approved recyclers or reuse organizations, or transportation to legally designated landfills, for the purpose of recycling salvaging and/or reusing a minimum of 75% of the C&D waste generated. (Specification 01340, Construction & Demolition Waste Management, July 7, 2003)</p>	<ul style="list-style-type: none"> • School Design Guide, January 2014; • Specification 01340, Construction & Demolition Waste Management, July 7, 2003; • LAUSD Best Management Practices, adopted by the Board of Education on June 2004 as part of the 2004 program EIR; • The Collaborative for High Performance Schools, High Performance Schools Best Practices Manual, Volume III—Criteria, Version 1.0, November 1, 2001. Adopted by the Board of Education on October 28, 2003. Updated 2009 CHPS Scorecard with 2011 Amendments. Prerequisite: ME2.0C.P1 and LAUSD 2014 School Design Guide.
Project Design Features					
PS-1	Fire protection services	If project involves construction and site plans.	Prior to construction	LAUSD shall: 1) have local fire jurisdictions review and approve all construction and site plans prior to the State Fire Marshall's final approval; and 2) provide a full site plan for the local review, including all buildings, both existing and proposed, fences, drive gates, retaining walls, and other construction affecting Fire Department access, with unobstructed fire lanes for access indicated. Fire watch may be required during modification/replacement of existing systems.	LAUSD Best Management Practices, adopted by the Board of Education on June 2004 as part of the 2004 program EIR.
SC-USS-1	Solid Waste (construction)	Generate construction and/or demolition debris	Prior to start and during construction	<p>School Design Guide. Construction and demolition waste shall be recycled to the maximum extent feasible. LAUSD has established a minimum non-hazardous construction and demolition debris recycling requirement of 75% by weight as defined in Specification 01340, Construction & Demolition Waste Management.</p> <p>Guide Specifications 2004 - Section 01340, Construction & Demolition Waste</p>	<ul style="list-style-type: none"> • School Design Guide, January 2014; • Specification 01340, Construction & Demolition Waste Management, July 7, 2003; • LAUSD Best Management Practices, adopted by the Board of Education

4. Program Description

Table 4-1 LAUSD Standard Conditions of Approval Standards

PDF Reference #	Topic	Trigger for Compliance	Implementation Phase	Standard Conditions of Approval Standard Conditions	Original Location of original text; some updates have been made Source
				<p><u>Management.</u> This section of the LAUSD Specifications includes procedures for preparation and implementation, including reporting and documentation, of a Waste Management Plan for reusing, recycling, salvage or disposal of non-hazardous waste materials generated during demolition and/or new construction (Construction & Demolition (C&D) Waste), to foster material recovery and re-use and to minimize disposal in landfills. Requires the collection and separation of all C&D waste materials generated on-site, reuse or recycling on-site, transportation to approved recyclers or reuse organizations, or transportation to legally designated landfills, for the purpose of recycling salvaging and/or reusing a minimum of 75% of the C&D waste generated.</p>	<p>on June 2004 as part of the 2004 Program EIR;</p> <ul style="list-style-type: none"> The Collaborative for High Performance Schools. High Performance Schools Best Practices Manual, Volume III-- Criteria. Version 1.0, November 1, 2001. Adopted by the Board of Education on October 28, 2003. Updated 2009 CHPS Scorecard with 2011 Amendments. Prerequisite. Construction Waste Management. ME2.0C.P1 and LAUSD 2014 School Design Guide.
SC-USS-12	Water Supply	If project involves excavation near water lines	During construction	LAUSD shall coordinate with the City of Los Angeles Department of Water and Power or other appropriate jurisdiction and department prior to the relocation or upgrade of any water facilities to reduce the potential for disruptions in service.	LAUSD Best Management Practices, adopted by the Board of Education on June 2004 as part of the 2004 program EIR Program EIR.
USS-2	Solid Waste	If new school is constructed on existing campus	Prior to occupation	The building/school shall meet local ordinance requirements for recycling space. Areas without local ordinances should use the model ordinance developed by the California Integrated Waste Management Board	The Collaborative for High Performance Schools. High Performance Schools Best Practices Manual, Volume III-- Criteria. Version 1.0, November 1, 2001. Adopted by the Board of Education on October 28, 2003. Updated 2009 CHPS Scorecard with 2011 Amendments. Prerequisite. Storage and Collection of Recyclables ME1.0.P1
SC-USS-33	Solid Waste (operation)	New school or new school construction on existing campus If new school is constructed on existing campus	During operation	Provide easily accessible area serving the entire school that are dedicated to the collection and storage of materials for recycling including (at a minimum) paper, cardboard, glass, plastics, metals and landscaping waste. There shall be at least one centralized collection point (loading dock), and ability for separation of recyclables where waste is disposed of for classrooms and common areas such as cafeteria's, gyms or multi-purpose rooms.	The Collaborative for High Performance Schools. High Performance Schools Best Practices Manual, Volume III-- Criteria. Version 1.0, November 1, 2001. Adopted by the Board of Education on October 28, 2003. Updated 2009 CHPS Scorecard with 2011 Amendments. Prerequisite. Storage and Collection of Recyclables. ME1.0.P2
SC-GHG-1	Water use and	If project include work on water pumps,	During school operation	During school operation, LAUSD shall perform regular preventative maintenance on pumps, valves, piping, and tanks to minimize water loss.	LAUSD Best Management Practices, adopted by the Board of Education on

4. Program Description

Table 4-1 LAUSD Standard Conditions of Approval Standards

PDF Reference #	Topic	Trigger for Compliance	Implementation Phase	Standard Conditions of Approval Standard Conditions	Original Location of original text; some updates have been made Source
	efficiency Efficiency	valves, piping, and/or tanks-			June 2004 as part of the 2004 program EIRProgram EIR
SC-GHG-2	Water use Use and efficiency Efficiency	If projects involve Work on landscape irrigation system-	Prior to full operation of irrigation system	LAUSD shall utilize set automatic sprinklers set to irrigate landscaping during the early morning (overhead and drip) and evening (drip only) hours to reduce water loss from evaporation.	LAUSD Best Management Practices, adopted by the Board of Education on June 2004 as part of the 2004 program EIRProgram EIR
SC-GHG-3	Water use Use and efficiency Efficiency	If projects involve Work on landscape irrigation system-	Prior to full operation of irrigation system	LAUSD shall reset automatic sprinkler timers to water less during cooler months and during the rainy season.	LAUSD Best Management Practices, adopted by the Board of Education on June 2004 as part of the 2004 program EIRProgram EIR
SC-GHG-4	Water use Use and efficiency Efficiency	If projects involve Work on landscape and/or irrigation system.	Prior to full operation of irrigation system	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.	The Collaborative for High Performance Schools. High Performance Schools Best Practices Manual, Volume III--Criteria. Version 1.0, November 1, 2001. Adopted by the Board of Education on October 28, 2003. Updated 2009 CHPS Scorecard with 2011 Amendments. Prerequisite. Construction Waste Management. WE1.0C.P1 and LAUSD 2014 School Design Guide.
SC-GHG-5	Energy efficiency Efficiency	If project involves a Building construction	Prior to occupancy	LAUSD shall ensure that the time dependent valued energy of the proposed project design is at least 10 percent, with a goal of 20 percent less than a standard design that is in minimum compliance with the California Title 24, Part 6 energy efficiency standards that are in force at the time the project is submitted to the Division of the State Architect.	<u>The Collaborative for High Performance Schools. High Performance Schools Best Practices Manual, Volume III--Criteria. Version 1.0, November 1, 2001. Adopted by the Board of Education on October 28, 2003. Updated 2009 CHPS Scorecard with 2011 Amendments. Prerequisite. Energy Efficiency. EE1.0C.P1 and LAUSD 2014 School Design Guide. GHG-7</u>

4. Program Description

4.7 ZONING OVERRIDE

As part of the SUP, the District plans to exempt all existing schools from local jurisdiction zoning regulations. Although most school property is owned by the District, the underlying city or county zoning can be residential, industrial, or commercial. The California legislature granted school districts the power to exempt school property from county and city zoning requirements, provided the school district complies with the terms of Government Code Section 53094.⁵⁴ As lead agency, the District will comply with the criteria for implementation of the land use overrides to render the county and city zoning ordinance inapplicable to existing school properties. All existing schools not already exempt from local zoning would become exempt following a two-thirds vote of the Board. Within 10 days of this action, the Board will provide the county and cities with notice of this action.

4.8 CEQA COMPLIANCE

OEHS has specific guidelines in place to determine CEQA requirements for ~~a specific site-specific projects that involve new school construction, or modernization, repair, and upgrades projects~~. This ensures that the appropriate environmental analysis is performed for each site-specific project. ~~It also allows for the identification of projects that are eligible for CEQA categorical or statutory exemption, thereby eliminating the need for DTSC involvement per Education Code Section 17268(e). CEQA categorical exemptions for which school projects commonly qualify are 1) Class 1, modifications to existing facilities, 2) Class 2, replacement or reconstruction of existing structures and facilities, 3) Class 3, construction of small structures or facilities, 4) Class 4, minor alterations to land, 5) Class 14, minor additions to schools, and 6) Class 32, in-fill development projects on parcels of less than 5 acres.~~

~~OEHS has identified numerous routine activities at existing facilities that can be conducted without a CEQA determination, including many installation, maintenance, repair, and replacement projects likely to be conducted under the School Upgrade Project.⁵⁵ According to OEHS, these CEQA exempt activities will not result in an expansion of use of a facility that is “more than negligible.” Current guidance requires OEHS to review projects that involve historical resources, sensitive biological resources, adjacent noise-sensitive uses, listed hazardous waste sites, and significant interior modernization affecting 20 percent or more of the total building space for CEQA requirements, as well as any project that will receive state funding. Applicable LAUSD guidance for CEQA procedures includes:~~

⁵⁴ Government Code Section 53094.

(a) Notwithstanding any other provision of this article, this article does not require a school district to comply with the zoning ordinances of a county or city unless the zoning ordinance makes provision for the location of public schools and unless the city or county has adopted a general plan.

(b) Notwithstanding subdivision (a), the governing board of a school district, that has complied with the requirements of Section 65352.2 of this code and Section 21151.2 of the Public Resources Code, by a vote of two-thirds of its members, may render a city or county zoning ordinance inapplicable to a proposed use of property by the school district. The governing board of the school district may not take this action when the proposed use of the property by the school district is for nonclassroom facilities, including, but not limited to, warehouses, administrative buildings, and automotive storage and repair buildings.

(c) The governing board of the school district shall, within 10 days, notify the city or county concerned of any action taken pursuant to subdivision (b).

⁵⁵ LAUSD Office of Environmental Health and Safety. Memorandum: Activities Not Requiring OEHS Review, July 27, 2006.

4. Program Description

- Board of Education Report No. 129-02/03, LAUSD Procedures for Implementing the California Environmental Quality Act, Board of Education Report No. 129-02/03, April 8, 2003
- LAUSD New School Construction Program, Program Environmental Impact Report Exemptions, Chattel, September 2005
- LAUSD Facilities Services Division, *Central Design Management – CEQA Procedures*, May 8, 2006 (preliminary draft)
- LAUSD-OEHS Memorandum: *Activities Not Requiring OEHS Review*, July 27, 2006
- LAUSD-OEHS California Environmental Quality Act Specification Manual, December 2005, Revised June 2007
- LAUSD-OEHS *Review of Proposed School Projects*, December 1, 2009
- LAUSD-OEHS Reference Guide REF-5314.1: Procedures for Environmental Review of Proposed Projects, REF-5314.1, March 7, 2012
- Further environmental analysis guidance for future SUP-related projects can be found in Appendix D (CEQA Process Analysis) and Appendix E (Infill Streamlining), Appendix EB-3 (Historic Resource Exemptions 2005) of this EIR.

OEHS review of proposed school sites or improvements to existing District facilities is required to ensure the health and safety of students and staff. OEHS review is required for the following types of projects regardless of funding source:⁵⁶

- Proposed new school site
- Expansion, major repair, or modernization of existing school facilities
- Proposed placement of bungalows or other temporary structures at existing schools
- Change in or occupancy of existing facilities
- Proposed lease or use of non-District property for District purposes
- Other CEQA projects as listed in Table 4-2 below

The types of projects anticipated to be undertaken as part of the SUP along with anticipated CEQA compliance are shown in Table 4-2.

⁵⁶ LAUSD Reference Guide No. REF-5314.1. *Procedures for Environmental Review of Proposed Projects*. March 7, 2012.

4. Program Description

Table 4-2 SUP Components and Environmental Compliance for SUP-Related Projects

Program Component/Projects-Category	Anticipated CEQA Compliance			Possible CEQA Exemption Class
	Qualifies as a Project Under CEQA "Project"?	Statutory Exemption?	Categorical Exemption?	
Type 1. New Construction on New Property				
Adjacent property acquisition for existing campus expansion. These projects may include, but are not limited to, new building construction for classrooms (to replace portables), library/media center, performing arts, gymnasium, administration offices and other construction such as a stadium, athletic fields, restrooms, drop-off zones, parking and driveways.	Yes	No	Maybe	<ul style="list-style-type: none"> • Class 3: New Construction or Conversion of Small Structures (14 CCR § 15303) • Class 4: Minor Alterations to Land (14 CCR § 15304) • Class 11: Accessory Structures (14 CCR § 15311) • Class 14: Minor Additions to Schools (14 CCR § 15314) • Class 32: Infill Development Projects (14 CCR § 15332)
Type 2. New Construction on Existing Campus				
New classroom building; net increase in student capacity greater than 25%, or 10 classrooms whichever is greater.	Yes	No	No	–
New classroom building; net increase in student capacity less than 25% or 10 classrooms whichever is greater.	Yes	No	Maybe	<ul style="list-style-type: none"> • Class 1: Existing Facilities (14 CCR § 15301) • Class 2: Replacement or Reconstruction (14 CCR § 15302) • Class 3: New Construction or Conversion of Small Structures (14 CCR § 15303) • Class 4: Minor Alterations to Land (14 CCR § 15304) • Class 11: Accessory Structures (14 CCR § 15311) • Class 14: Minor Additions to Schools (14 CCR § 15314) • Class 32: Infill Development Projects (14 CCR § 15332)
New building including, but not limited to, library/media center, performing arts, auditorium, gymnasium, and other construction such as athletic venue lights (for field or outdoor pool), stadiums, outdoor pools, athletic fields.	Yes	No	Maybe	<ul style="list-style-type: none"> • Class 14: Minor Additions to Schools (14 CCR § 15314)

4. Program Description

Table 4-2 SUP Components and Environmental Compliance for SUP-Related Projects

Program Component/Projects Category	Anticipated CEQA Compliance			Possible CEQA Exemption Class
	Qualifies as a Project Under CEQA "Project"?	Statutory Exemption?	Categorical Exemption?	
Demolition and new building construction on existing campus (replace school building on same location).	Yes	No	Maybe	<ul style="list-style-type: none"> Class 2: Replacement or Reconstruction (14 CCR § 15302)
Installation of temporary structures	Yes	No	Maybe	<ul style="list-style-type: none"> Class 14: Minor Additions to Schools (14 CCR § 15314)
Construction of new health clinic, Parent and Family Center, other community uses, including joint use on existing campus	Yes	No	Maybe	<ul style="list-style-type: none"> Class 1: Existing Facilities (14 CCR § 15301) Class 2: Replacement or Reconstruction (14 CCR § 15302) Class 3: New Construction or Conversion of Small Structures (14 CCR § 15303) Class 4: Minor Alterations to Land (14 CCR § 15304) Class 11: Accessory Structures (14 CCR § 15311) Class 14: Minor Additions to Schools (14 CCR § 15314) Class 32: Infill Development Projects (14 CCR § 15332)
Construction of restrooms, drop-off zones, new parking lots, new driveways.	Yes	No	Maybe	
Type 3. Modernization, Repair, Replacement, Upgrade, Remodel, Renovation and Installation				
Installation of modular units, portable classrooms, or bungalows; net increase in student capacity is greater than 25% , or 10 classrooms whichever is greater.	Yes	No	No	–
Installation of modular units, portable classrooms, or bungalows; net increase in student capacity less than 25% or 10 classrooms whichever is greater.	Yes	No	Yes	<ul style="list-style-type: none"> Class 14: Minor Additions to Schools (14 CCR § 15314)
Improvements to existing health clinic, Parent and Family Center, or other community uses on existing campus	Yes	No	Maybe	<ul style="list-style-type: none"> Class 1: Existing Facilities (14 CCR § 15301) Class 2: Replacement or Reconstruction (14 CCR § 15302)
Demolition & removal of permanent buildings or structures.	Yes	No	Maybe	
Installation at existing schools such as play equipment, fencing, ADA compliance.	No	–	–	–

4. Program Description

Table 4-2 SUP Components and Environmental Compliance for SUP-Related Projects

Program Component/Projects-Category	Anticipated CEQA Compliance			Possible CEQA Exemption Class
	Qualifies as a Project Under CEQA "Project"?	Statutory Exemption?	Categorical Exemption?	
Outdoor repair, modernization, replacement or upgrade of athletic fields [natural grass to synthetic turf], play equipment, fencing, parking, replace shade shelter, asphalt/concrete paths, driveways, ADA compliance, seismic retrofits.	Yes	No	Maybe	
Sustainability energy conservation installations such as new photovoltaic panels on rooftops & parking lot shade structures or wind arrays.	Yes	Yes	Yes	<ul style="list-style-type: none"> Solar arrays placed in parking lots, and on rooftops are statutorily exempt under SB226⁵⁷ (PRC§21080.35)⁵⁸ ⁵⁹ Class 3: New Construction or Conversion of Small Structures (14 CCR § 15303) Class 14: Minor Additions to Schools (14 CCR § 15314)
Repair and replacement of building systems such as flooring, windows, and roofing or historic resources where activities are not listed on exemptions described in Chattel Architecture document, September 2005 – see Appendix EB-3 of this EIR.	Not Historic: No Historic: Yes	- No	- Yes	- Class 31: Historical Resource Restoration/Rehabilitation (14 CCR § 15331)
New or replacement of furniture or other interior equipment.	No	-	-	-
Replace existing diesel buses with higher efficiency buses.	No	-	-	-
Sustainability energy conservation changes such as replacement, upgrade, or retrofit of inefficient lighting, electrical transformers, building insulation, installation of irrigation smart controllers.	No	-	-	-
Structural upgrades of modular units or portable classrooms, relocation of portables on campus.	No	-	-	-

⁵⁷ PRC Section 21080.35(a) Except as provided in subdivision (d), this division does not apply to the installation of a solar energy system on the roof of an existing building or at an existing parking lot. SB226 creates a ~~Under this section~~ statutory exemption from CEQA for rooftop and parking lot solar installations under 500 square feet. However, since these structures are arguably already categorically exempt under CEQA (as either additions to existing structures (Class 14), construction of small structures, or accessory structures (Class 11), depending on the nature of the installation), this is likely to benefit only a small set of projects relative to existing law.

⁵⁸ PRC Section 21080.35(a) Under this section rooftop and parking lot solar installations under 500 square feet are statutorily exempt under CEQA. However, since these structures are arguably already categorically exempt under CEQA as either additions to existing structures (Class 14), construction of small structures, or accessory structures (Class 11), depending on the nature of the installation, this is likely to benefit only a small set of projects.

⁵⁹ PRC Section 21080.35, as added by SB 226, was mislabeled and codified under the same number as an existing code section with unrelated content. AB 226 does not amend the existing language of Section 21080.35.

4. Program Description

Table 4-2 SUP Components and Environmental Compliance for SUP-Related Projects

Program Component/Projects-Category	Anticipated CEQA Compliance			Possible CEQA Exemption Class
	Qualifies as a Project Under CEQA "Project"?	Statutory Exemption?	Categorical Exemption?	
Exterior cosmetic improvements such as Facelift Program, painting, site cleanup.	No	-	-	
Interior remodeling and renovations, painting, installation, repair, and upgrades to fire/life-safety/security /emergency systems, ADA, plumbing, lighting, electrical, HVAC, computer systems, low flow restroom fixtures, food service equipment.	No	-	-	-
Replacement of lead water pipes.	No	-	-	-
Abatement of lead based paint and asbestos in buildings.	No	=	=	=
Interior routine activities that involve installation, repair, replacement and maintenance¹				
Carpentry <ul style="list-style-type: none"> • Wood trim, metal or plastic trim • Wood and metal door systems • Windows, including: sash, transforms, wooden window frames, blinds • Wood framing and paneling • Cabinets and bookshelves • Wood ramps • Restroom partitions and hardware • Room partition walls and doors • Flooring, including ceramic tiles, linoleum, carpet, hardwood floors (Historic Resources:² repair of floors, floor refinishing) • Interior plaster (Historic Resources:² repair of interior walls) • Drywall (Historic Resources:² repair of interior walls) • Historic Resources:² removal of loose and flaking paint • Historic Resources:² repair of interior stairs • Historic Resources:² repair or replacement of interior suspended ceiling tiles • Historic Resources:² repair of interior doors, frames and thresholds • Structural upgrades of modular units or portable classrooms, relocation of portables on campus³ 	No	=	=	=
Electrical <ul style="list-style-type: none"> • Electrical conveyances • Debit Card Systems • Fuses • Wiring • Light ballasts 	No	=	=	=

4. Program Description

Table 4-2 SUP Components and Environmental Compliance for SUP-Related Projects

<u>Program Component/Projects-Category</u>	Anticipated CEQA Compliance			Possible CEQA Exemption Class
	<u>Qualifies as a Project Under CEQA "Project"?</u>	<u>Statutory Exemption?</u>	<u>Categorical Exemption?</u>	
<ul style="list-style-type: none"> • <u>Electrical short circuits</u> • <u>Exposed wires</u> • <u>Broken or loose conduits</u> • <u>Lenses on lights</u> • <u>Clocks</u> • <u>Battery backup systems</u> • <u>Electrical panels</u> • <u>Old lighting/lamp fixtures, emergency egress lighting</u> • <u>Permanent and Temporary emergency lighting</u> • <u>Bells Systems</u> • <u>Emergency egress lighting</u> • <u>Circuit breakers</u> • <u>Key switch</u> • <u>Timed switches</u> • <u>Light switches</u> • <u>Stage dimmer boards</u> • <u>Chandeliers</u> • <u>Stage lighting</u> • <u>Inefficient lighting?</u> • <u>Fire alarm systems (Historic Resources:² replace or install fire or smoke detectors)</u> • <u>Remote power supplies</u> • <u>Historic Resources:² upgrade or replace wiring and utilitarian components</u> 				
<u>Heating, Ventilating and Air Conditioning (HVAC)</u> <ul style="list-style-type: none"> • <u>Steam boilers</u> • <u>Hot water heating boilers</u> • <u>Wall heaters</u> • <u>Heating furnace</u> • <u>Split air conditioning system</u> • <u>Window A/C</u> • <u>HVAC systems</u> • <u>Gas heating, electrical cooling rooftop unit (3 to 10 tons)</u> • <u>Chiller</u> • <u>Chilled and hot water heating lines</u> • <u>Multi-zone A/C unit (15 to 60 tons)</u> • <u>Gas heating or hot water heating</u> • <u>Pneumatic controls (HVAC System)</u> • <u>Electronic/electric controls (HVAC Systems)</u> • <u>Energy Management Control Systems (HVAC)</u> • <u>Shell and Tube condensers</u> 	No	=	=	=

4. Program Description

Table 4-2 SUP Components and Environmental Compliance for SUP-Related Projects

<u>Program Component/Projects-Category</u>	Anticipated CEQA Compliance			Possible CEQA Exemption Class
	Qualifies as a Project Under CEQA "Project"?	Statutory Exemption?	Categorical Exemption?	
<ul style="list-style-type: none"> • <u>Steam convectors</u> • <u>Plate heat exchangers</u> • <u>Heat Pumps A/C units</u> • <u>Wall mount A/C units</u> • <u>Air and water balance A/C units</u> • <u>Steam coils and traps</u> • <u>Chilled and hot water coils</u> • <u>Boiler fuel trains</u> • <u>Boiler controls</u> • <u>Steam radiators and convectors</u> 				
<p><u>Plumbing</u></p> <ul style="list-style-type: none"> • <u>Bathroom fixtures (toilets, urinals, lavatories/sinks, and floor drains)</u> • <u>Hose bibs</u> • <u>Sumps and pumps</u> • <u>Shut off valves</u> • <u>Gas pressure regulators</u> • <u>Water pressure regulators</u> • <u>Eye washers</u> • <u>Storm drain and clarifiers</u> • <u>Hydraulic hoists</u> • <u>Hazardous waste drains and clarifiers</u> • <u>Showers</u> • <u>Sinks, faucets, drinking fountains</u> • <u>Replacement of lead water pipes³</u> • <u>Piping (Historic Resources:² upgrade or in kind replacement of pipes and other utilitarian components)</u> • <u>Earthquake valves</u> • <u>Seismic strapping</u> 	No	=	=	=
<p><u>Miscellaneous</u></p> <ul style="list-style-type: none"> • <u>Auto shop hydraulic hoists</u> • <u>Surface sump pumps</u> • <u>Compressors for shop classes</u> • <u>Dust collection equipment in shop classes</u> • <u>Dust collection systems</u> • <u>Exhaust systems and hoods</u> • <u>A/C ducting systems</u> • <u>Ventilation louvers</u> • <u>Gravity vents</u> • <u>Lockers</u> • <u>A/C curb covers</u> • <u>Bathroom mirror frames</u> • <u>Hardware cloth for pest control</u> 	No	=	=	=

4. Program Description

Table 4-2 SUP Components and Environmental Compliance for SUP-Related Projects

Program Component/Projects-Category	Anticipated CEQA Compliance			Possible CEQA Exemption Class
	Qualifies as a Project Under CEQA "Project"?	Statutory Exemption?	Categorical Exemption?	
<ul style="list-style-type: none"> • <u>Metal shelving</u> • <u>ADA compliance³</u> • <u>Abatement of lead based paint and asbestos in buildings³</u> • <u>Historic Resources:² replacement of damaged security devices or installation of new security.</u> • <u>Repair or replace free-standing furniture and equipment³ (includes Historic Resources²)</u> • <u>Historic Resources:² installation of grab bars and minor interior modification for ADA accessibility</u> • <u>Historic Resources:² replacement or installation of insulation</u> 				
<u>Exterior routine activities that involve installation, repair, replacement and maintenance¹</u>				
<u>Building Façade</u> <ul style="list-style-type: none"> • <u>Weather stripping on exterior doors</u> • <u>Wood yard boxes</u> • <u>Vandalized structures (repair or replacement)</u> • <u>Porch overhangs</u> • <u>Skirting on portable buildings</u> • <u>Window security grills</u> • <u>Emergency exit grills</u> • <u>Metal window frames</u> • <u>Coiling counter doors</u> • <u>Roof access hatches</u> • <u>Sliding glass doors</u> • <u>Skylights</u> • <u>Handicap ramps and stairs</u> • <u>Hand rails</u> • <u>Rain gutters and downspouts</u> • <u>Exterior stucco</u> • <u>Paint</u> • <u>Exterior cosmetic improvements such as Facelift Program, painting, site cleanup³</u> • <u>Historic Resources:² repair or partial replacement of porch components including cornices, exterior siding, doors, balustrades, stairs, or other trim</u> • <u>Historic Resources:² repair of exterior doors, frames and thresholds</u> • <u>Historic Resources:² caulking and weather-stripping, replacement of clear window panes, repair of window sash, frames and sills, repair of roofing, gutters and downspouts.</u> 	<u>No</u>	=	=	=

4. Program Description

Table 4-2 SUP Components and Environmental Compliance for SUP-Related Projects

<u>Program Component/Projects-Category</u>	Anticipated CEQA Compliance			Possible CEQA Exemption Class
	<u>Qualifies as a Project Under CEQA "Project"?</u>	<u>Statutory Exemption?</u>	<u>Categorical Exemption?</u>	
<ul style="list-style-type: none"> • <u>Historic Resources:² Exterior. install mechanical equipment within perimeter walls and beneath the roof.</u> 				
<p>Recreational Facilities (does not include Installation)</p> <ul style="list-style-type: none"> • <u>Athletic Field lighting</u> • <u>Tennis/basketball court lighting</u> • <u>Scoreboards</u> • <u>Kick boards along fences and backstops</u> • <u>Wood seating and foot rests on permanent interior or exterior bleachers</u> • <u>Swimming pool grout</u> • <u>Metal stadium bleachers (replacement must not exceed existing capacity)</u> • <u>Folding gymnasium bleachers</u> • <u>Football training equipment</u> • <u>Baseball back stops</u> • <u>Playground matting</u> • <u>Gymnasium basketball goals</u> • <u>Drain covers</u> 	No	=	=	=
<p>Landscaping</p> <ul style="list-style-type: none"> • <u>Irrigation systems including lawn sprinklers and sprinkler controls</u> • <u>Trees, shrubs and other vegetation</u> • <u>Historic Resources:² replacement in kind of landscaping plant material, Repair or replacement of utilitarian landscape components, such as sprinkler piping, repair of fencing and freestanding exterior walls, installation of temporary reversible barriers such as chain link fences and polyethylene sheeting or tarps, repair of roadways, driveways and walkways, Repair or replacement of running track surfaces within existing curbs.</u> 	No	=	=	=
<p>Paving (Repair or resurface existing paved areas)</p> <ul style="list-style-type: none"> • <u>Asphalt Parking lots</u> • <u>Walkways</u> • <u>Asphalt Playgrounds</u> • <u>Flag pole footing</u> • <u>Drainage facilities</u> 	No	=	=	=
<p>Miscellaneous</p> <ul style="list-style-type: none"> • <u>Chain link fences and gates, wrought iron fences and gates</u> • <u>Installation at existing schools such as play</u> 	No	=	=	=

4. Program Description

Table 4-2 SUP Components and Environmental Compliance for SUP-Related Projects

Program Component/Projects-Category	Anticipated CEQA Compliance			Possible CEQA Exemption Class
	Qualifies as a Project Under CEQA "Project"?	Statutory Exemption?	Categorical Exemption?	
<p>equipment, fencing, ADA compliance.³</p> <ul style="list-style-type: none"> • Building signs (Historic Resources:² repair or replacement of signs or awnings) • Historic Resources:² replacement of damaged security devices or installation of new security • Historic Resources:² Seismic Repair and Upgrade: anchoring of masonry walls to floor and roof systems, grout injection of unreinforced masonry walls, repair of parapets, chimneys and cornices, brick or masonry repainting, stabilization of structural foundations and addition of foundation bolts, temporary bracing or shoring as part of emergency stabilization, installation of seismic upgrades • Replace existing diesel buses with higher efficiency buses 				
Type 4. Operational and Other Campus Changes				
Removal of modular units, portable classrooms, bungalows or other temporary structures at existing school facilities	Yes	No	Maybe	• Class 1: Existing Facilities (14 CCR § 15301)
Change in student capacity (student classroom loading).	Yes	No	Yes	• Class 22: Educational or Training Programs Involving No Physical Changes (14 CCR § 15322)
Change in grade structure (e.g., change grades from elementary to middle school or other)	Yes	No	Maybe	• Class 22: Educational or Training Programs Involving No Physical Changes (14 CCR § 15322)
Change in use or occupancy of existing facilities (charter school, co-locations, joint use)	Yes	No	Maybe	• Class 22: Educational or Training Programs Involving No Physical Changes (14 CCR § 15322)
Co-location or land lease agreements for charter school facilities	Yes	No	Maybe	• Class 22: Educational or Training Programs Involving No Physical Changes (14 CCR § 15322)
Closure of existing school or transfer of students to another school	Yes	Yes	Yes	• Qualifies when closing of any kindergarten through 12th grade public school and/or the transfer of students from that public school to another school if the only physical changes involved are categorically exempt (PRC §21080.18)
Reopening closed schools	Yes	No	No	-

4. Program Description

Table 4-2 SUP Components and Environmental Compliance for SUP-Related Projects

Program Component/Projects Category	Anticipated CEQA Compliance			Possible CEQA Exemption Class
	Qualifies as a Project Under CEQA "Project"?	Statutory Exemption?	Categorical Exemption?	
Lease or use of non-District property for student classroom purposes	Yes	No	Maybe	<ul style="list-style-type: none"> Class 1: Existing Facilities (14 CCR § 15301)

¹ These activities do not require OEHS notification or review. However, FSD must notify OEHS and obtain an OEHS CEQA determination if 1) an activity will result in an expansion of use of a facility that is more than negligible, or 2) one or more exceptions apply. Source: LAUSD Internal Memorandum, RE: *Activities Not Requiring OEHS Review*, July 27, 2006. All activities under this heading are listed in the Internal Memorandum unless otherwise noted.

² These activities are not listed in LAUSD Internal Memorandum; however, they are listed *Chattel Architecture* exemption document, September 2005 (see Appendix EB-3 of this EIR). These repair, replacement, maintenance and other alteration activities on a campus with historic resources and/or directly to a historic building are not considered a "project" under CEQA and do not require OEHS notification or review or review by a qualified architectural historian only if strict compliance with procedures and documentation outlined in the *Chattel Architecture* exemption document, September 2005 (see Appendix EB-3 of this EIR).

³ These activities are not listed in LAUSD Internal Memorandum; however, they would not be a "project" under CEQA and would therefore, not require OEHS review.

4.8.1 Projects Found to Be Categorically Exempt⁶⁰

Pursuant to State CEQA Guidelines Sections 15022(a)(1)(C) and 15061(c) of the State CEQA Guidelines, LAUSD has adopted this section sets forth a list of specific types of projects often handled by the District that have been found to be categorically exempt from CEQA as listed below.⁶¹ in particular cases. Citations in parentheses are references to the State CEQA Guidelines. Under the State CEQA Guidelines, the District may only rely on Categorical Exemptions as long as none of the exceptions set forth in State CEQA Guidelines Section 15300.2 apply (see "Exceptions to Exemptions" following this section⁶²).

- **Class 1: (a) Existing Facilities** (Class 1; 14 CCR Section 15301/4 CCR Section 15304). There are District has performed a wide variety of operational, maintenance, repair and alteration activities at existing facilities that the District has found to be categorically exempt from CEQA, because the activities involved no or negligible expansion of use, for example:
 - The District has found to be exempt, for example, the following activities in specific circumstances:
 - restoration of damaged structures and equipment to meet current standards
 - small additions to existing structures
 - addition of new copy on existing on- and off-premise signs
 - maintenance of existing landscaping

⁶⁰ Los Angeles Unified School District Procedures for Implementing the California Environmental Quality Act, December 2002.

⁶¹ Los Angeles Unified School District Procedures for Implementing the California Environmental Quality Act, December 2002.

⁶² "Activities" that do not require OEHS review do not meet the definition of a "project" under CEQA.

4. Program Description

- ~~and demolition of small structures such as including accessory structures like such as fences.~~
 - ~~**Class 2: (b) Replacement or Reconstruction** (Class 2: 14 CCR Section 15302). The District has replaced and reconstructed existing structures and facilities where a new structure was located on the same site as a replaced structure, and the new structure had substantially the same purpose and capacity as the replace structure. Under this category, for example: ~~The District has applied this exemption, for example:~~~~
 - ~~to the replacement of a portable classroom with another portable classroom of substantially the same purpose and capacity:~~
 - ~~**Class 3: (e) New Construction or Conversion of Small Structures** (Class 3: 14 CCR Section 15303). The District has constructed new small structures and converted other small structures, not involving use of significant amounts of hazardous substances, and found these projects to be exempt from CEQA. Under this category, for example:~~
 - ~~the District has constructed~~ion of small warehouses, multipurpose rooms and gyms on existing campus,
 - ~~**(d) Class 4: Minor Alterations to Land** (Class 4: 14 CCR Section 15304). The District has implemented various minor alterations to land and determined them to be exempt from CEQA. Under this category, for example:~~
 - ~~such as new landscaping~~
 - ~~filling of earth into previously excavated land with compatible material~~
 - ~~minor trenching and backfilling where the surface was restored~~
 - ~~and construction of athletic fields:~~
 - ~~**(e) Class 9: Inspections** (Class 9: 14 CCR Section 15309). The District has conducted inspection activities at existing and proposed facilities, and has determined that these inspections are exempt from CEQA.~~
 - ~~**(f) Class 11: Accessory Structures** (Class 11: 14 CCR Section 15311). The District has constructed minor structures accessory ancillary to existing facilities and found these projects to be exempt from CEQA. Under this category, for example:~~
 - ~~such as small parking lots~~
 - ~~and restroom facilities~~
- ~~and determined that these activities are exempt from CEQA.~~

4. Program Description

- ~~(g)~~ **Class 12: Surplus Government Property Sales** (~~Class 12:~~ 14 CCR Section 15312). The District has disposed of surplus property and determined that such disposal is exempt from CEQA in particular cases.
- ~~(h)~~ **Class 14: Minor Additions to Schools** (~~Class 14:~~ 14 CCR Section 15314). The District has constructed a wide variety of minor additions to existing schools where the addition does not increase the original student capacity by more than 25% or ten classrooms, whichever is less, and found these projects to be exempt from CEQA. Under this category, for example:
 - ~~including but not limited to installation of portable classrooms~~
 - ~~and expansion of playgrounds. The District has determined that such projects are exempt from CEQA where the addition does not increase the original student capacity by more than 25% or ten classrooms, whichever is less.~~
- ~~(i)~~ **Class 22: Educational or Training Programs Involving No Physical Changes** (~~Class 22:~~ 14 CCR Section 15322). The District has implemented educational and training programs that involve no physical changes to the environment, and determined that the programs are exempt from CEQA. Under this category, for example:
 - ~~These programs include development of curriculum and training methods~~
 - ~~changes to curriculum and training methods~~
 - ~~and changes in grade structure which do not result in changes in student transportation.~~
- ~~(j)~~ **Class 23: Normal Operations of Facilities for Public Gatherings** (~~Class 23:~~ 14 CCR Section 15323). At existing schools, the District operates venues for public gatherings such as athletic fields and auditoriums. The District has determined that the normal operations of such venues are exempt from CEQA.
- ~~(k)~~ **Class 30: Minor Actions to Prevent, Minimize, Stabilize, Mitigate or Eliminate the Release or Threat of Release of Hazardous Waste or Hazardous Substances** (~~Class 30:~~ 14 CCR Section 15330). The District has conducted minor cleanup of hazardous waste and/or hazardous substances at various facilities. Where the requirements of State CEQA Guidelines Section 15330 are met, the District has determined that such minor cleanups are exempt from CEQA.
- **Class 31: Historical Resource Restoration/Rehabilitation** (14 CCR Section 15331). The District has completed projects that involved maintenance, repair, stabilization, rehabilitation, restoration, preservation, conservation or reconstruction of historical resources in a manner consistent with the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings (1995). Alteration activities at historical resources that are not considered a "project" under CEQA and that can be accomplished without review by a qualified architectural historian or OEHS are shown in Table 4-1 and fully described in Appendix ~~EB~~-3 of this EIR.

4. Program Description

This list is intended to be representative only, and is not an exhaustive listing of the many categorical exemptions that the District has relied on, or that may be available to the District in the future, under the State CEQA Guidelines.

4.8.2 Exceptions to Exemptions

There are certain exceptions to the projects that qualify for a CEQA Exemption and activities that do not require OEHS review. Where an exception applies, FSD staff must notify OEHS, and obtain an OEHS CEQA determination before proceeding with the activity. The exceptions are discussed below.⁶³

Table 4-3 CEQA and OEHS Exceptions

	<u>Exceptions</u>	<u>"Projects" that qualify for CEQA Statutory or Categorical Exemption</u>	<u>"Activities" Not Requiring OEHS Review</u>
A.	<u>Historic Resources.</u> Any construction activity at a school campus that has or may have historic resources. OEHS is currently updating the list of existing school campuses that have historical resources (see "Historic Resource Exempt Activities" for a list of activities that are generally exempt from review by OEHS and a qualified architectural historian).	X	X
B.	<u>Sensitive Biological Resources.</u> Removal or alteration of the following natural resources, either direct or indirect through habitat modification: - Oak trees - Undisturbed areas containing native vegetation - Water courses such as lakes, rivers, vernal pools, seasonal streams, or marshy areas - Species identified as a candidate, sensitive, or special status pursuant to federal, state or local plans, policies or regulations.	X	X
C.	<u>Adjacent Noise Sensitive Uses.</u> Any exterior construction activity within 500 feet of an offsite noise sensitive land use, such as a residence or a hospital.		X
D.	<u>Hazardous Waste Sites.</u> Any activity that may disturb soil on a site included on any list compiled pursuant to Government Code Section 65962.5.	X	X
E.	<u>Significant Interior Modernization.</u> Any modernization project that will affect 20-percent or more of the total building square footage of an existing campus.		X
F.	<u>Activities Requiring State Funding.</u> The District may not be able to recover state funds unless OEHS has reviewed the activity and prepared a Notice of Exemption under CEQA.		X
G.	<u>Cumulative Impact.</u> Successive projects of the same type in the same place that over time would have a significant cumulative impact.	X	X
H.	<u>Significant Effect.</u> Any activity where there is a reasonable possibility that it will have a significant effect on the environment due to unusual circumstances.	X	X
I.	<u>Scenic Highways.</u> Any activity that may result in damage to scenic resources, including but not limited to, trees, historic buildings, rock outcroppings, or similar resources, within a highway officially designated as a state scenic highway.	X	X

⁶³ Items A through F are based on CEQA Guidelines Section 15300.2; *Los Angeles Unified School District Procedures for Implementing the California Environmental Quality Act*, December 2002; and Exhibit B of the memorandum titled "Activities Not Requiring OEHS Review" from Angelo Bellomo to James McConnell, July 27, 2006. Items G through I are based on CEQA Guidelines Section 15300.2.

4. Program Description

~~Projects Found to Be Categorically Exempt⁶⁴~~

~~Pursuant to Sections 15022(a)(1)(C) and 15061 of the State CEQA Guidelines, this section sets forth a list of specific types of Projects often handled by the District that have been found to be categorically exempt from CEQA in particular cases. Citations in parentheses are references to the State CEQA Guidelines. Under the State CEQA Guidelines, the District may only rely on Categorical Exemptions as long as none of the exceptions set forth in State CEQA Guidelines Section 15300.2 apply.~~

- ~~(a) Existing Facilities (Class 1: 14 CCR Section 15301). The District has performed a wide variety of operational, maintenance, repair and alteration activities at existing facilities that the District has found to be categorically exempt from CEQA, because the activities involved no or negligible expansion of use. The District has found to be exempt, for example, the following activities in specific circumstances: minor interior and exterior alterations, restoration of damaged structures and equipment to meet current standards, small additions to existing structures, addition of new copy on existing on and off premise signs, maintenance of existing landscaping, and demolition of small structures including accessory structures such as fences.~~
- ~~(b) Replacement or Reconstruction (Class 2: 14 CCR Section 15302). The District has replaced and reconstructed existing structures and facilities where a new structure was located on the same site as a replaced structure, and the new structure had substantially the same purpose and capacity as the replace structure. The District has applied this exemption, for example, to the replacement of a portable classroom with another portable classroom of substantially the same purpose and capacity.~~
- ~~(c) New Construction or Conversion of Small Structures (Class 3: 14 CCR Section 15303). The District has constructed new small structures and converted other small structures, not involving use of significant amounts of hazardous substances, and found these projects to be exempt from CEQA. Under this category, for example, the District has constructed small warehouses, multipurpose rooms and gyms.~~
- ~~(d) Minor Alterations to Land (Class 4: 14 CCR Section 15304). The District has implemented various minor alterations to land and determined them to be exempt from CEQA, such as new landscaping, filling of earth into previously excavated land with compatible material, minor trenching and backfilling where the surface was restored and construction of athletic fields.~~
- ~~(e) Inspections (Class 9: 14 CCR Section 15309). The District has conducted inspection activities at existing and proposed facilities, and has determined that these inspections are exempt from CEQA.~~
- ~~(f) Accessory Structures (Class 11: 14 CCR Section 15311). The District has constructed minor structures accessory to existing facilities, such as small parking lots and restroom facilities, and determined that these activities are exempt from CEQA.~~
- ~~(g) Surplus Government Property Sales (Class 12: 14 CCR Section 15312). The District has disposed of surplus property and determined that such disposal is exempt from CEQA in particular cases.~~

⁶⁴Los Angeles Unified School District Procedures For Implementing The California Environmental Quality Act. December 2002.

4. Program Description

- ~~(h) Minor Additions to Schools (Class 14: 14 CCR Section 15314). The District has constructed a wide variety of minor additions to existing schools, including but not limited to installation of portable classrooms and expansion of playgrounds. The District has determined that such projects are exempt from CEQA where the addition does not increase the original student capacity by more than 25% or ten classrooms, whichever is less.~~
- ~~(i) Educational or Training Programs Involving No Physical Changes (Class 22: 14 CCR Section 15322). The District has implemented educational and training programs that involve no physical changes to the environment, and determined that the programs are exempt from CEQA. These programs include development of curriculum and training methods, changes to curriculum and training methods, and changes in grade structure which do not result in changes in student transportation.~~
- ~~(j) Normal Operations of Facilities for Public Gatherings (Class 23: 14 CCR Section 15323). At existing schools, the District operates venues for public gatherings such as athletic fields and auditoriums. The District has determined that the normal operations of such venues are exempt from CEQA.~~
- ~~(k) Minor Actions to Prevent, Minimize, Stabilize, Mitigate or Eliminate the Release or Threat of Release of Hazardous Waste or Hazardous Substances (Class 30: 14 CCR Section 15330). The District has conducted minor cleanup of hazardous waste and/or hazardous substances at various facilities. Where the requirements of State CEQA Guidelines Section 15330 are met, the District has determined that such minor cleanups are exempt from CEQA.~~

~~This list is intended to be representative only, and is not an exhaustive listing of the many categorical exemptions that the District has relied on, or that may be available to the District in the future, under the State CEQA Guidelines.~~

4.9 INTENDED USES OF THIS PROGRAM EIR

This is a program-level EIR that examines the potential environmental impacts of the proposed SUP. This EIR is also being prepared to address various actions by the Board of Education and others to adopt and implement the SUP and the individual types of projects outlined under the SUP.

This SUP EIR serves the following purposes:

- To inform the general public, interested public agencies, and the Board of the potential environmental effects, LAUSD Standard Conditions, and alternatives to the proposed SUP.
- To provide the Board of Education with information that enables them to make project decisions that take account of environmental consequences.
- To provide project-level review for individual projects where sufficient detail exists to reduce the need for subsequent environmental documents.

4. Program Description

- To provide a basis for tiering subsequent environmental documents pursuant to the CEQA Guidelines Sections 15152 (see Appendix D).
- To facilitate the opportunity for SUP-related site-specific projects to utilize CEQA infill streamlining provisions.⁶⁵
- To develop LAUSD Standard Conditions from compiled and updated existing LAUSD standards, guidelines, specifications, practices, plans, policies, programs, and project design features (see Table 4-1).
- To provide a template for a Monitoring and Reporting Program that ensures compliance with the LAUSD Standard Conditions (see Appendix D).

The analysis in the program EIR does not provide complete environmental review for each individual future school construction project proposed as part of the SUP.

~~The intent of this document is to streamline future environmental compliance for site-specific projects included in the SUP and reduce the need to prepare repetitive environmental studies. The LAUSD will use the analysis in this program EIR as the framework in later CEQA documents prepared for site-specific individual projects through a process known as “tiering.”⁶⁶ Each future action identified as a “project” under CEQA (site-specific project proposed under the SUP that requires a discretionary action) would have its own CEQA document prepared. Future documents would incorporate this Program EIR and concentrate on the site-specific issues not already covered in the Program EIR. The tiered EIR or negative declaration on the later project is limited to effects which:~~

~~1) Were not examined in the prior EIR; or~~

~~Are susceptible to substantial reduction or avoidance by the choice of specific revisions in the project.⁶⁷~~

~~A project-level EIR is required when the initial study finds that it may cause significant effects on the environment that was not adequately addressed in the program EIR.⁶⁸ LAUSD will apply the thresholds of significance in this program EIR in the context of future projects to determine the significance of environmental effects. For each site specific project, LAUSD would determine the appropriate CEQA~~

⁶⁵ CEQA Guidelines 15183.3 along with Appendix M and N streamline CEQA processing for urban infill school projects. See Appendix E of this EIR.

⁶⁶ 14 CCR Sections 15385 and 15152. “Tiering” refers to the coverage of general matters in broader EIRs (such as on general plans or policy statements) with subsequent narrower EIRs or ultimately site-specific EIRs incorporating by reference the general discussions and concentrating solely on the issues specific to the EIR subsequently prepared. Tiering is appropriate when the sequence of EIRs is:

(a) From a general plan, policy, or *program EIR* to a program, plan, or policy EIR of lesser scope or to a *site-specific EIR*. ~~[emphasis added]~~

(b) From an EIR on a specific action at an early stage to a subsequent EIR or a supplement to an EIR at a later stage. Tiering in such cases is appropriate when it helps the Lead Agency to focus on the issues which are ripe for decision and exclude from consideration issues already decided or not yet ripe.

⁶⁷ 14 CCR Section 15152(d).

⁶⁸ 14 CCR Section 15152(f).

4. Program Description

~~document required to evaluate the environmental effects. The program EIR includes LAUSD Best Management Practices, Policies, and Standard Conditions and related performance standards that are incorporated into future site-specific projects.~~

4.9.1 Anticipated Agency Actions

It is the intent of this EIR to enable the Board ~~and other responsible agencies, and interested parties~~ to evaluate the environmental impacts of the proposed program, thereby enabling them to make informed decisions with respect to the requested entitlements, permits, or approvals. ~~There are no anticipated agency approvals, other than LAUSD, required for the SUP; however, depending on the type of project and location, future site-specific projects may require permits, approvals, review, coordination or other action from federal, State, regional, and/or local agencies as shown in Table 4-4. are:~~

Table 4-34 Anticipated Agency Approvals and Actions

Lead Agency	Discretionary Action
LAUSD Board of Education	Certification of the <u>Final EIR</u>
	Adoption of Mitigation Monitoring and Reporting Program <u>LAUSD Standards</u>
	Adoption of revised Best Management Practices and Standard Conditions
	<u>Adoption of Findings and Statement of Overriding Considerations</u>
	Approval of School Upgrade Program
Responsible Agency ^{69,70}	Typical Discretionary Action
FEDERAL*	
*——US Army Corps of Engineers (Corps)	<u>Permit - Clean Water Act, Section 404 permit for discharges of dredge or fill material into "waters of the US"</u>
STATE*	
*——California Department of Fish and Wildlife (CDFW)	<u>Issuance of No Effect Determination; Agreement - Fish and Game Code section 1600 et seq. (Section 1602 Lake or Streambed Alteration Agreement); Permit - Fish and Game Code section 2050 et seq. (California Endangered Species Act protocol species surveys and take permits)</u>
*——California Department of Toxic Substances Control (DTSC)	<u>Approval of Phase I Environmental Site Assessment (ESA); Preliminary Environmental Assessment (PEA)/Supplemental Site Investigation (SSI); Removal Action Workplan (RAW)/Remedial Action Plan (RAP); Removal Action Completion Report (RACR); Remedial Design Document (RDD); and/or Operation & Maintenance (O&M) Plan; and ultimately issuance of a "No Further Action" determination</u> Approval of a Remedial Investigation/Feasibility Study (RI/FS); Remedial Action Plan (RAP); Quality Assurance and Quality Control Plan (QAQCP); Operation and Maintenance (O&M) Plan; Monitoring and Reporting Plan; site specific Health and Safety Plan (HASP); ultimately "No Further Action" Determination
——State Allocation Board (SAB)	<u>Approval of Funding</u>

⁶⁹ 14 CCR Section 15381. "Responsible Agency" means a public agency which proposes to carry out or approve a project, for which a Lead Agency is preparing or has prepared an EIR or Negative Declaration. For the purposes of CEQA, the term "Responsible Agency" includes all public agencies other than the Lead Agency which have discretionary approval power over the project.

⁷⁰ Reviewing Agencies include those agencies that do not have discretionary powers over the proposed project, but that may 1) review the EIR for adequacy and accuracy; 2) issue ministerial approvals or permits.

4. Program Description

Table 4-34 Anticipated Agency Approvals and Actions

——California Department of Education (CDE), School Facilities Planning Division	Approval of final site and school design for educational appropriateness
Responsible Agency^{71,72}	Typical Discretionary Action
California**——Department of General Services, Office of Public School Construction (OPSC)**	Approval of Funding
——California Department of General Services, Division of State Architect (DSA)	<u>Plan review and construction oversight for new school construction and alteration projects, including structural safety, fire and life safety, and access compliance. DSA approval is required for any project seeking state funding and must be completed before the project begins construction. Approval of future site specific project construction drawings</u>
*——State Office of Historic Preservation (OHP)	<u>Approval of historic building preservation and renovation plans</u>
*——California Department of Transportation (Caltrans)	<u>Review of analysis methodology for school traffic on near freeways and ramps</u>
*——California Department of Conservation (DOC)	<u>Agriculture preservation agreement</u>
*——California Department of Parks and Recreation (DPR)	<u>Joint Use Agreement -for state parkland</u>
*——Native American Heritage Commission (NAHC)	<u>Issuance of current Native American tribal representative contact list and known resources; consultation; mitigation measures</u>
*——California Coastal Commission (CCC)	<u>Coastal Development Permit for development within the Coastal Zone boundary</u>
*——State Water Resources Control Board (SWRCB)	<u>Review of Notice of Intent (NOI) to obtain permit coverage; Issuance of General Permit for Discharges of Storm Water Associated with Construction Activity; Review of Storm Water Pollution Prevention Plan (SWPPP) (General Construction Permit regulates stormwater and nonstormwater discharges associated with construction activities)</u>
REGIONAL*	
<u>Local Native American Tribes</u>	<u>Coordination and assistance with preparation of Native American tribal monitoring program</u>
*——Los Angeles Regional Water Quality Control Board (RWQCB)	<u>Issue National Pollution Discharge Elimination System (NPDES) NPDES permit; issuance of waste discharge requirement (Dewater Permit); Clean Water Act; Section 401 Water Quality Certification</u>
*——South Coast Air Quality Management District (SCAQMD)	<u>Review and file LAUSD submittals for Rule 403 Fugitive Dust; Rule 1403 Asbestos Emissions from Demolition/Renovation Activities; Rule 201 Permit to Construct; Rule 203 Permit to Operate (boilers and generators); Rule 1166 Volatile Organic Compound Emissions from Decontamination of Soil, and site-specific Soil Mitigation Plan; site monitoring, approval of Construction Emission/Dust Control Plan, architectural coatings, and VOC Contaminated Soil Mitigation Plan</u>
LOCAL* (County and/or City)	
<u>Parks and Recreation</u>	<u>Joint Use Agreement for parkland</u>
<u>Los Angeles Conservancy or Historic Preservation</u>	<u>Approval of construction on historic campus</u>

⁷¹ 14 CCR Section 15381. “Responsible Agency” means a public agency which proposes to carry out or approve a project, for which a Lead Agency is preparing or has prepared an EIR or Negative Declaration. For the purposes of CEQA, the term “Responsible Agency” includes all public agencies other than the Lead Agency which have discretionary approval power over the project.

⁷² Reviewing Agencies include those agencies that do not have discretionary powers over the proposed project, but that may 1) review the EIR for adequacy and accuracy; 2) issue ministerial approvals or permits.

4. Program Description

Table 4-34 Anticipated Agency Approvals and Actions

Ordinance	
* County and/or City -Fire Department	DSA approval of the Fire/Life Safety portion of a project requires Local Fire Authority (LFA) review of: 1. <u>elevator/stair access for emergency rescue and patient transport</u> ; 2. <u>access roads, fire lane markings, pavers and gate entrances</u> ; 3. <u>fire hydrant location and distribution</u> ; 4. <u>fire flow (location of post indicator valve, fire department connection, and detector check valve assembly)</u> . Approval of Site Plan for Emergency Access; Fire Hydrant Placement; Fire Flow Upgrades
Responsible Agency ^{73,74}	Typical Discretionary Action
* County and/or City -Public Works Department	Approval of drainage improvements and grading plans as they relate to drainage; Approval of offsite improvements permit or "B-Permit" ⁷⁵ off-site road improvements
* City -Planning Department	Approval of fire hydrant locations and specifications; Approval of s ; approval of designs of intersections of project driveways with City roadways street vacation, and roadway classification changes
Traffic Engineering Department	Approval of Memorandum of Understanding (MOU for methodology used for traffic study); Approval of changes to parking restrictions; installation of crosswalks, advance school zone warning signs, school parking signage, traffic controls, crossing guards, and traffic management/control and vehicle enforcement; Approval of engineering designs for project driveways at roadways, and other intersection improvements (traffic lights, changes to turn lanes, road widening, etc.)
Reviewing Agency ⁷⁶	Action
* County -Sherriff's Department and/or City Police Department	Site plan review for fire, life, safety hazards, access and visibility.
* California Department of Toxic Substances Control (DTSC)	Determination of "No Further Action"
** State Allocation Board (SAB)	Approval of Funding
** California Department of Education, School Facilities Planning Division (CDE)	Approval of site and school design for educational appropriateness
** Department of General Services, Office of Public School Construction (OPSC)	Approval of Funding
** California Department of General Services, Division of State Architect (DSA)	Approval of future site specific project construction drawings
* State Office of Historic Preservation (OHP)	Historic building preservation and renovation
* California Department of Transportation (Caltrans)	School traffic near freeways and ramps
* California Department of Conservation (DOC)	Agriculture preservation

⁷³ 14 CCR Section 15381. "Responsible Agency" means a public agency which proposes to carry out or approve a project, for which a Lead Agency is preparing or has prepared an EIR or Negative Declaration. For the purposes of CEQA, the term "Responsible Agency" includes all public agencies other than the Lead Agency which have discretionary approval power over the project.

⁷⁴ Reviewing Agencies include those agencies that do not have discretionary powers over the proposed project, but that may 1) review the EIR for adequacy and accuracy; 2) issue ministerial approvals or permits.

⁷⁵ A "B" Permit is typically issued for extensive public works improvements including the widening of streets and alleys, the changing of existing street grade, construction of bridges, retaining walls, and the installation of sewer, storm drains, street lighting, and traffic signals.

⁷⁶ Reviewing Agencies include those agencies that do not have discretionary powers over the proposed project, but that may 1) review the EIR for adequacy and accuracy; 2) issue ministerial approvals or permits.

4. Program Description

Table 4-34 Anticipated Agency Approvals and Actions

* California Department of Parks and Recreation (DPR)	Joint use of state parkland
Reviewing Agency ⁷⁷	Action
* Native American Heritage Commission (NAHC)	Native American tribal representative contact list; consultation; mitigation measures

* These agencies would have no role in approval process for the SUP; however, future site-specific projects may require permits, or approvals, review, or coordination.
 ** Per Education Code Section 17070.46, the approvals from CDE, DSA, SAB and OPSC are considered ministerial actions and as such, these agencies are not "responsible agencies" under the California Environmental Quality Act (CEQA).

⁷⁷ Reviewing Agencies include those agencies that do not have discretionary powers over the proposed project, but that may 1) review the EIR for adequacy and accuracy; 2) issue ministerial approvals or permits.

5. Environmental Analysis

Chapter 5 examines the environmental setting, ~~impacts, and mitigation measures~~ Standard Conditions, and environmental impacts associated with the proposed SUP.¹ This chapter is divided into sections for respective environmental ~~issue areas~~ topics.

The scope of the environmental analysis was determined using the Notice of Preparation (NOP) that was circulated to agencies, organizations, and other interested parties. This EIR includes all 18 environmental topics described in the CEQA Guidelines Appendix G and LAUSD Checklist and considers and incorporates appropriate information from public and 5 agency comment letters received during the NOP comment period (November 18, 2013, to December 18, 2013); ~~see Appendix A~~.² and 6 agency comment letters received during the NOA-Draft EIR comment period (June 24, 2014 to August 8, 2014) and comment period extension (August 8, 2014 to September 30, 2014) (see Appendix A). ~~E-These Environmental-nvironmental~~ These Environmental topics and their corresponding sections are:

- 5.1 Aesthetics
- 5.2 Agriculture and Forestry Resources
- 5.3 Air Quality
- 5.4 Biological Resources
- 5.5 Cultural Resources
- 5.6 Geology and Soils
- 5.7 Greenhouse Gas Emissions
- 5.8 Hazards and Hazardous Materials
- 5.9 Hydrology and Water Quality
- 5.10 Land Use and Planning
- 5.11 Mineral Resources
- 5.12 Noise
- 5.13 Pedestrian Safety
- 5.14 Population and Housing
- 5.15 Public Services
- 5.16 Recreation

¹ SUP consists of Type 1. New Construction on New Property and Type 2. New Construction on Existing Campus; Type 3. Modernization, Repair, Replacement, Upgrade, Remodel, Renovation and Installation, and; Type 4. Operational and Other Campus Changes. See EIR Chapter 4 for full SUP description.

² Los Angeles County Clerk posting date was November 14, 2014 to December 14, 2014 and the Office of Planning and Research, State Clearinghouse State agency review date was November 14, 2014 to December 13, 2014.

5. Environmental Analysis

- 5.17 Transportation and Traffic
- 5.18 Utilities and Service Systems

Sections 5.1 through 5.18 provide a detailed discussion of the environmental setting, impacts associated with the SUP, and LAUSD ~~Standards Standard Conditions~~ (project design features, guidelines, specifications, practices, policies, and standard conditions) incorporated into SUP-related individual site-specific projects to reduce significant impacts where required. The residual impacts following the implementation of agency laws and regulations and LAUSD ~~Standards Standard Conditions~~ are also discussed.

Organization of Environmental Analysis

To assist the reader in reviewing information about the respective environmental issues, each section (Sections 5.1 to 5.18) is organized as follows:

- Environmental Setting (regulatory and physical)
- Thresholds of Significance
- Environmental Impacts
- Applicable Regulations and Standard Conditions
- Level of Significance Before Mitigation
- Mitigation Measures
- Level of Significance After Mitigation

In addition, ~~the chapter 1, Executive Summary~~ includes a table summarizing all the impacts by environmental topic along with any required mitigation.

Terminology Used in This EIR

For each impact identified in this EIR, a statement of the level of significance of the impact is provided. While criteria for determining significant impacts are unique to each issue area, the environmental analysis applies a uniform classification of the impacts based on the following definitions consistent with CEQA and the CEQA Guidelines:

- A designation of *no impact* is given when no changes in the environment would occur.
- A *less than significant impact* would cause no substantial adverse change in the environment.
- A *less than significant impact with mitigation incorporated* avoids substantial adverse impacts on the environment through mitigation measures that are required after consideration of any project design features (PDFs), implementation of Standard Conditions of Approval (SCs) and compliance with federal, state and local laws and regulations.

5. Environmental Analysis

- A *significant unavoidable impact* would cause a substantial adverse effect on the environment, and there are no feasible mitigation measures, or mitigation measures would reduce impacts but not to less than significant levels, the remaining impacts are considered significant and unavoidable.~~no feasible mitigation measures would be available to reduce the impact to a less than significant level.~~



5. Environmental Analysis

5.1 AESTHETICS

This section of the program EIR evaluates the potential for implementation of the SUP to impact aesthetic resources in the District. This section discusses regulatory framework (plans and policies from several jurisdictional agencies and LAUSD ~~standard~~ Standard conditions) and physical setting (~~guidelines, specifications, practices, policies, and project design features (LAUSD Standards), along with the existing aesthetics setting~~ throughout the SUP area with examples of scenic vistas and other significant aesthetic features), and along with possible environmental view, neighborhood character, light, glare, and shadow impacts that may occur during future phases of the SUP and as SUP-related site-specific projects are implemented under the SUP.

TERMINOLOGY

Aesthetic impact assessment generally deals with the issue of contrast, or the degree to which elements of the environment differ visually. Aesthetic features occur in a diverse array of environments, ranging in character from urban centers to rural regions and wildlands. **Adverse visual effects** can include the loss of natural features or areas, the removal of urban features with aesthetic value, or the introduction of contrasting urban features into natural areas or urban settings.

Natural features include, but are not limited to: open space; native or ornamental vegetation/landscaping; topographic or geologic features; and natural water sources. The loss of natural aesthetic features or the introduction of contrasting urban features may have a local impact, or, if part of a larger landscape, may contribute to a cumulative decline in overall visual character.

Urban features include, but are not limited to: structures of architectural or historic significance or visual prominence; public plazas, art or gardens; heritage oaks or other protected trees or plants; consistent design elements (such as setbacks, massing, height, and signage) along a street or district; pedestrian amenities; landscaped medians or parks.

Aesthetics generally refer to the identification of visual resources and the quality of what can be seen, or overall visual perception of the environment.

Views refer to visual access and obstruction, or whether it is possible to see a focal point or panoramic view from an area.

Shading issues are concerned with effects of shadows cast by existing or proposed structures on adjacent land uses.

Nighttime illumination addresses the effects of a proposed project's exterior lighting upon adjoining uses.

Luminaire. The complete lighting unit (fixture), consisting of a lamp, or lamps and ballast(s) (when applicable), together with the parts designed to distribute the light (reflector, lens, diffuser), to position and protect the lamps, and to connect the lamps to the power supply.

5. Environmental Analysis

AESTHETICS

Footcandle. The unit of measure expressing the quantity of light received on a surface. One footcandle is the illuminance produced by a candle on a surface one foot square from a distance of one foot.

Glare. Lighting entering the eye directly from luminaires or indirectly from reflective surfaces that causes visual discomfort or reduced visibility.

Light Trespass or Light Spill. Light that falls beyond the property it is intended to illuminate.

Fully Shielded Luminaire. A luminaire constructed and installed in such a manner that all light emitted by the luminaire, either directly from the lamp or a diffusing element, or indirectly by reflection or refraction from any part of the luminaire, is projected below the horizontal plane through the luminaire's lowest light-emitting part.¹

5.1.1 Environmental Setting

5.1.1.1 REGULATORY FRAMEWORK

State and local laws, regulations, plans, and guidelines, ~~along with LAUSD Standards~~ are summarized below. The following regulatory framework discussion does not include all plans and policies that relate to aesthetics 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 date when a proposed site-specific school project undergoes review. Therefore, this section provides a general discussion of the most important plans and policies that apply to SUP-related projects. Some of these are not directly applicable to the SUP or site-specific projects implemented under the SUP; however they are included to assist in identifying potential impacts and significance thresholds. ~~Applicable LAUSD Standard Conditions of Approval are also listed.~~ See *Applicable Regulations and Standard Conditions* at end of this chapter for those that require District compliance.

State

California Streets and Highways Code, Sections 260 through 263

The **California Scenic Highway Program**, which was adopted by the Legislature in 1963, seeks to preserve and protect areas of outstanding natural beauty that are visible from State highways. A highway may be designated as scenic depending on how much of the natural landscape can be readily observed, the scenic quality of that landscape, and the extent to which development may intrude on view enjoyment.² Within the District, a number of highways are considered eligible for scenic highway designation or are so designated (see Table 5.1-1).

¹ International Dark-Sky Association (IDA). Model Lighting Ordinance. http://www.darksky.org/assets/documents/MLO/MLO_FINAL_June2011.pdf; IDA is the recognized authority on light pollution. Founded in 1988, IDA is the first organization to call attention to the hazards of light pollution.

² California Department of Transportation (Caltrans), 2014. California Scenic Highway Program, updated September 7, 2011. http://www.dot.ca.gov/hq/LandArch/scenic_highways/index.htm.

5. Environmental Analysis
AESTHETICS

Table 5.1-1 Selected Scenic Highways and Corridors

Scenic Highway, Byway, Route, or Corridor	Caltrans Status (Eligible or Officially Designated)	Los Angeles County General Plan Scenic Priority	Other Designations
SR 1 (Pacific Coast Highway (PCH)) – between SR 187 and SR 101	Eligible	1st Priority Scenic Highway	–
SR 2 (Angeles Crest Highway) – between La Canada-Flintridge and Wrightwood	Officially Designated	–	–
SR 27 (Topanga Canyon. Boulevard.) – between SR 1 and Mulholland Dr.	Eligible	1st Priority Scenic Highway	–
SR 27 (Topanga Canyon Boulevard) – N of Valley Circle Boulevard	–	2nd Priority Scenic Highway	–
SR 39 – between I-210 and SR 2	Eligible	–	–
SR 110 (Pasadena Freeway)	–	–	National Scenic Byway Historic Parkway; CA Historic Parkway
SR 118 (Reagan Freeway) – between SR 23 and Desoto Ave.	Eligible	2nd Priority Scenic Highway	–
I-5 (Golden State Freeway) – between I-210 and Castaic	Eligible	1st Priority Scenic Highway	–
I-5 (Golden State Freeway) – between I-210 and I-405	Eligible	2nd Priority Scenic Highway	–
I-210 (Foothill Freeway)	Eligible	1st Priority Scenic Highway	–
I-405 (San Diego Freeway) – between I-5 and SR 118 and between Mulholland Drive and Wilshire Boulevard	–	2nd Priority Scenic Highway	–
US Route 101 (Ventura Freeway) – west of Valley Circle Boulevard	–	2nd Priority Scenic Highway	–
Big Tujunga Canyon Road	–	2nd Priority Scenic Highway	–
La Tuna Canyon Road	–	2nd Priority Scenic Highway	–
Little Tujunga Road	–	2nd Priority Scenic Highway	–
Lopez Canyon Road	–	2nd Priority Scenic Highway	–
Los Feliz Boulevard	–	2nd Priority Scenic Highway	–
Malibu Canyon – between Las Virgenes Highway and Lost Hills Rd.	Officially Designated	–	–
Mount Hollywood Drive	–	2nd Priority Scenic Highway	–
Mulholland Drive – between PCH and Kanan Dume Road, and from Cornell Road to Las Virgenes Road	Officially Designated	1st Priority Scenic Highway	–
Old Topanga Canyon Road	–	2nd Priority Scenic Highway	–
Saddle Peak Road	–	2nd Priority Scenic Highway	–
San Vicente Boulevard/Wilshire Boulevard	–	2nd Priority Scenic	–

5. Environmental Analysis

AESTHETICS

Table 5.1-1 Selected Scenic Highways and Corridors

Scenic Highway, Byway, Route, or Corridor	Caltrans Status (Eligible or Officially Designated)	Los Angeles County General Plan Scenic Priority	Other Designations
West of Interstate 110		Highway	
Santa Monica Boulevard (SR 2)	Officially Designated	–	–
Santa Susana Pass Road	–	2nd Priority Scenic Highway	–
Sunset Boulevard/Cesar Chavez Avenue West of Main Street	–	2nd Priority Scenic Highway	–

Sources: California Department of Transportation (Caltrans), Website Updated: December 19, 2013. California Scenic Highway Program, updated September 7, 2011. <http://www.dot.ca.gov/hq/LandArch/scenic/cahisys.htm>
 Los Angeles County General Plan, 1980. <http://planning.lacounty.gov/generalplan/existing>

Highways considered eligible for designation have substantial value as scenic resources. In order for a highway to be officially designated as a scenic resource, the local city or county must adopt a scenic Corridor Protection Program and apply to Caltrans for official designation. Without official designation and the accompanying scenic corridor protection, nearby development could degrade the highway’s scenic value even if it is considered eligible for designation.

The sponsoring city or county must also adopt ordinances, zoning, and/or planning policies to preserve the scenic quality of the corridor or prove that such regulations already exist in local codes and ordinances. The corridor protection requirements should be sufficiently detailed and must present a workable strategy to protect the scenic character of the corridor. These ordinances and/or policies form the Corridor Protection Program of the California Scenic Highway Program.

California Public Resources Code, Division 20

Part of the District is in the Coastal Zone, where proposed projects may be subject to the requirements of the **California Coastal Act**.³ Section 30251 of the Coastal Act discusses the act’s aesthetic requirements, wherein the scenic qualities of coastal areas must be considered and protected in the development process. This section states “The scenic and visual qualities of coastal areas shall be considered and protected as a resource of public importance. Permitted development shall be sited and designed to protect views to and along the ocean and scenic coastal areas, to minimize the alteration of natural land forms, to be visually compatible with the character of surrounding areas, and, where feasible, to restore and enhance visual quality in visually degraded areas.”

Permitted development must be located and designed so as to protect the scenic and visual qualities of coastal areas. This includes protecting views to and along the ocean and scenic coastal areas, matching the visual character of surrounding areas, and, where feasible, restoring and enhancing visual quality in visually degraded areas. Pursuant to the Coastal Act, cities and counties within the Coastal Zone must develop Local Coastal Plans.

³ California Public Resources Code, Division 20, California Coastal Act (2014).

5. Environmental Analysis AESTHETICS

California Code of Regulations, Title 24, Part 2

Current law states that every local agency enforcing building regulations, such as cities and counties, must adopt the provisions of the **California Building Code (CBC)** within 180 days of its publication. The publication date of the CBC is established by the California Building Standards Commission. The most recent building standard adopted by the legislature and used throughout the state is the 2013 version, often with local, more restrictive amendments that are based on local geographic, topographic, or climatic conditions. These codes provide minimum standards to protect property and public safety by regulating the design and construction of excavations, foundations, building frames, retaining walls, and other building elements to mitigate the effects of seismic shaking and adverse soil conditions. The CBC contains standards for outdoor lighting that are intended to improve energy efficiency, and reduce light pollution and glare by regulating light power and brightness, shielding, and sensor controls.⁴

California Code of Regulations, Title 5, Section 14010

The function of the **California Department of Education School Facilities Planning Division (CDE SFPD)** is to review and approve school district sites and construction plans. Prior to approving a site for school purposes, the SFPD, in accordance with their design standards, reviews many factors, including environmental hazards, proximity to airports, freeways, and power transmission lines, as well as scenic resources and aesthetics. CCR Title 5, Section 14010 specifically requires the consideration of aesthetics: “The district shall consider environmental factors of light, wind, noise, aesthetics, and air pollution in its site selection process.”

In many instances, the District needs to complete the process of identifying the site and to have SFPD approval for the site prior to applying for site acquisition funding. As previously discussed, the CDE is given the authority in law to develop standards for school site acquisition. The CDE uses these standards to review a site and determine if it is an appropriate location for a new or expanded school facility. In the CDE SFPD’s current Initial School Site Evaluation process, the criteria include scenic resources and aesthetics as one of many factors to be considered.⁵ This information is typically provided in the following documents/studies:

- SFPD 4.0, Initial School Site Evaluation
- SFPD 4.02, School Site Report

Local

City General Plans

The City of Los Angeles General Plan contains two elements that regulate the protection of aesthetics and views and identification of scenic highways in the SUP area. The Conservation Element confirms that one plan objective is to “protect and reinforce natural and scenic vistas as irreplaceable resources and for the aesthetic enjoyment of

⁴ California Building Standards Commission, <http://www.bsc.ca.gov/codes.aspx>, accessed on March 11, 2014.

⁵ California Code of Regulations, Title 5, Section 14010 et seq.; Education Code Sections 17070.50, 17251[a)].

5. Environmental Analysis

AESTHETICS

present and future generations.”⁶ One policy that seeks to attain this objective is to encourage or require property developers to retain significant existing landforms (e.g., ridgelines, bluffs, unique geologic features) and unique scenic features (e.g., mountains) and to protect the public’s ability to view these scenic features.

The current Transportation Element is also pertinent to aesthetic resources in the Program area. It addresses motorized and non-motorized transportation, along with scenic highways and bikeways citywide.⁷

Cities and communities within the District attendance boundaries have General Plans or community plans that guide development. Many of these plans establish goals and policies that pertain to aesthetic resources, thereby providing a measure of protection for significant visual resources.

Where a proposed LAUSD school project is inconsistent with a General Plan policy or zoning ordinance, state law provides for an exemption pending a two-thirds vote of the Board of Education.⁸ Under this law, the LAUSD may proceed with such a project.

LAUSD

Standard Conditions of Approval

LAUSD Standards

This table lists the aesthetic related standard conditions ~~and project design features (PDF)~~ that ~~are~~ will be included as part of each SUP-related project, as appropriate.

PDF Reference #	Topic	Trigger for Compliance	Implementation Phase	Standard Conditions of Approval <u>Standard Conditions!</u>
AESTHETICS				
Standard Conditions				
<u>SC-AE-00-1</u> Compliance	Degradation of neighborhood character	When a project will have aesthetic impacts from Demolition of historic building or construction of a new building	During project design	School Design Guide. This document outlines measures for re-use rather than destruction of historical resources. Requires the consideration of architectural appearance/consistency and other aesthetic factors during the preliminary design review for a proposed school upgrade project. <u>Architectural quality must consider compatibility with the surrounding community.</u>
<u>SC-AE-00-2</u> Compliance	Degradation of neighborhood character	When a project may increase graffiti and accumulation of rubbish and debris along the walls adjacent to public	During project operation	School Design Guide. This document outlines measures to reduce aesthetic impacts around schools, such as shrubs and ground treatments that deter taggers, vandal-resistant and graffiti-resistant materials, painting, etc.

⁶ City of Los Angeles Department of City Planning, 2001. Conservation Element, City of Los Angeles General Plan, adopted September 2001.

⁷ City of Los Angeles Department of City Planning, 2001. Transportation Element, City of Los Angeles General Plan, adopted September ~~1999~~ 2001.

⁸ California Government Code, Title 5, Division 2, Part 1, Chapter 1, Article 5.

5. Environmental Analysis AESTHETICS

PDF Reference #	Topic	Trigger for Compliance	Implementation Phase	Standard Conditions of Approval Standard Conditions!
		rights-of-way-		
AE-00 Compliance	Light spillage and glare	When a project will generate new light sources.	During and after installation of lights	School Design Guide. This document outlines requirements for lighting and measures to minimize glare for pedestrians, drivers and sports teams, and to avoid light spilling onto adjacent properties.
SC-AE-3	Degradation of neighborhood character and viewshed obstruction	Increase density, height, bulk, or decrease setback compared to the surrounding neighborhood; increase opportunities for graffiti	During project design	LAUSD shall assess a proposed project's consistency with the general character of the surrounding neighborhood, including any proposed changes to the density, height, bulk, and setback of new building (including stadium), addition, or renovation. Where feasible, LAUSD shall make appropriate design changes to reduce or eliminate viewshed obstruction and degradation of neighborhood character. Such design changes could include, but are not limited to, changes to campus layout, height of buildings, landscaping, and/or the architectural style of buildings.
SC-AE-040 Compliance	Outdoor signs with electronic message display	When a project will install or change a new school marquee	Prior to final design and prior to and during installation	Marquee Signs Bulletin BUL-5004.1. This policy provides guidance for the procurement and installation of marquee signs (outdoor sign with electronic message display) on District campuses. The policy includes requirements for the design, approval, placement, operation, and maintenance of electronic school marquees erected and operated at a LAUSD schools. The policy also includes measures to mitigate light and glare, such as the use of "luminaries" in connection with school construction.
SC-AE-00 5 Compliance	Shadows	When a project will include construction of buildings or structures taller than surrounding neighborhood	Prior to project approval	OEHS CEQA Specification Manual, Appendix F, Protocol for Shadow Analysis in CEQA Documents for Proposed School Sites. This document outlines the methodology and impact thresholds for shadow analysis.
SC-AE-6	Light and glare	Generate additional light and/or glare	During and after installation of lights	School Design Guide. This document outlines requirements for lighting and measures to minimize glare for pedestrians, drivers and sports teams, and to avoid light spilling onto adjacent properties.
SC-AE-74	Light spillage and glare	Generate additional light and/or glare When a project will generate new light sources	Prior to building occupation, first stadium event, or first use of lights.	LAUSD shall reduce the lighting intensity from the new sources on adjacent residences to no more than two foot-candles, measured at the residential property line. LAUSD shall utilize hoods, filtering louvers, glare shields, and/or landscaping as necessary to achieve the standard. The lamp enclosures and poles shall also be painted to reduce reflection. Following installation of lights the lighting contractor shall review and adjust lights to ensure the standard is met.

5.10.1.1 EXISTING CONDITIONS

The consideration of aesthetics in environmental impact evaluations dates to the passage of the National Environmental Policy Act of 1969. Since that time, the concept of aesthetics in environmental analysis has generally been construed as a suite of key visual resources that embrace both the natural (i.e., landscape) and built environments. In the context of school-related projects or programs, aesthetics often include:

5. Environmental Analysis

AESTHETICS

- Undisturbed and/or unique viewsapes or vistas
- Natural or undisturbed areas (i.e., open space)
- Unique natural and manmade landscapes, buildings/structures, or features
- Areas that have been formally recognized as a significant visual resource by a local, State, or Federal agency.

The sensitivity of an aesthetic or visual resource generally depends on its unique qualities as well as the visual access afforded to a typical prospective viewer (i.e., is it readily viewed or are there impediments to viewing). Consistent with its predominantly urban character, the District possesses many man-made aesthetic resources. These resources can include individual buildings or groups of buildings or structures that possess a distinctive appearance, history, and/or societal or cultural importance. Such resources can also include locations that are judged important to a region's history and sense of place.

Consistent with a programmatic scope, this discussion generally characterizes aesthetic resources within the District. Specific school upgrade projects have not been scoped at this time, and an evaluation of site-specific aesthetic resources is not feasible. Each future school project would require a site-specific aesthetic analysis during CEQA review. Moreover, because the SUP will be implemented over the course of several years, a detailed description of aesthetic resources could become obsolete over time as resources are added and deleted.

Visual Character

The overall visual character in the District is highly diverse, reflecting a wide range of landforms as well as variations in the built environment. Urban and suburban residential and commercial land uses predominate and the area is heavily populated, constituting the second most populous metropolitan region in the nation. The Los Angeles area is generally bound by the San Gabriel and Santa Susana Mountains to the north and northwest, the Santa Monica Mountains to the west, and the Pacific Ocean to the west and south. As a consequence of this unique setting, these natural geographic barriers have both constrained and shaped urban development over the years.

As noted above, the visual character throughout the District does vary, depending on the location within the Los Angeles metropolitan region. For example, much of the inland valleys such as the San Fernando, San Gabriel, and Santa Clarita Valleys are largely suburban regions situated in a flat sedimentary basins flanked by mountains. These areas experienced substantial growth (i.e., “booms”) following World War II, after which single and multiple-family residences were built on the remaining undeveloped land. With local exceptions due to intervening topographic features such as the Verdugo Mountains, San Rafael Hills, etc., the visual character of these valleys is relatively flat with a pattern of roadways and development that is regular, and often, orthogonal.

Buildings in the valley areas tend to be low in height, predominantly one- to three-story structures. Major arterials are often flanked by low- to medium-density commercial development interspersed with multi-family apartments. In the areas between arterial streets, narrower residential streets allow for low- to medium-density neighborhoods generally composed of detached, single-family residences. Pockets of industrial land use in

5. Environmental Analysis AESTHETICS

these valley areas range from small, light industrial properties such as gas stations, auto body shops, and small machining/manufacturing operations, to large-scale plants such as the Lockheed aerospace plant and the Warner Brothers and Disney film and animation studios in the San Fernando Valley.

Unlike the suburban valleys described above, there is no single predominant development pattern in the area extending south and west from downtown Los Angeles. The area's land uses are particularly diverse, embracing heavy manufacturing plants that were once operated by large companies such as Alcoa Aluminum, Goodyear Tire and Rubber, and Bethlehem Steel. This area also includes large tracts of medium-density housing, and like the valleys, much of the housing stock was built in the aftermath of World War II.

Downtown Los Angeles is highly urbanized, featuring a blend of commercial, light and heavy industry, and skyscraper/office land uses. Home to the tallest building in the western U.S., the urban nature of downtown Los Angeles represents a regional aesthetic resource, with a distinctive skyline that is widely visible throughout the region. Transportation infrastructure also influences the visual character of this area. Los Angeles International Airport (LAX) is readily recognized due to its distinctive architecture and heavy air traffic (i.e., reportedly the sixth-busiest airport in the world).

The visual character of the southernmost part of the District is heavily influenced by the Long Beach and Los Angeles Harbors, the busiest port of entry in the U.S. Similarly, this area also houses more than a dozen oil refineries and terminals. Urban single- and multi-family land use is also widespread, and it is generally interspersed with these industrial and shipping land uses.

Visual Resources

Historically, development in the City of Los Angeles and surrounding urban and suburban areas has encroached on many natural aesthetic resources, such as undeveloped open space. Such development notwithstanding, the area still possesses many widely recognized visual resources, also referred to as scenic vistas and aesthetic features. Table 5.1-2 lists some of the most noteworthy vistas and features throughout the area. They include natural visual resources, such as nearby beaches, parks, national forests, and recreation areas, as well as distinctive resources in the built environment, such as the downtown Los Angeles skyline, Los Angeles City Hall, the Griffith Park Observatory, and the Point Fermin Lighthouse.

Landforms

The natural landforms that are found in the District are almost unmatched for diversity in an urban setting, including rugged mountains whose elevations locally exceed 10,000 feet; expansive, sandy beaches; coastal headlands; sediment-filled inland valleys, some of which are more than 25 miles long; and a broad coastal plain that is typified by low elevations and nearly flat topography.

Mountain Ranges

Los Angeles County includes several mountain ranges, the most prominent of which are the San Gabriel Mountains, Santa Monica Mountains, Santa Susana Mountains, and the Verdugo Mountains. The largest of these ranges, the San Gabriel Mountains, includes Mount San Antonio, commonly referred to as Mt. Baldy, which tops out at just over ten thousand feet and can be seen from much of the southern part of the County.

5. Environmental Analysis

AESTHETICS

Inland Valleys

The District includes several prominent inland valleys, all of which are underlain by sedimentary basins. Sediment sources are tied to regional tectonic deformation and uplift that results in sediment erosion in mountain areas, followed by alluvial transport and ultimate deposition in the neighboring valleys.

The Los Angeles Coastal Plain

The Los Angeles Basin is a sedimentary basin flanked by mountains to the north and northeast, and the Pacific Ocean to the west and south. Topographically, the basin is manifest as a broad coastal plain marked by low elevations and nearly flat relief. Such a setting is amenable to many types of development, which contributed to the City of Los Angeles' current role as a commercial, governmental, and visual focal point of the region.

Coastline

The coastline of Los Angeles is widely recognized, comprising a distinctive part of the area's visual landscape. Moreover, there is a significant variety in the coastal landforms, ranging from expansive, sandy beaches to rugged, cliff-bound headlands.

Scenic Vistas and Corridors

The District is traversed by a number of scenic highways and corridors that are judged to possess substantial aesthetic value. A few of the highways within the area have been officially designated as scenic under the California Scenic Highway Program, although several are considered eligible for such designation.⁹ Table 5.1-1 lists scenic highways, byways, routes, and corridors within the SUP area. In designating scenic highways, Caltrans considers the following criteria: 1) the scenic highway should be part of a memorable landscape that showcases the natural scenic beauty or agriculture of California; 2) visual intrusions do not significantly impact the scenic corridor; 3) evidence of strong local support for the proposed designation; and 4) length not less than a mile and not segmented.¹⁰ In the Scenic Highway Element of the adopted 1980 Los Angeles County General Plan, the County also distinguishes between highways that are officially designated scenic, highways that should be given first priority in scenic designation, and highways that should be given second priority in scenic designation.¹¹

In addition to the scenic highways and corridors discussed above, the District also embraces many other scenic vistas and aesthetic features, some of which are man-made, such as distinctive or historic buildings like Los Angeles City Hall, Union Station, or the Watts Towers, and some of which reflect natural, largely undisturbed settings such as Griffith Park, the Angeles National Forest, or the Santa Monica Mountains National Recreational Area. Table 5.1-2 lists some of the most distinctive and well-known scenic vistas and aesthetic features in the District.

⁹ _California Department of Transportation (Caltrans), 2014. California Scenic Highway Program, http://www.dot.ca.gov/hq/LandArch/scenic_highways/index.htm, accessed on March 10, 2014.

¹⁰ Caltrans, 2008. Scenic Highway Guidelines, Landscape Architecture Program, October 2008.

¹¹ _County of Los Angeles, 1980. Adopted General Plan, Scenic Highway Element.

5. Environmental Analysis AESTHETICS

Table 5.1-2 Select Scenic Vistas and Aesthetic Features

Aesthetic Resource	Description
Angel's Gate Lighthouse	Architecturally unique among California lighthouses, Angel's Gate is at the entrance to Los Angeles Harbor.
Angeles National Forest	This 650,000-acre National Forest provides aesthetic value, recreational opportunities, and watershed protection.
Balboa Park and Sepulveda Dam Recreation Area	This relatively flat, open space in the San Fernando Valley provides a sharp visual break from the surrounding developed commercial/residential areas.
Baldwin Hills	Nearly 450 acres of protected park, including the Kenneth Hahn State Recreation Area.
Beaches	Beaches flank the west side of the District, including the Los Angeles communities of Pacific Palisades, Venice, Playa del Rey, and Westchester.
City Hall	Once the tallest building in the City, its distinctive architecture was designed by John C. Austin in 1928.
Dodger Stadium	The famous 52 year-old stadium features well-known views of downtown Los Angeles and the San Gabriel Mountains.
Downtown Los Angeles Skyline	Visible from many parts of the Valley area, this cityscape combines urban skyscrapers, mountains, and palm trees.
El Pueblo de Los Angeles (Olvera Street)	Historical site preserving the origins of Los Angeles and containing Olvera Street, Los Angeles's first street, and the Avila Adobe, the oldest remaining residence in Los Angeles.
Elysian Park	At 600 acres, the second largest city park in the city, including hiking trails, picnic areas, a man-made lake, and children's play area.
Griffith Park and Observatory	Covering more than 4,107 acres, Griffith Park is the largest municipal park and urban wilderness area in the US. The Observatory, recently renovated in 2005, is located on Mount Hollywood with panoramic views of the Los Angeles Basin and the Hollywood Hills.
Hollywood Sign	Famous sign atop Mount Lee in the Hollywood Hills, northwest of downtown Los Angeles.
J. Paul Getty Center	Art museum renowned for its architecture as well as collections.
La Brea Tar Pits (G. Page Museum)	Contain fossils of Pleistocene mammals, including dire wolves, sabre-toothed cats, and mammoths.
Los Encinos State Historic Park	Historic site with archeological significance, including over one million artifacts. The park also contains exhibits on early California ranch life.
Marina del Rey Boat Marina	Marina del Rey is the largest manmade small-boat harbor in the world and home to over 6,000 pleasure boats and yachts.
Point Fermin Lighthouse	One of San Pedro's most recognized landmarks, with a Victorian-style building and flower gardens.
Port of Los Angeles	One of the largest and busiest seaports in the world; 20 miles south of downtown Los Angeles, it occupies 7,500 acres along 43 miles of coast.
San Gabriel Mountains	In addition to numerous recreational opportunities, this mountain range provides the Valley with a strong visual backdrop to the north, with elevations locally exceeding 10,000 feet above sea level.
Santa Monica Mountains National Recreational Area	This 150,000-acre National Recreation Area includes a number of aesthetic features visible along the south side of the San Fernando Valley. Other areas of scenic value include Stunt Ranch, Topanga Canyon, Stone Canyon Reservoir, and Will Rogers State Historic Park.
Topanga State Park	This park in the Santa Monica Mountains features 36 miles of trails through open grassland, live oaks, and spectacular views of the Pacific Ocean. Considered the world's largest wildland within the boundaries of a major city. Also a geological resource, since the park contains earthquake faults, marine fossils, volcanic intrusions, and various sedimentary formations.
Union Station	Los Angeles' first train depot remains a vital, multi-modal transportation hub. Architecturally distinctive design by Parkinson and Parkinson, the building is on the National Register of Historic Places.

5. Environmental Analysis

AESTHETICS

Table 5.1-2 Select Scenic Vistas and Aesthetic Features

Aesthetic Resource	Description
Watts Towers	Distinctive pair of steel towers built by Simon Rodia and decorated with scrap metal, bed frames, bottles, ceramic tiles, and seashells. The towers are on the National Register of Historic Places.
Wilacre Park	Located in the Eastern Santa Monica Mountains above Studio City, Wilacre Park has 128 acres of wooded trails and canyons.
Wilson Canyon Park	Located at the northern edge of the San Fernando Valley, this 242-acre park includes oak groves and woodlands, a year-round stream, scenic vistas, and extensive trails leading into the Angeles National Forest.

Source: California Environmental Resources Evaluation System (CERES), 2013. Los Angeles Urban Area Imagery, sourced from the National Geospatial-Intelligence Agency (NGA), dated June 20, 2013.

Note: This table is not all-inclusive. It lists some of the most distinctive scenic vistas/aesthetic features in the District.

Unique Aesthetic Resources

LAUSD is the second largest public school system in the United States and encompasses nearly 800 campuses distributed across more than 700 miles. Since its founding in 1872, the district has commissioned, designed, and acquired a remarkable collection of buildings, campuses, and facilities. These properties reflect more than a century of social, architectural, and technological advances, as well as ongoing educational and curricular reform. Properties range from a few late-nineteenth-century, wood-framed schoolhouses to mid-twentieth-century superblock campuses exemplary of modernist architectural design. Unique aesthetic features can be found on District schools with the following architectural styles.

- Late-Nineteenth-Century Victorian Era Styles
- Early Twentieth Century: Beaux-Arts Classicism and Neo-Classical Revival
- Early Twentieth Century: Indigenous Revival Styles and Historic Eclecticism
- Mission Revival and Spanish Colonial Revival
- Renaissance Revival Style
- Gothic Revival / Collegiate Gothic
- Art Deco
- Streamline Moderne | Moderne
- PWA Moderne
- Early Modernism | International Style
- Mid-Century Modernism / Regional Modernism

Many schools are considered historically significant, meeting the listing criteria for the National Register of Historic Places or the California Register of Historical Resources. A number of the schools are directly associated with the distinguished southern California architects, who include but are not limited to: John C. Austin, George Edwin Bergstrom, Stiles O. Clements, Myron Hunt, Gordon Kaufmann, Richard Neutra, Charles F. Plummer, and Alfred Rosenheim.

5. Environmental Analysis AESTHETICS

Based on a 2002 District-wide survey and the 2014 update, a list of the most historically and architecturally significant school buildings was developed (refer to Chapter 5.5 Cultural Resources).

5.1.2 Thresholds of Significance

In accordance with CEQA Guidelines Appendix G a project would normally have a significant effect on the environment if the project would:

- AE-1 Have a substantial adverse effect on a scenic vista.
- AE-2 Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway.
- AE-3 Substantially degrade the existing visual character or quality of the site and its surroundings.
- AE-4 Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area.

5.1.3 Environmental Impacts

The applicable thresholds are identified in brackets after the impact statement.

Impact 5.1-1: SUP-related projects would not have a substantial adverse effect on scenic vistas. [Threshold AE-1]

All SUP Projects

As a rule, existing, established public schools tend to be aesthetically compatible with the neighborhoods in which they are located, and their scope, height, and mass are unlikely to block, obscure, or degrade surrounding views. This pattern notwithstanding, the potential for SUP implementation to adversely impact one or more of the scenic vistas and aesthetic features in Table 5.1-2 deserves consideration. From the perspective of natural views, such as views of surrounding mountains, parks, and shorelines in the greater Los Angeles area, most of existing and newly built schools are one or two-stories in height. Additions to or modifications of these school buildings may add another story or a side addition that may block existing scenic views. Each SUP-related project would be assessed on a case-by-case basis. LAUSD's site-specific review process for upgraded or new school construction projects ~~would incorporate under~~ LAUSD ~~SC-PDF~~ AE-2-3 ~~which~~ requires analysis of views. The District is required to consider whether or not a proposed project is consistent with the general character of the surrounding neighborhood, including any proposed changes to the density, height, bulk, and setback of new or updated buildings.

Furthermore, the District is required to include unique vistas, natural areas, or scenic areas that have been formally recognized in the project vicinity and to consider whether the project would have an adverse aesthetic effect on these resources. School construction in neighborhoods that exhibit cohesive and pervasive aesthetic qualities, such as a distinctive architectural style, would be designed to comply with those aesthetic

5. Environmental Analysis

AESTHETICS

values. In some instances, school upgrade/modernization projects could enhance the view amenities and aesthetic properties of a given neighborhood, especially where the neighboring properties do not meet building codes and/or are dilapidated.

Certain policies in the Conservation Element of the City of Los Angeles General Plan have a comparable protective effect, wherein property developers are encouraged to retain significant existing landforms (e.g., ridgelines, bluffs, unique geologic features) and unique scenic features (e.g., mountains) and to protect the public's ability to view these scenic features.

For SUP-related site-specific projects ~~within the Coastal Zone implemented under the SUP~~ that may be in a State-recognized Coastal Zone, protection of scenic vistas is required by various provisions of the California Coastal Act. The act states, "The scenic and visual qualities of coastal areas shall be considered and protected as a resource of public importance. Permitted development shall be sited and designed to protect views to and along the ocean and scenic coastal areas, to minimize the alteration of natural land forms, to be visually compatible with the character of surrounding areas, and, where feasible, to restore and enhance visual quality in visually degraded areas."

For any site-specific projects implemented under the SUP that requires site grading or new building construction or exterior modification, the District will incorporate California Coastal Act requirements along with LAUSD School ~~SC-AE-3 Design Guide~~ into the site design and construction for protection of unique scenic features and designated scenic vistas. Scenic vista impacts would be less than significant.

Impact 5.1-2: SUP-related projects would not alter scenic resources within a state scenic highway. [Threshold AE-2]

All SUP Projects

State-designated scenic highways, highways with scenic priority identified in the L.A. County General Plan, nationally designated Scenic Byway Historic Parkways, and California Historic Parkway or those highways that could be so designated are listed in Table 5.1-1. Very few existing schools are near these scenic highways (specifically along the I-210, I-5, and Pacific Coast Highway, among others), and opportunities for new school construction and/or significant school building expansion are limited in most instances.

Many of the listed highways are high-volume, limited-access freeways with well-established and demarked landscaped or engineered margins (including sound walls/barriers), or scenic highways in sparsely populated mountain areas where the surrounding terrain is often typified by very steep slopes. CDE Title 5 criteria governing school project siting within 500 feet of a major transportation thoroughfare would also reduce the likelihood of a school upgrade or modernization project being undertaken near a scenic highway.

Additional protection of scenic resources near a state scenic highway are included in the California Scenic Highway Program, where the sponsoring city or county must also adopt ordinances, zoning, and/or planning policies to preserve the scenic quality of the corridor. Such ordinances and policies often constitute a formal Corridor Protection Program.

5. Environmental Analysis AESTHETICS

For any site-specific projects implemented under the SUP that requires site grading or building construction or exterior modification, the District will incorporate LAUSD ~~SC-AE-3~~~~School Design Guide~~ into the site design and construction for protection of scenic resources. Impacts to scenic resources within a state scenic highway would be less than significant.

Impact 5.1-3: SUP-related projects would not substantially degrade the existing visual character or quality of the site and its surroundings. [Threshold AE-3]

All SUP Projects

In some cases implementation of the SUP potentially could bring about adverse impacts on the existing visual character or quality of the site and its surroundings. For example, the architecture associated with a school construction project might be incompatible with a neighborhood that possessed a distinctive, widely appreciated architectural style or visual quality. Similarly, where an existing school building or buildings possess unique visual qualities, as in the case of certain older LAUSD school buildings designed by leading architects of their era, poorly conceived building additions or new structures could have an adverse impact on the visual character or quality of the site.

LAUSD ~~School Design Guide~~SC-AE-1 requires the consideration of architectural appearance/consistency and other aesthetic factors during the preliminary design review for a proposed school upgrade project. For construction of new buildings SC-AE-1 requires that architectural quality consider compatibility with the surrounding community. Under SC-AE-1 for historic resources, The District encourages the reuse rather than destruction of historical resources is the preferred method, with the multiple goals of: 1) retaining and preserving the historic character of a building, structure, or site; treating distinctive architectural features or examples of skilled craftsmanship with sensitivity; concealing reinforcement required for structural stability or life, safety, or mechanical systems; and conducting surface cleaning of historic structures by the gentlest means possible.

LAUSD ~~SC-PDF-AE-2-3~~ would also help minimize the likelihood of degraded visual character or quality during SUP implementation. ~~SC-PDF-AE-2-3~~ requires appropriate design changes to reduce or eliminate significant adverse aesthetic impacts resulting from a proposed school project's building or site design. These design changes could include, but are not necessarily limited to, changes to campus layout, height of buildings, and/or architectural style of buildings.

Compliance with LAUSD ~~SC-AE 5~~~~OEHS CEQA Specification Manual~~ would ensure shade and shadow impacts are analyzed and mitigated. A shadow analysis is required to determine whether a proposed project "would substantially degrade the existing visual character of the site or its surroundings."

For any site-specific projects implemented under the SUP, the District will incorporate LAUSD ~~School Design Guide, OEHS CEQA Specification Manual, SC-PDF-AE-2-1, SC-AE-2, SC-AE-3, SC-AE-5~~ into site-specific projects for protection of character and quality of site surroundings. Impacts to visual character or quality of the site and its surroundings would be less than significant.

5. Environmental Analysis

AESTHETICS

Impact 5.1-4: SUP-related projects would not generate substantial light or glare which would adversely affect day or nighttime views. [Threshold AE-4]

All SUP Projects

Depending on site-specific factors and conditions, new light sources could be associated with a future school upgrade project. Examples of such new light sources include campus marquees, parking lot or pedestrian walkway lights, crosswalk lights, building and courtyard lighting, and lighting associated with athletic fields or related athletic infrastructure (tennis courts, outdoor pools, etc.). The construction and operation of new features like these could result in adverse light and glare impacts on nearby land uses, most notably, single- or multi-family residences. During site-specific environmental review of future proposed school upgrade or modernization projects, the District will be obliged to consider whether the project will result in significant adverse light and glare impacts or not. Similarly, these new projects would be required to conform to existing District policies concerning school marquees and related potential for light and glare impacts.

LAUSD ~~Bulletin BUL-5004.1~~SC-AE-4 includes requirements that are intended to minimize adverse light and glare impacts on nearby properties. The SC-AE-4 Marquee Signs Bulletin BUL 5004.1, Bulletin which was revised in May 2010, includes detailed criteria for the design, approval, placement, and operation and maintenance of electronic light boards (i.e. marquees) proposed for any LAUSD school site. The LAUSD SC-AE-6 and SC-AE-7 School Design Guide provides measures such as eliminate direct-beam projection off-site or glare off buildings into adjoining residential areas, install lighting to minimize glare for pedestrians and drivers, and to avoid light spilling onto adjacent properties.

~~PDF SC-AE-4-7~~ provides quantitative performance standards for light and glare impacts to no more than two foot-candles, as measured at the property line of an affected nearby residence. The use of light hoods, filtering louvers, glare shields, and/or landscaping is discussed, as is painting of lamp enclosures and poles to reduce reflection. ~~SC-PDF-AE-3-8~~ includes site lighting standards that would have minimal impact off-site and minimal contribution to sky glow, glare, and light trespass.

The California Building Code~~CBC~~ also contains standards for outdoor lighting that are intended to reduce light pollution and glare by regulating light power and brightness, shielding, and sensor controls.

Impacts from substantial light and glare would be less than significant.

5.1.4 Applicable Regulations and Standard Conditions

State

- California Streets and Highways Code, Sections 260 through 263
- California Public Resources Code, Division 20
- California Code of Regulations, Title 24, Part 2
- California Code of Regulations, Title 5, Section 14010

5. Environmental Analysis AESTHETICS

Local

- City and County of Los Angeles General Plan: scenic corridors

LAUSD Standard Conditions of Approval

- ~~SC-AE-1 through SC-AE-8 School Design Guide. Los Angeles Unified School District. January 2014.~~
- ~~Marquee Signs (outdoor sign with electronic message display). BUL 5004.1 adopted May 25, 2010.~~
- ~~LAUSD OEHS CEQA Specification Manual, Appendix F, Protocol For Shadow Analysis In CEQA Documents For Proposed School Sites. December 2005, Revised June 2007.~~
- ~~Project Design Features: PDF AE-1, PDF AE-2, and PDF AE-3.~~

5.1.5 Level of Significance Before Mitigation

Upon implementation of regulatory requirements and LAUSD ~~Standards~~ Standard Conditions ~~listed above~~, the following impacts would be less than significant: 5.1-1, 5.1-2, 5.1-3, and 5.1-4.

5.1.6 Mitigation Measures

No mitigation measures are required.

5.1.7 Level of Significance After Mitigation

Impacts would be less than significant.

5. Environmental Analysis

AESTHETICS

This page intentionally left blank.

5. Environmental Analysis

5.2 AGRICULTURE AND FORESTRY RESOURCES

This section of the program EIR evaluates the potential for implementation of the SUP to impact agriculture and forest resources in the District. The section discusses plans and policies from several jurisdictional agencies, the existing agricultural resources throughout the SUP area, and possible environmental impacts that may occur during future phases of the SUP and site-specific projects implemented under the SUP.

TERMINOLOGY

California Department of Conservation Farmland Mapping and Monitoring Program (FMMP):¹

Prime Farmland (P). Farmland with the best combination of physical and chemical features and able to sustain long-term agricultural production. This land has the soil quality, growing season, and moisture supply needed to produce sustained high yields. Land must have been used for irrigated agricultural production at some time during the four years prior to the mapping date.

Farmland of Statewide Importance (S). Farmland similar to Prime Farmland but with minor shortcomings, such as greater slopes or less ability to store soil moisture. Land must have been used for irrigated agricultural production at some time during the four years prior to the mapping date.

Unique Farmland (U). Farmland of lesser-quality soils used for the production of the state's leading agricultural crops. This land is usually irrigated, but may include non-irrigated orchards or vineyards, as found in some climatic zones in California. Land must have been cultivated at some time during the four years prior to the mapping date.

Farmland of Local Importance (L). Land of importance to the local agricultural economy as determined by each county's board of supervisors and a local advisory committee. In some counties, Confined Animal Agriculture facilities are part of Farmland of Local Importance, but they are shown separately.

Grazing Land (G). Land on which the existing vegetation is suited to the grazing of livestock. This category was developed in cooperation with the California Cattlemen's Association, University of California Cooperative Extension, and other groups interested in the extent of grazing activities.

Other Land (X). Land not included in any other mapping category. Common examples include low density rural developments; brush, timber, wetland, and riparian areas not suitable for livestock grazing; confined livestock, poultry or aquaculture facilities; strip mines, borrow pits; and water bodies smaller than forty acres. Vacant and nonagricultural land surrounded on all sides by urban development and greater than 40 acres is mapped as Other Land.

The Rural Land Mapping Project provides more detail on the distribution of various land uses within the Other Land category in nine FMMP counties, including all eight San Joaquin Valley counties. The project may be expanded to the entire FMMP survey area as funding becomes available. The Rural Land categories include:

¹ Department of Conservation. Important Farmland Categories. http://www.conservation.ca.gov/dlrp/fmmp/mccu/Pages/map_categories.aspx.

5. Environmental Analysis

AGRICULTURE AND FORESTRY RESOURCES

- Rural Residential Land (R)
- Semi-Agricultural and Rural Commercial Land (sAC)
- Vacant or Disturbed Land (V)
- Confined Animal Agriculture (Cl): status of this land use relative to Farmland of Local Importance.
- Nonagricultural or Natural Vegetation (nv)

Water (W). Perennial water bodies with an extent of at least 40 acres.

Optional Designation. Land Committed to Nonagricultural Use. This category was developed in cooperation with local government planning departments and county boards of supervisors during the public workshop phase of the FMMP's development in 1982. Land Committed to Nonagricultural Use information is available both statistically and as an overlay to the important farmland information. Land Committed to Nonagricultural Use is defined as existing farmland, grazing land, and vacant areas which have a permanent commitment for development.

Forest land is defined as "land that can support 10-percent native tree cover of any species, including hardwoods, under natural conditions, and that allows for management of one or more forest resources, including timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, and other public benefits".²

Timberland is defined as "land...which is available for, and capable of, growing a crop of trees of any commercial species used to produce lumber and other forest products, including Christmas trees".³

Timberland production zone is defined as an area which has been zoned pursuant to Section 51112 or 51113 and is devoted to and used for growing and harvesting timber, or for growing and harvesting timber and compatible uses. Compatible uses include management for watershed; management for fish and wildlife habitat or hunting and fishing; a use integrally related to the growing, harvesting and processing of forest products, including but not limited to roads, log landings, and log storage areas; the erection, construction, alteration, or maintenance of gas, electric, water, or communication transmission facilities; grazing; and a residence or other structure necessary for the management of land zoned as timberland production.⁴

Timber is trees grown for forest products requiring the harvesting of trees, such as wood for construction and carpentry, and wood pulp used in making paper and corrugated board (cardboard).

5.2.1 Environmental Setting

5.2.1.1 REGULATORY FRAMEWORK

State laws and regulations are summarized below. The following regulatory framework discussion does not include all plans and policies that relate to agriculture and forestry resources in the District. Although some

² California Public Resources Code Section 12220(g).

³ California Public Resources Code Section 4526.

⁴ California Government Code Sections 51104(g) and 51104(h).

5. Environmental Analysis AGRICULTURE AND FORESTRY RESOURCES

of these may not directly applicable to the SUP or site-specific projects implemented under the SUP, they are included to assist in identifying potential impacts and significance thresholds. See *Applicable Regulations and Standard Conditions* at end of this chapter for those that require District compliance.

State

California Government Code, Section 65570

The California Department of Conservation (DOC) established the Farmland Mapping and Monitoring Program (FMMP [see below]) in 1982 to identify critical agricultural lands and track the conversion of these lands to other uses. The FMMP is a nonregulatory program and provides a consistent and impartial analysis of agricultural land use and land use changes throughout California.

County, state, and federal agencies have established several classifications of important agricultural land based on factors such as soil characteristics, climate, and water supply (see “Terminology,” above); categories of mapped agricultural land are set forth in California Public Resources Code Section 21060.1.⁵

Through the Important Farmland maps and related databases, DOC maintains an ongoing inventory of farmland and projects that convert farmland to urban and other uses.^{6,7} DOC tracks the status of farmlands through the following procedures:

- Maps and statistics are produced biannually using a process that integrates infrared aerial photos provided by NASA, standard aerial photos, field mapping, a computerized mapping system, and public review.
- Maps compile soil survey and current land use information from the USDA and Natural Resource Conservation Service to represent an inventory of agricultural resources within each county.
- Based on these maps, DOC evaluates land to determine its farmland designation, and flags fallow parcels.
- In order to qualify as Prime Farmland rather than just prime soil, the land must have irrigation as well as prime soil attributes.
- DOC has a minimum mapping unit of 10 acres, with parcels smaller than 10-acres being absorbed into the surrounding classifications.

Once DOC designates land as prime farmland, local governments may limit the use of this land to agriculture or similar types of open space.

⁵ Division of Land Resource Protection (DLRP). 2004. A Guide to the Farmland Mapping and Monitoring Program. http://www.conservation.ca.gov/dlrp/fmmp/Documents/fmmp_guide_2004.pdf.

⁶ Division of Land Resource Protection (DLRP). 2004. A Guide to the Farmland Mapping and Monitoring Program. http://www.conservation.ca.gov/dlrp/fmmp/Documents/fmmp_guide_2004.pdf.

⁷ 2006-2008 California Farmland Conversion Report. http://www.conservation.ca.gov/dlrp/fmmp/pubs/2006-2008/Pages/FMMP_2006-2008_FCR.aspx.

5. Environmental Analysis

AGRICULTURE AND FORESTRY RESOURCES

Senate Bill 850

Land Evaluation and Site Assessment Law (LESA) is an approach for rating the relative quality of land resources based on specific measurable features. The formulation of a California Agricultural LESA Model is the result of Senate Bill 850 (Chapter 812/1993), which charges the Resources Agency, in consultation with the Governor’s Office of Planning and Research, with developing an amendment to Appendix G of the California Environmental Quality Act (CEQA) Guidelines concerning agricultural lands.⁸ Such an amendment is intended “to provide lead agencies with an optional methodology to ensure that significant effects on the environment of agricultural land conversions are quantitatively and consistently considered in the environmental review process.” Appendix G of the CEQA Guidelines states that “in determining whether impacts to agricultural resources are significant, lead agencies may refer to the California LESA Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland.”

The California LESA Model is based on a 100-point scale. The LESA score has two parts, the Land Evaluation (LE) Factors score, which rates the soil in relation to agriculture, and the Site Assessment (SA) Factors score, which rates all remaining factors as they pertain to agriculture. A detailed LESA analysis is not practicable at the scale of the District. However, methods and criteria from the LESA Model are used where applicable, and discussed qualitatively, in the impacts analysis in this Section.

California Government Code Sections 51200 et seq.

The **California Land Conservation Act**—commonly referred to as the **Williamson Act**—was adopted initially by the State of California in 1965.⁹ The act was established to encourage the preservation of agricultural lands in view of the increasing trend toward their “premature and unnecessary” urbanization. The act enables counties and cities to designate agricultural preserves (Williamson Act lands) and offer preferential taxation to agricultural landowners based on the income-producing value. In return for the preferential tax rate, the landowner is required to sign a contract with the county or city agreeing not to develop the land for a minimum of 10 years. The contract is renewed automatically on its anniversary date unless a notice of nonrenewal or petition for cancellation is filed.¹⁰ Partial replacement of local property tax revenue by the state, termed Open Space Subventions, were eliminated from the state budget for fiscal year 2012; however, existing Williamson Act contracts remain in effect.¹¹

⁸ Chapter 812, Statutes of 1993; California Public Resources Code, Section 21095.

⁹ California Government Code Sections 51200 et. seq.

¹⁰ Division of Land Resource Protection (DLRP). 2013, October. The California Land Conservation Act 2012 Status Report. http://www.consrv.ca.gov/dlrp/lca/stats_reports/Documents/2012%20WA%20Status%20Report.pdf.

¹¹ Division of Land Resource Protection (DLRP). 2013, October. The California Land Conservation Act 2012 Status Report. http://www.consrv.ca.gov/dlrp/lca/stats_reports/Documents/2012%20WA%20Status%20Report.pdf.

5. Environmental Analysis

AGRICULTURE AND FORESTRY RESOURCES

California Government Code Sections 53094(b) and 65402(b)

Even where schools are not permitted or are conditionally permitted under local land use law, school districts ultimately have the authority to render general plan and zoning requirements inapplicable.¹² If the local agency disapproves the location, purpose, or extent of the school use as being not in conformity with the general plan, the school district may nonetheless overrule the disapproval.¹³ A school district's governing body may render a local agency's general plan or zoning ordinance inapplicable by a two-thirds vote.¹⁴ The school district's governing body must notify the affected city or county of such an action within 10 days of the action. This vote may be taken at any point in the process. Thus, under State law, the fact that a proposed LAUSD school project is inconsistent with a local general plan or zoning ordinance will not necessarily prevent LAUSD from proceeding with that project.

5.2.1.2 EXISTING CONDITIONS

Regional Setting

Agriculture in Los Angeles County

The total dollar value of agricultural production in Los Angeles County in 2012 was \$189.9 million. The top five agricultural commodities by dollar value in 2012 were nursery production, vegetable crops, field crops, fruit and nut crops, and livestock production. The total acreage in agricultural production was 21,563 acres, or about 33.7 square miles.¹⁵ Most mapped important farmland in Los Angeles County is outside of the District in the northern part of the county—in the Antelope Valley, part of the Mojave Desert.¹⁶ Los Angeles County produced the greatest agricultural production of any county in the United States from 1910 to about 1955.¹⁷

District Setting

Mapped Farmland

Most of the District is urbanized and is not mapped on the California Important Farmland Finder (CIFF) maintained by the FMMP.¹⁸ However, the west half of the San Fernando Valley, and part of the northern San Fernando Valley, are mapped on the CIFF. Several small areas of prime farmland are scattered around the San Fernando Valley. The total amount of mapped important farmland in the District, approximately 465 acres (301 acres of Prime Farmland and 164 acres of Unique Farmland; see Figure 5.2-1, *Farmland Map*), is about 0.1 percent of the District's total area. Nearly all of the Prime Farmland in the District is in five areas:

¹² Government Code Sections 53094 and 65402

¹³ Government Code Section 65402 (c)

¹⁴ Government Code Section 53094; 82 Op. Atty. Gen. 135 (1999)

¹⁵ Agricultural Commissioner/Weights and Measures, Los Angeles County (ACWM). 2013, October. Los Angeles County Crop and Livestock Report: 2012. <http://acwm.lacounty.gov/pdf/Crop2012.pdf>.

¹⁶ Division of Land Resource Protection (DLRP). California Important Farmland Finder. <http://maps.conservation.ca.gov/ciff/ciff.html>.

¹⁷ Surls, Rachel (Sustainable Food Systems Advisor). 2011, February 11. University of California Cooperative Extension Los Angeles County. Social Focus. Kcet.org. http://www.kcet.org/updaily/social_focus/history/bringing-back-urban-agriculture-to-la-communities-30290.html.

¹⁸ Division of Land Resource Protection (DLRP). California Important Farmland Finder. <http://maps.conservation.ca.gov/ciff/ciff.html>.

5. Environmental Analysis

AGRICULTURE AND FORESTRY RESOURCES

Sepulveda Dam Recreation Area; the campus of Los Angeles Pierce College, a community college; the north end of the Van Nuys Airport property; Orcutt Ranch Horticultural Center, a Los Angeles City Park; and Forneris Farms, a fruit and vegetable growing operation. All five locations are in the City of Los Angeles in the San Fernando Valley. Most of the Unique Farmland in the District is in transmission line easements in the City of Los Angeles in the San Fernando Valley.¹⁹

Williamson Act Contracts

There are no Williamson Act Contracts that affect land in the District; the only Williamson Act contracts in Los Angeles County are on Santa Catalina Island.²⁰

Agricultural Uses

Mapped important farmland in the District was checked using Google Earth satellite view in May 2013. Some of the areas showed parallel rows appearing to be row crop agriculture; some were bright green but without distinct rows, suggesting grass crop agriculture; and some appeared to be vacant land.

Some commercial agricultural uses may exist in the District outside of mapped important farmland. However, most of the District is in intensely urbanized areas, and it is thus unlikely that there are substantial areas in agricultural use in the District apart from mapped important farmland.

All LAUSD schools are developed as schools, even schools that are presently closed. Analysis of agricultural uses under CEQA focuses on impacts to commercial agricultural operations.²¹ Thus, while substantial numbers of LAUSD schools may contain small school gardens for educational purposes—comparable to community gardens—such school gardens are not considered agricultural uses for the purpose of CEQA analysis.

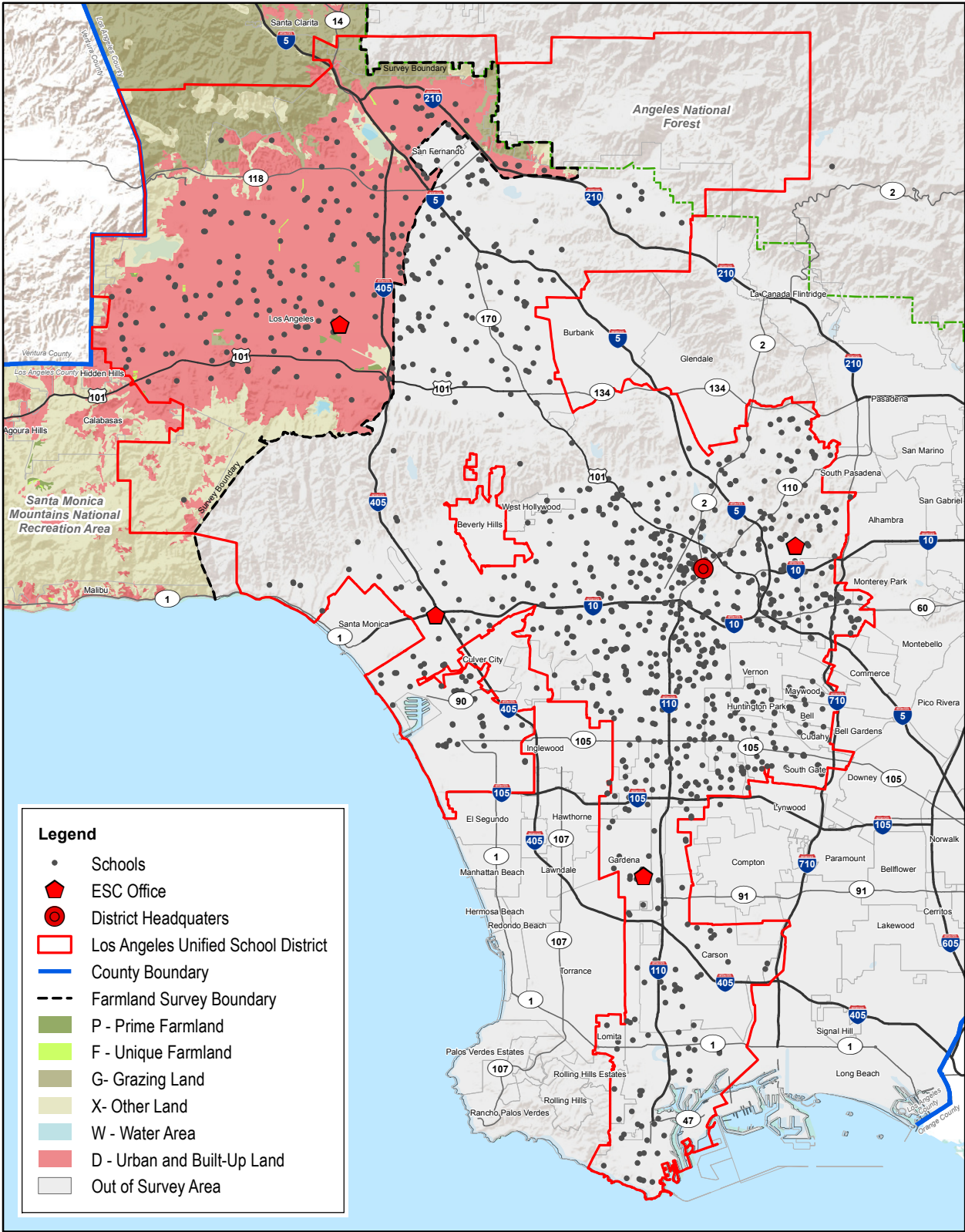
¹⁹ Division of Land Resource Protection (DLRP). California Important Farmland Finder. <http://maps.conservation.ca.gov/ciff/ciff.html>.

The Sepulveda Dam Recreation Area is at the northwest corner of the junction of the I-405 and US 101 freeways. Los Angeles Pierce College is along the south side of Victory Boulevard from Winnetka Avenue on the east to De Soto Avenue on the west. The referenced part of the Van Nuys Airport property is at the northeast corner of Roscoe Boulevard and Havenhurst Avenue. Orcutt Ranch Horticultural Center is at the southeast corner of Roscoe Boulevard and March Avenue. Forneris Farms is on the south side of Rinaldi Street straddling Alemany Way.

²⁰ Division of Land Resource Protection (DLRP). 2013. Los Angeles County Williamson Act FY 2012/2013. ftp://ftp.consrv.ca.gov/pub/dlrp/wa/LA_12_13_WA.pdf.

²¹ California Department of Conservation (CDC). 1997. California Agricultural Land Evaluation and Site Assessment Model: Instruction Manual. <http://www.consrv.ca.gov/dlrp/LESA/Documents/lesamodl.pdf>.

5. Environmental Analysis Figure 5.2-1 Mapped Farmland



Source: California Department of Conservation, 2010

5. Environmental Analysis

AGRICULTURE AND FORESTRY RESOURCES

This page intentionally left blank.

5. Environmental Analysis AGRICULTURE AND FORESTRY RESOURCES

Forest Land

There is no forest land on or next to existing LAUSD schools. Montane hardwood forest and/or woodland vegetation occurs in the San Gabriel Mountains. At lower elevations, montane hardwood overstory species typically include oaks, white alder, bigleaf maple, bigcone Douglas fir, and California laurel. Understory vegetation usually is dominated by chaparral species such as coffeeberry, manzanita, and ceanothus. A wide variety of wildlife relies on this habitat, including jays, woodpeckers, squirrel, black bear, mule deer, and various reptiles and amphibians.²² Coastal oak woodland occurs next to the north side of Topanga Elementary Charter School in the Community of Topanga in unincorporated Los Angeles County. Coastal oak woodland occurs on flat to steep slopes that often face northwest at low elevations—between 105 to 2,851 feet. It is dominated by coast live oak in the tree layer, with various species of shrubs and annual grassland in the understory.²³

5.2.2 Thresholds of Significance

CEQA THRESHOLDS

According to CEQA Guidelines Appendix G a project would normally have a significant effect on the environment if the project would:

- AG-1 Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use.
- AG-2 Conflict with existing zoning for agricultural use, or a Williamson Act contract.
- AG-3 Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g)).
- AG-4 Result in the loss of forest land or conversion of forest land to non-forest use.
- AG-5 Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use.

²² National Park Service (NPS). 2011, September. San Gabriel Watershed and Mountains: Special Resource Study and Environmental Assessment. <http://parkplanning.nps.gov/document.cfm?documentID=43639>.

²³ California State Parks. 2012, September 28. Topanga State Park General Plan and Environmental Impact Report. Chapter Two: Existing Conditions and Issues. <http://www.parks.ca.gov/pages/21299/files/02finalgp-ch2.pdf>.

5. Environmental Analysis

AGRICULTURE AND FORESTRY RESOURCES

5.2.3 Environmental Impacts

ANALYTIC METHODOLOGY

Locations of mapped important farmland were identified using the California Important Farmland Finder mapped by the Division of Land Resource Protection. Existing conditions on and surrounding mapped farmland were identified using Google Maps and Google Earth. Existing schools near mapped important farmland were identified using a geographic information systems (“GIS”) data layer from the District.

The applicable thresholds are identified in brackets after the impact statement.

Impact 5.2-1: The SUP would not result in conversion of mapped farmland to nonagricultural uses. [Threshold AG-1]

New Construction on New Properties

New construction on new properties would not directly convert mapped important farmland to school use. Four of the five locations of Prime Farmland are unavailable for development as a school: one is in a flood control basin (Sepulveda Dam Recreation Area); one is on a college campus (Los Angeles Pierce College); one is on an airport property and within the airport influence area for Van Nuys Airport; and the fourth, Orcutt Ranch Horticultural Center, in a Los Angeles city park. The fifth, Forneris Farms, is unsuitable for use as a school because an overhead electric transmission line passes over the east part of that site. Unique Farmland in the District is unsuitable for school use because most of it is both under electric transmission lines and in narrow strips, with length-to-width ratios impracticable for school use.

Therefore, any potential impact contributing to conversion of mapped important farmland to nonagricultural use would be an indirect impact of new or expanded schools being located near mapped farmland. All of the areas of mapped farmland described above are surrounded by intensively developed urbanized land uses. Existing agricultural operations in the District are already surrounded by land uses—residential, park, and school uses—that are sensitive to impacts from agricultural operations, such as pesticide use, dust, and noise. Development of any new or expanded school would require demolition and redevelopment of existing land uses. Considering the existing surroundings of important mapped farmland in the District, it is unlikely that development of a new or expanded school near such farmland would create new incompatibilities between agricultural use and future school use so severe as to force conversion of mapped farmland to nonagricultural uses. Conversion of farmland impacts would be less than significant.

New Construction and Modernization on Existing Campus

No farmland of statewide importance was identified within the District. Although there are areas designated prime farmland and unique farmland as mapped by the FMMP, these areas are not within existing LAUSD school campuses. Where existing schools are near mapped important farmland—for instance, three charter high schools, Birmingham Community Charter High School, High Tech Los Angeles, and Magnolia Science Academy 2 are about 300 feet north of Prime Farmland in the Sepulveda Dam Recreation Area—the analysis

5. Environmental Analysis AGRICULTURE AND FORESTRY RESOURCES

of indirect impacts to mapped farmland above would apply to projects on existing schools. Conversion of farmland impacts would be less than significant.

Impact 5.2-2: The SUP would not conflict with existing zoning for agricultural use or with land covered by an existing Williamson Act contract. [Threshold AG-2]

ZONING FOR AGRICULTURAL USE

New Construction on New Properties

Some new construction projects could be proposed for sites that are zoned agricultural but not in production. California school districts can exempt sites for schools including classrooms from local land use regulations pursuant to California Government Code Section 53094(b). Hazards from previously farmed land are discussed in Chapter 5.8 Hazards and Hazardous Materials. New or expanded school uses on new properties would not conflict with any existing agricultural zoning. Impacts would be less than significant.

New Construction and Modernization on Existing Campus

As all campuses where these types of projects would occur are existing uses, potential conflicts between zoning for those school sites and the existing school uses are not considered an adverse environmental impact.

As part of the SUP, the District plans to exempt all existing schools from local jurisdiction zoning regulations. Although most school property is owned by the District, the underlying city or county zoning can be residential, industrial, commercial, or agricultural. The California legislature granted school districts the power to exempt school property from county and city zoning requirements, provided the school district complies with the terms of Government Code Section 53094.²⁴ As lead agency, the District will comply with the criteria for implementation of the land use overrides to render the county and city zoning ordinance inapplicable to the properties. All existing schools not already exempt from local zoning would become exempt as part of the SUP.

WILLIAMSON ACT CONTRACTS

All SUP Projects

A school district is permitted to acquire Williamson Act land if requirements for public acquisition of the

²⁴ Government Code Section 53094.

- (a) Notwithstanding any other provision of this article, this article does not require a school district to comply with the zoning ordinances of a county or city unless the zoning ordinance makes provision for the location of public schools and unless the city or county has adopted a general plan.
- (b) Notwithstanding subdivision (a), the governing board of a school district, that has complied with the requirements of Section 65352.2 of this code and Section 21151.2 of the Public Resources Code, by a vote of two-thirds of its members, may render a city or county zoning ordinance inapplicable to a proposed use of property by the school district. The governing board of the school district may not take this action when the proposed use of the property by the school district is for nonclassroom facilities, including, but not limited to, warehouses, administrative buildings, and automotive storage and repair buildings.
- (c) The governing board of the school district shall, within 10 days, notify the city or county concerned of any action taken pursuant to subdivision (b).

5. Environmental Analysis

AGRICULTURE AND FORESTRY RESOURCES

land are met and the contract is terminated.²⁵ A “farmland security zone” contract is a different more restrictive type of Williamson Act contract. School districts are prohibited from taking farmland security zone lands for school facilities.²⁶ No Williamson Act or farmland security zone contracts are in effect for land within the District. Therefore, any project constructed under the SUP would not conflict with farmland preservation under a Williamson Act contract. No impact would occur.

Impact 5.2-3 The SUP would not conflict with zoning for forest land or timberland. [Thresholds AG-3]

New Construction on New Properties

Nearly all District schools are in urbanized neighborhoods. Thus, it is unlikely that expansions of existing schools would convert forest land to school use. Forest land and timberland would not provide ideal locations for neighborhood schools. Therefore, the District would not propose to acquire those lands. No forest land and timberland impact would occur.

New Construction and Modernization on Existing Campus

Existing District schools do not support forest land or timberland uses, and no impact would occur.

Impact 5.2-4 The SUP would not result in the loss of forest land or conversion of forest land to non-forest use. [Thresholds AG-4].

New Construction on New Properties

It is very unlikely that the District would choose to develop a school on forest land. Montane hardwood vegetation in the District is in the northeast corner of the District in the San Gabriel Mountains, several miles from the nearest residential neighborhoods generating demand for schools. No impact would occur.

New Construction and Modernization on Existing Campus

There are no existing District schools in parts of the District where forest land occurs. These projects would occur on existing schools and would not impact forest land. No impact would occur.

²⁵ Department of Conservation (Government Code §51291(b)). http://www.conservation.ca.gov/dlrp/lca/basic_contract_provisions/Pages/public_acquisitions.aspx

²⁶ Department of Conservation. Farmland Security Zones. http://www.conservation.ca.gov/dlrp/lca/farmland_security_zones/Pages/index.aspx

5. Environmental Analysis AGRICULTURE AND FORESTRY RESOURCES

Impact 5.2-5: SUP implementation would not involve other changes in the existing environment which could result in conversion of Farmland to nonagricultural use or conversion of forest land to non-forest use. [Threshold AG-5]

LAND USE COMPATIBILITY

All SUP Projects

Indirect impacts to mapped important farmland arising from land use incompatibilities would be less than significant, as substantiated above under Impact 5.2-1.

WATER USE

Increasing water demands in a region can reduce the practicality and/or economic feasibility of commercial agriculture.

New Construction on New Properties or Existing Campus

New construction projects could increase water demands through site-specific net increases in student capacity and other changes, such as developing additional landscaped areas or acquisition of school-adjacent parcels and new classroom construction. Implementation of the SUP would not increase District-wide enrollment. The SUP would accommodate forecast increases in enrollment due to projected increasing numbers of school-aged children as well as higher graduation rates; forecast trends in District enrollment are discussed in Chapter 4, *Program Description*. SUP implementation therefore would not increase total water consumption within the District beyond existing regional forecasts. Impacts would be less than significant.

Modernization, Repair, Replacement, Upgrade, Remodel, Renovation and Installation

Operation of most types of improvements and repairs would not use water. The project would add new food service facilities to some campuses and improve existing food service facilities on some other campuses. As with new construction projects, the SUP would not expand District enrollment and therefore would not increase water use in the region. Impacts would be less than significant.

5.2.4 Applicable Regulations and Standard Conditions

- None.

5.2.5 Level of Significance Before Mitigation

The following impacts would be less than significant: 5.2-1, 5.2-2, 5.2-3, 5.2-4 and 5.2-5.

5.2.6 Mitigation Measures

No mitigation measures are required.

5. Environmental Analysis

AGRICULTURE AND FORESTRY RESOURCES

5.2.7 Level of Significance After Mitigation

Impacts would be less than significant.

5. Environmental Analysis

5.3 AIR QUALITY

This section of the EIR evaluates the potential for implementation of the SUP to impact air quality in the District. This section discusses regulatory framework (plans and policies from several jurisdictional agencies and LAUSD Standard Conditions)~~plans and policies from several jurisdictional agencies and LAUSD standard conditions, guidelines, specifications, practices, policies, and project design features (LAUSD Standards)~~, along with the existing air quality conditions throughout the SUP area, and possible environmental impacts that may occur as SUP-related site-specific projects are implemented~~during future phases of the SUP and site-specific projects implemented under the SUP.~~

TERMINOLOGY

Air basin. California is divided into 15 air basins to better manage air pollution. Air basin boundaries were determined by grouping together areas with similar geographical and meteorological features. While air pollution can move freely within an air basin, it can also sometimes be transported from one basin to another.¹ The Los Angeles Unified School District (LAUSD) is wholly within the South Coast Air Basin (SoCAB).

Ambient air quality standards (AAQS). The levels of air quality set for air pollutants that are considered to provide a reasonable margin of safety in the protection of the public health and welfare. There are both state and federally established AAQS.

Criteria air pollutants. These are air pollutants that have established federal and state AAQS and are identified and regulated under Title I in the Federal Clean Air Act of 1970. These pollutants include ozone (O₃), carbon monoxide (CO), sulfur dioxide (SO₂), nitrogen dioxide (NO₂), coarse particulate matter (PM₁₀), fine particulate matter (PM_{2.5}), and lead (Pb).

Toxic air contaminants. These are other air pollutants not identified as criteria air pollutants, but may cause or contribute to an increase in mortality or in serious illness, or may pose a present or potential hazard to human health. There are currently 187 toxic air contaminants (TACs) identified and regulated under Title III of the Federal Clean Air Act Amendments of 1990.² There are 244 TACs identified in Title 17 of the California Code of Regulations.³

Attainment/Nonattainment. These are designations for the air basins signifying whether air pollutants meet the National and California AAQS. An attainment status signifies that an air pollutant meets the AAQS within a specified air basin. A nonattainment status signifies that an air pollutant does not meet the AAQS within a specified air basin.

¹ California Air Resources Board. California Air Basins. March 2014, <http://www.arb.ca.gov/desig/airbasins/airbasins.htm>.

² United States Environmental Protection Agency. March 2014. <http://www.epa.gov/ttn/atw/pollsour.html>.

³ California Air Resources Board (CARB). 1999, December. Final Staff Report: Update to the Toxic Air Contaminant List.

5. Environmental Analysis

AIR QUALITY

5.3.1 Environmental Setting

5.3.1.1 REGULATORY FRAMEWORK

National, State, regional and local laws, regulations, plans, and guidelines are summarized below. The following regulatory framework discussion does not include all plans and policies that relate to air quality 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 date when a proposed site-specific school project undergoes review. Therefore, this section provides a general discussion of the most important plans and policies that apply to SUP-related projects. Although some of these may not directly applicable to the SUP or site-specific projects implemented under the SUP, they are included to assist in identifying potential impacts and significance thresholds. Applicable LAUSD Standards are also listed. See *Applicable Regulations and Standard Conditions* at end of this chapter for those that require District compliance.

Federal

Clean Air Act

The Clean Air Act (CAA) was passed in 1963 by the U.S. Congress and has been amended several times. The 1970 Clean Air Act amendments strengthened previous legislation and laid the foundation for the regulatory scheme of the 1970s and 1980s. In 1977, Congress again added several provisions, including nonattainment requirements for areas not meeting National AAQS and the Prevention of Significant Deterioration program. The 1990 amendments represent the latest in a series of federal efforts to regulate the protection of air quality in the United States and overhauled the planning provisions for areas not meeting the National AAQS. Basic elements of the CAA include provisions for attainment and maintenance of the national AAQS for major air pollutants (Title I), motor vehicle emissions and fuel standards (Title II), hazardous air pollutant standards (Title III), and stratospheric ozone protection (Title VI). The CAA allows states to adopt more stringent standards or to include other pollution species.

State

California Clean Air Act

The California Clean Air Act (CCAA), signed into law in 1988, requires all areas of the State to achieve and maintain the California AAQS by the earliest practical date. The California AAQS tend to be more restrictive than the National AAQS. The CCAA mandates achieving the health-based California AAQS at the earliest practical date.

California Code of Regulations, Title 13, Division 3, Chapter 9, Article 4.8, Section 2449.

CARB Rule 2449. General Requirements for In-Use Off-Road Diesel-Fueled Fleets. Requires off-road diesel vehicles to limit nonessential idling to no more than 5 consecutive minutes.

5. Environmental Analysis AIR QUALITY

California Code of Regulations, Title 13, Division 3, Chapter 10, Article 1, Section 2480

CARB Rule 2480. Airborne Toxic Control Measure to Limit School Bus Idling and Idling at Schools. This Rule requires school busses, transit busses, and commercial vehicles (gross vehicle weight greater than 10,001 pounds except of pickup trucks and zero emission vehicles) to limit nonessential idling to no more than 5 consecutive minutes when in 100 feet of a school.

California Code of Regulations, Title 13, Division 3, Chapter 10, Article 1, Section 2485

CARB Rule 2485. Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling. This Rule requires commercial vehicles weighing more than 10,001 pounds to limit nonessential idling to no more than 5 consecutive minutes.

California Education Code, Section 17213(c)(2)(c) and Public Resources Code, Section 21151.8(a)(1)(D)

These regulations require school districts to consider offsite sources of hazardous air emissions before acquiring property for a school site or approving an EIR or negative declaration for a school site acquisition or new school construction project. These sections require school districts to identify freeways and other busy traffic corridors where the edge of the roadway is within 500 feet of a proposed school site. A busy traffic corridor is defined as having 50,000 or more average daily vehicle trips in a rural area or 100,000 or more average daily trips in an urban area.⁴

California Education Code, Section 17213 and Public Resources Code, Section 21151.8(a)(1)(2)

These regulations require school districts to consider offsite sources of hazardous air emissions before acquiring property for a school site or approving an EIR or negative declaration for a school site acquisition or new school construction project. These sections require school districts to consult with appropriate agencies to identify facilities, including but not limited to freeways and other busy traffic corridors, large agricultural operations, and rail yards within one-fourth of a mile of a proposed school site that might reasonably be expected to emit hazardous air emissions.

California Code of Regulations, Title 24, Part 6

Energy conservation standards for new residential and nonresidential buildings were adopted by the California Energy Resources Conservation and Development Commission in June 1977 and are updated triannually in the **California Building Code**. Title 24, Part 6 requires the design of building shells and building components to conserve energy. The standards are updated periodically to allow for consideration and possible incorporation of new energy efficiency technologies and methods.

On May 31, 2012, the California Energy Commission adopted the 2013 Building Energy Efficiency Standards, which went into effect on January 1, 2014. Buildings that are constructed in accordance with the 2013 Building and Energy Efficiency Standards are 25 percent (residential) to 30 percent (nonresidential)

⁴ Education Code, Section 17213(d)(9)

5. Environmental Analysis

AIR QUALITY

more energy efficient than the 2008 standards as a result of better windows, insulation, lighting, ventilation systems, and other features that reduce energy consumption in homes and businesses.

California Code of Regulations, Title 24, Part 11

On July 17, 2008, the California Building Standards Commission adopted the nation's first green building standards. The **California Green Building Standards Code** (CALGreen) was adopted as part of the California Building Standards Code (Title 24). CALGreen established planning and design standards for sustainable site development, energy efficiency (in excess of the California Energy Code requirements), water conservation, material conservation, and internal air contaminants.⁵ The mandatory provisions of the California Green Building Code Standards became effective January 1, 2011.

California Code of Regulations, Title 20, Sections 1601 through 1608

The 2006 **Appliance Efficiency Regulations** were adopted by the California Energy Commission on October 11, 2006, and approved by the California Office of Administrative Law on December 14, 2006. The regulations include standards for both federally regulated appliances and non-federally regulated appliances.

California Code of Regulations, Title 13, Division 3, Chapter 1

Chapter 1 - Motor Vehicle Pollution Control Devices. The California Advanced Clean Cars Program has regulations and standards for controlling air pollutants and GHG emissions in cars and the Low Emission Vehicle Program III Standards are for control of criteria air pollutant emissions from new light- and medium-duty vehicles.

Federal and State Standards

Ambient Air Quality Standards

The National AAQS and California AAQS are the levels of air quality considered to provide a margin of safety in the protection of the public health and welfare. They are designed to protect "sensitive receptors" most susceptible to further respiratory distress, such as asthmatics, the elderly, very young children, people already weakened by other disease or illness, and persons engaged in strenuous work or exercise. Healthy adults can tolerate occasional exposure to air pollutant concentrations considerably above these minimum standards before adverse effects are observed.

Both California and the federal government have established health-based AAQS for seven air pollutants. As shown in Table 5.3-1 these pollutants include O₃, NO₂, CO, SO₂, PM₁₀, PM_{2.5}, and lead (Pb). In addition, the state has set standards for sulfates, hydrogen sulfide, vinyl chloride, and visibility-reducing particles. These standards are designed to protect the health and welfare of the populace with a reasonable margin of safety.

⁵ The green building standards became mandatory in the 2010 edition of the code.

5. Environmental Analysis
AIR QUALITY

Table 5.3-1 Ambient Air Quality Standards for Criteria Pollutants

Pollutant	Averaging Time	California Standard	Federal Primary Standard	Major Pollutant Sources
Ozone (O ₃)	1 hour	0.09 ppm	*	Motor vehicles, paints, coatings, and solvents.
	8 hours	0.070 ppm	0.075 ppm	
Carbon Monoxide (CO)	1 hour	20 ppm	35 ppm	Internal combustion engines, primarily gasoline-powered motor vehicles.
	8 hours	9.0 ppm	9 ppm	
Nitrogen Dioxide (NO ₂)	Annual Average	0.030 ppm	0.053 ppm	Motor vehicles, petroleum-refining operations, industrial sources, aircraft, ships, and railroads.
	1 hour	0.18 ppm	0.100 ppm	
Sulfur Dioxide (SO ₂)	Annual Arithmetic Mean	*	0.030 ppm ²	Fuel combustion, chemical plants, sulfur recovery plants, and metal processing.
	1 hour	0.25 ppm	0.075 ppm ^a	
	24 hours	0.04 ppm	0.014 ppm ^b	
Respirable Coarse Particulate Matter (PM ₁₀)	Annual Arithmetic Mean	20 µg/m ³	*	Dust and fume-producing construction, industrial, and agricultural operations, combustion, atmospheric photochemical reactions, and natural activities (e.g., wind-raised dust and ocean sprays).
	24 hours	50 µg/m ³	150 µg/m ³	
Respirable Fine Particulate Matter (PM _{2.5})	Annual Arithmetic Mean	12 µg/m ³	12 µg/m ^{3.c}	Dust and fume-producing construction, industrial, and agricultural operations, combustion, atmospheric photochemical reactions, and natural activities (e.g., wind-raised dust and ocean sprays).
	24 hours	*	35 µg/m ³	
Lead (Pb)	Monthly	1.5 µg/m ³	*	Present source: lead smelters, battery manufacturing & recycling facilities. Past source: combustion of leaded gasoline.
	Quarterly	*	1.5 µg/m ³	
	3-Month Average	*	0.15 µg/m ³	
Sulfates (SO ₄)	24 hours	25 µg/m ³	*	Industrial processes.
Visibility-Reducing Particles	8 hours	ExCo =0.23/km visibility of 10≥ miles ¹	No Federal Standard	Visibility-reducing particles consist of suspended particulate matter, which is a complex mixture of tiny particles that consists of dry solid fragments, solid cores with liquid coatings, and small droplets of liquid. These particles vary greatly in shape, size and chemical composition, and can be made up of many different materials such as metals, soot, soil, dust, and salt.
Hydrogen Sulfide	1 hour	0.03 ppm	No Federal Standard	Hydrogen sulfide (H ₂ S) is a colorless gas with the odor of rotten eggs. It is formed during bacterial decomposition of sulfur-containing organic substances. Also, it can be present in sewer gas and some natural gas, and can be emitted as the result of geothermal energy exploitation.

5. Environmental Analysis

AIR QUALITY

Table 5.3-1 Ambient Air Quality Standards for Criteria Pollutants

Pollutant	Averaging Time	California Standard	Federal Primary Standard	Major Pollutant Sources
Vinyl Chloride	24 hour	0.01 ppm	No Federal Standard	Vinyl chloride (chloroethene), a chlorinated hydrocarbon, is a colorless gas with a mild, sweet odor. Most vinyl chloride is used to make polyvinyl chloride (PVC) plastic and vinyl products. Vinyl chloride has been detected near landfills, sewage plants, and hazardous waste sites, due to microbial breakdown of chlorinated solvents.

Source: California Air Resources Board. 2013, June 4. Ambient Air Quality Standards. <http://www.arb.ca.gov/research/aaqs/aaqs2.pdf>.

Notes: ppm: parts per million; µg/m³: micrograms per cubic meter

* Standard has not been established for this pollutant/duration by this entity.

^a When relative humidity is less than 70 percent.

^b On June 2, 2010, a new 1-hour SO₂ standard was established and the existing 24-hour and annual primary standards were revoked. The 1971 SO₂ national standards (24-hour and annual) remain in effect until one year after an area is designated for the 2010 standard, except that in areas designated nonattainment for the 1971 standards, the 1971 standards remain in effect until implementation plans to attain or maintain the 2010 standards are approved.

^c On December 14, 2012, EPA lowered the federal primary PM_{2.5} annual standard from 15.0 µg/m³ to 12.0 µg/m³. EPA made no changes to the primary 24-hour PM_{2.5} standard or to the secondary PM_{2.5} standards.

Air Pollutants of Concern

Criteria Air Pollutants

Pollutants emitted into the ambient air by stationary and mobile sources are regulated by federal and state law. Air pollutants are categorized as primary or secondary. Primary air pollutants are emitted directly from sources. CO, volatile organic compounds (VOC), NO₂, SO₂, PM₁₀, PM_{2.5}, and lead (Pb) are primary air pollutants. Of these, CO, SO₂, NO₂, PM₁₀, PM_{2.5}, and lead are “criteria air pollutants,” which means that AAQS have been established for them. VOC and oxides of nitrogen (NO_x) are air pollutant precursors that form secondary criteria pollutants through chemical and photochemical reactions in the atmosphere. Ozone (O₃) and NO₂ are the principal secondary pollutants. A description of each of the primary and secondary criteria air pollutants and their known health effects is presented below.

Carbon Monoxide (CO) is a colorless, odorless, toxic gas produced by incomplete combustion of carbon substances, such as gasoline or diesel fuel. CO is a primary criteria air pollutant. CO concentrations tend to be the highest during winter mornings with little to no wind, when surface-based inversions trap the pollutant at ground levels. Because CO is emitted directly from internal combustion, engines and motor vehicles operating at slow speeds are the primary source of CO in the SoCAB. The highest ambient CO concentrations are generally found near traffic-congested corridors and intersections. The primary adverse health effect associated with CO is interference with normal oxygen transfer to the blood, which may result in tissue oxygen deprivation.⁶ The SoCAB is designated under the California and National AAQS as being in attainment of CO criteria levels.⁷

⁶ South Coast Air Quality Management District. 2005, May. *Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning*.

⁷ California Air Resources Board. 2013, April 1. Area Designations Maps/State and National. <http://www.arb.ca.gov/design/adm/adm.htm>.

5. Environmental Analysis

AIR QUALITY

Volatile Organic Compounds (VOC) are compounds composed primarily of atoms of hydrogen and carbon. Internal combustion associated with motor vehicle usage is the major source of hydrocarbons. Other sources of VOCs include evaporative emissions associated with the use of paints and solvents, the application of asphalt paving, and the use of household consumer products such as aerosols. There are no AAQS established for VOCs. However, because they contribute to the formation of O₃, South Coast Air Quality Management District (SCAQMD) has established a significance threshold for this pollutant.⁸

Nitrogen Oxides (NO_x) are a by-product of fuel combustion and contribute to the formation of ground-level O₃, PM₁₀, and PM_{2.5}. The two major forms of NO_x are nitric oxide (NO) and nitrogen dioxide (NO₂). NO is a colorless, odorless gas formed from atmospheric nitrogen and oxygen when combustion takes place under high temperature and/or high pressure. The principal form of NO₂ produced by combustion is NO. However, NO reacts with oxygen quickly to form NO₂, creating the mixture of NO and NO₂ commonly called NO_x. NO₂ acts as an acute irritant and is more injurious than NO in equal concentrations. At atmospheric concentrations, however, NO₂ is only potentially irritating. NO₂ absorbs blue light; the result is a brownish-red cast to the atmosphere and reduced visibility. NO₂ exposure concentrations near roadways are of particular concern for susceptible individuals, including people with asthma, asthmatics, children, and the elderly. Current scientific evidence links short-term NO₂ exposures, ranging from 30 minutes to 24 hours, with adverse respiratory effects, including airway inflammation in healthy people and increased respiratory symptoms in people with asthma. Also, studies show a connection between breathing elevated short-term NO₂ concentrations and increased visits to emergency departments and hospital admissions for respiratory issues, especially asthma.⁹ The SoCAB is designated an attainment area for NO₂ under the National AAQS and nonattainment under the California AAQS.^{10,11}

Sulfur Dioxide (SO₂) is a colorless, pungent, irritating gas formed by the combustion of sulfurous fossil fuels. It enters the atmosphere as a result of burning high-sulfur-content fuel oils and coal and from chemical processes at chemical plants and refineries. Gasoline and natural gas have very low sulfur content and do not release significant quantities of SO₂. When sulfur dioxide forms sulfates (SO₄) in the atmosphere, together these pollutants are referred to as sulfur oxides (SO_x). Thus, SO₂ is both a primary and secondary criteria air pollutant. At sufficiently high concentrations, SO₂ may irritate the upper respiratory tract. Current scientific evidence links short-term exposures to SO₂, ranging from 5 minutes to 24 hours, with an array of adverse respiratory effects, including bronchoconstriction and increased asthma symptoms. These effects are particularly important for asthmatics at elevated ventilation rates (e.g., while exercising or playing.) At lower concentrations and when combined with particulates, SO₂ may do greater harm by injuring lung tissue. Studies also show a connection between short-term exposure and increased visits to emergency departments

⁸ South Coast Air Quality Management District. 2005, May. *Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning*.

⁹ South Coast Air Quality Management District. 2005, May. *Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning*; U.S. Environmental Protection Agency (EPA). 2012, April 20. What are the Six Common Air Pollutants? <http://www.epa.gov/airquality/urbanair>.

¹⁰ California Air Resources Board. 2013, April 1. Area Designations Maps/State and National. <http://www.arb.ca.gov/desig/adm/adm.htm>.

¹¹ CARB has proposed to redesignate the SoCAB as attainment for NO₂ under the California AAQS (California Air Resources Board. 2013, October 23. *Proposed 2013 Amendments to Area Designations for State Ambient Air Quality Standards*. <http://www.arb.ca.gov/regact/2013/area13/area13isor.pdf>).

5. Environmental Analysis

AIR QUALITY

and hospital admissions for respiratory illnesses, particularly in at-risk populations including children, the elderly, and asthmatics.¹² The SoCAB is designated attainment under the California and National AAQS.¹³

Suspended Particulate Matter (PM₁₀ and PM_{2.5}) consists of finely divided solids or liquids such as soot, dust, aerosols, fumes, and mists. Two forms of fine particulates are now recognized and regulated. Inhalable coarse particles, or PM₁₀, include particulate matter with an aerodynamic diameter of 10 microns (i.e., 10 millionths of a meter or 0.0004 inch) or less. Inhalable fine particles, or PM_{2.5}, have an aerodynamic diameter of 2.5 microns (i.e., 2.5 millionths of a meter or 0.0001 inch) or less. Particulate discharge into the atmosphere results primarily from industrial, agricultural, construction, and transportation activities. Both PM₁₀ and PM_{2.5} may adversely affect the human respiratory system, especially in people who are naturally sensitive or susceptible to breathing problems. EPA scientific review concluded that PM_{2.5}, which penetrates deeply into the lungs, is more likely than PM₁₀ to contribute to health effects and at concentrations that extend well below those allowed by the current PM₁₀ standards. These health effects include premature death in people with heart or lung disease, nonfatal heart attacks, irregular heartbeat, aggravated asthma, decreased lung function, and increased respiratory symptoms (e.g., irritation of the airways, coughing, or difficulty breathing). Diesel particulate matter (DPM) is classified by the California Air Resources Board (CARB) as a carcinogen. Particulate matter can also cause environmental effects such as visibility impairment,¹⁴ environmental damage,¹⁵ and aesthetic damage.^{16,17} The SoCAB is a nonattainment area for PM_{2.5} under California and National AAQS and a nonattainment area for PM₁₀ under the California AAQS.^{18, 19}

Ozone (O₃) is commonly referred to as “smog” and is a gas that is formed when VOCs and NO_x, both by-products of internal combustion engine exhaust, undergo photochemical reactions in sunlight. O₃ is a secondary criteria air pollutant. O₃ concentrations are generally highest during the summer months when direct sunlight, light winds, and warm temperatures create favorable conditions for its formation. O₃ poses a health threat to those who already suffer from respiratory diseases as well as to healthy people. Breathing O₃ can trigger a variety of health problems, including chest pain, coughing, throat irritation, and congestion. It can worsen bronchitis, emphysema, and asthma. Ground-level O₃ also can reduce lung function and inflame the linings of the lungs. Repeated exposure may permanently scar lung tissue. O₃ also affects sensitive

¹² South Coast Air Quality Management District. 2005, May. *Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning*.

¹³ California Air Resources Board. 2013, April 1. *Area Designations Maps/State and National*.
<http://www.arb.ca.gov/desig/adm/adm.htm>.

¹⁴ PM_{2.5} is the main cause of reduced visibility (haze) in parts of the United States.

¹⁵ Particulate matter can be carried over long distances by wind and then settle on ground or water. The effects of this settling include: making lakes and streams acidic; changing the nutrient balance in coastal waters and large river basins; depleting the nutrients in soil; damaging sensitive forests and farm crops; and affecting the diversity of ecosystems.

¹⁶ Particulate matter can stain and damage stone and other materials, including culturally important objects such as statues and monuments.

¹⁷ South Coast Air Quality Management District. 2005, May. *Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning*; U.S. Environmental Protection Agency (EPA). 2012, April 20. *What are the Six Common Air Pollutants?*
<http://www.epa.gov/airquality/urbanair>.

¹⁸ California Air Resources Board. 2013, April 1. *Area Designations Maps/State and National*.
<http://www.arb.ca.gov/desig/adm/adm.htm>.

¹⁹ CARB approved the SCAQMD’s request to redesignate the SoCAB from serious nonattainment for PM₁₀ to attainment for PM₁₀ under the National AAQS on March 25, 2010, because the SoCAB has not violated federal 24-hour PM₁₀ standards during the period from 2004 to 2007. In June 2013, the EPA approved the State of California’s request to redesignate the South Coast PM₁₀ nonattainment area to attainment of the PM₁₀ National AAQS, effective on July 26, 2013

5. Environmental Analysis

AIR QUALITY

vegetation and ecosystems, including forests, parks, wildlife refuges, and wilderness areas. In particular, O₃ harms sensitive vegetation, including forest trees and plants during the growing season.²⁰ The SoCAB is designated extreme nonattainment under the California AAQS (1-hour and 8-hour) and National AAQS (8-hour).²¹

Lead (Pb) is a metal found naturally in the environment as well as in manufactured products. The major sources of lead emissions have historically been mobile and industrial sources. As a result of the EPA's regulatory efforts to remove lead from on-road motor vehicle gasoline, emissions of lead from the transportation sector dramatically declined by 95 percent between 1980 and 1999, and levels of lead in the air decreased by 94 percent between 1980 and 1999. Today, the highest levels of lead in air are usually found near lead smelters. The major sources of lead emissions to the air today are ore and metals processing and piston-engine aircraft operating on leaded aviation gasoline. Once taken into the body, lead distributes throughout the body in the blood and is accumulated in the bones. Depending on the level of exposure, lead can adversely affect the nervous system, kidney function, immune system, reproductive and developmental systems, and the cardiovascular system. Lead exposure also affects the oxygen-carrying capacity of the blood. The lead effects most commonly encountered in current populations are neurological effects in children and cardiovascular effects in adults (e.g., high blood pressure and heart disease). Infants and young children are especially sensitive to even low levels of lead, which may contribute to behavioral problems, learning deficits, and lowered IQ.²² However, in 2008 the EPA and CARB adopted more strict lead standards and special monitoring sites immediately downwind of lead sources recorded²³ very localized violations of the new state and federal standards. As a result of these localized violations, the Los Angeles County portion of the SoCAB was designated in 2010 as nonattainment under the California and National AAQS for lead.^{24, 25} Because emissions of lead are found only in projects that are permitted by SCAQMD, lead is not an air quality of concern for SUP-related projects.

Toxic Air Contaminants

The public's exposure to air pollutants classified as TACs is a significant environmental health issue in California. In 1983, the California Legislature enacted a program to identify the health effects of TACs and to reduce exposure to these contaminants to protect the public health. The California Health and Safety Code, Section 39655(a), defines a TAC as "an air pollutant which may cause or contribute to an increase in mortality

²⁰ South Coast Air Quality Management District. 2005, May. Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning.

²¹ California Air Resources Board. 2013, April 1. Area Designations Maps/State and National. <http://www.arb.ca.gov/desig/adm/adm.htm>.

²² South Coast Air Quality Management District. 2005, May. *Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning*; U.S. Environmental Protection Agency (EPA). 2012, April 20. What are the Six Common Air Pollutants? <http://www.epa.gov/airquality/urbanair>.

²³ South Coast Air Quality Management District. 2012, May 4. Source-oriented monitors record concentrations of lead at lead-related industrial facilities in the SoCAB, which include Exide Technologies in the City of Commerce; Quemetco, Inc., in the City of Industry; Trojan Battery Company in Santa Fe Springs; and Exide Technologies in Vernon. Monitoring conducted between 2004 through 2007 identified that the Trojan Battery Company and Exide Technologies exceed the federal standards.

²⁴ South Coast Air Quality Management District. 2012, May 4. Final 2012 Lead State Implementation Plan: Los Angeles County. <http://www.aqmd.gov/hb/attachments/2011-2015/2012May/2012-May4-030.pdf>.

²⁵ CARB has proposed to redesignate the SoCAB as attainment for lead under the California AAQS (California Air Resources Board. 2013, October 23. Proposed 2013 Amendments to Area Designations for State Ambient Air Quality Standards. <http://www.arb.ca.gov/regact/2013/area13/area13isor.pdf>).

5. Environmental Analysis

AIR QUALITY

or in serious illness, or which may pose a present or potential hazard to human health.” A substance that is listed as a hazardous air pollutant (HAP) pursuant to Section 112(b) of the federal Clean Air Act (42 United States Code, Section 7412[b]) is a toxic air contaminant. Under state law, the California Environmental Protection Agency (Cal/EPA), acting through CARB, is authorized to identify a substance as a TAC if it determines that the substance is an air pollutant that may cause or contribute to an increase in mortality or to an increase in serious illness, or may pose a present or potential hazard to human health.

California regulates TACs primarily through Assembly Bill (AB) 1807 (Tanner Air Toxics Act) and AB 2588 (Air Toxics “Hot Spot” Information and Assessment Act of 1987). The Tanner Air Toxics Act sets forth a formal procedure for CARB to designate substances as TACs. Once a TAC is identified, CARB adopts an “airborne toxics control measure” for sources that emit designated TACs. If there is a safe threshold for a substance (i.e., a point below which there is no toxic effect), the control measure must reduce exposure to below that threshold. If there is no safe threshold, the measure must incorporate toxics best available control technology to minimize emissions. To date, CARB has established formal control measures for 11 TACs, all of which are identified as having no safe threshold.

Air toxics from stationary sources are also regulated in California under the Air Toxics “Hot Spot” Information and Assessment Act of 1987. Under AB 2588, toxic air contaminant emissions from individual facilities are quantified and prioritized by the air quality management district or air pollution control district. High priority facilities are required to perform a health risk assessment and, if specific thresholds are exceeded, are required to communicate the results to the public in the form of notices and public meetings.

By the last update to the TAC list in December 1999, CARB has designated 244 compounds as TACs.²⁶ Additionally, CARB has implemented control measures for a number of compounds that pose high risks and show potential for effective control. The majority of the estimated health risks from TACs can be attributed to relatively few compounds, the most important being DPM.

In 1998, CARB identified diesel particulate matter as a TAC. Previously, the individual chemical compounds in diesel exhaust were considered TACs. Almost all diesel exhaust particle mass is 10 microns or less in diameter. Because of their extremely small size, these particles can be inhaled and eventually trapped in the bronchial and alveolar regions of the lung.

Regional

South Coast Air Quality Management District

SCAQMD is the air pollution control agency for areas within the SoCAB. It is responsible for controlling emissions from permitted stationary sources ranging from large power plants to gas stations. It is also responsible for preparing the air quality management plan (AQMP) for the SoCAB in coordination with the Southern California Association of Governments (SCAG). Since 1979, a number of AQMPs have been prepared. In addition, SCAQMD also develops and adopts rules to control emissions generated from various sources ranging from equipment, industrial processes, paints and solvents, to consumer products.

²⁶ California Air Resources Board (CARB). 1999, December. Final Staff Report: Update to the Toxic Air Contaminant List.

5. Environmental Analysis

AIR QUALITY

Air Quality Management Plan

2012 AQMP. On December 7, 2012, SCAQMD adopted the 2012 AQMP, which employs the most up-to-date science and analytical tools and incorporates a comprehensive strategy aimed at controlling pollution from all sources, including stationary sources, on-road and off-road mobile sources, and area sources.²⁷ It also addresses several state and federal planning requirements, incorporating new scientific information, primarily in the form of updated emissions inventories, ambient measurements, and new meteorological air quality models. The 2012 AQMP builds upon the approach identified in the 2007 AQMP for attainment of federal PM and ozone standards and highlights the significant amount of reductions needed and the urgent need to engage in interagency coordinated planning to identify additional strategies, especially in the area of mobile sources, to meet all federal criteria air pollutant standards within the timeframes allowed under the CAA. The 2012 AQMP demonstrates attainment of federal 24-hour PM_{2.5} standard by 2014 and the federal 8-hour ozone standard by 2023. It includes an update to the revised EPA 8-hour ozone control plan with new commitments for short-term NO_x and VOC reductions. The plan also identifies emerging issues of ultrafine (PM_{1.0}) particulate matter and near-roadway exposure, and an analysis of energy supply and demand.

State Implementation Plan for Lead is a criteria pollutant. In 2008 EPA designated the Los Angeles County portion of the SoCAB as a nonattainment area under the federal lead classification due to the addition of source-specific monitoring under the new federal regulation. This designation was based on two source-specific monitors in Vernon and in the City of Industry exceeding the new standard in the 2007 to 2009 period of data used. The remainder of the SoCAB, outside the Los Angeles County nonattainment area, remains in attainment of the new standard. On May 24, 2012, CARB approved the State Implementation Plan (SIP) revision for the federal lead standard, which EPA revised in 2008. Lead concentrations in this nonattainment area have been below the level of the federal standard since December 2011. The SIP revision was submitted to EPA for approval in June 2012.

Applicable SCAQMD Rules

The following is partial list of SCAQMD rules that are applicable to the construction and operation of new schools and school additions and modernizations.²⁸

- **SCAQMD Rule 201:** Permit to Construct. Requires a permit for installation of any equipment which releases air pollutants.
- **SCAQMD Rule 402:** Nuisance Odors. Prohibits the discharge of odors that cause injury, detriment, nuisance, or annoyance to a considerable number of people.
- **SCAQMD Rule 403:** Fugitive Dust. Requires control measures to reduce fugitive dust from active operations, storage piles, or disturbed surfaces so as to not be visible beyond the property line or exceed 20 percent opacity.

²⁷ South Coast Air Quality Management District. 2012. *Final 2012 Air Quality Management Plan*. <http://www.aqmd.gov/aqmp/2012aqmp/Final/index.html>.

²⁸ For the complete list of SCAQMD rules, go to <http://www.aqmd.gov/rules/rulesreg.html>.

5. Environmental Analysis

AIR QUALITY

- **SCAQMD Rule 1113:** Architectural Coatings. Limits VOC content by setting VOC standards for persons who supplies, sells, offers for sale, or manufactures any architectural coating for use in the SCAQMD.
- **SCAQMD Rule 1186:** PM₁₀ Emissions from Paved and Unpaved Roads, and Livestock Operations. Requires control measures to reduce fugitive dust from paved and unpaved roads in addition to livestock operations.
- **SCAQMD Rule 1403:** Asbestos Emissions from Demolition/Renovation Activities. Requires surveying for and asbestos-containing materials removal procedures and measures for handling and cleanup, storage, disposal, and landfilling of asbestos-containing materials.

LAUSD

Standard Conditions of Approval

This table lists the air quality ~~related standard conditions and project design features (PDF)~~ that ~~are~~ will be included as part of each SUP-related project, as appropriate.

<u>Reference #/PDF #</u>	<u>Topic</u>	<u>Trigger for Compliance</u>	<u>Implementation Phase</u>	<u>Standard Conditions and Project Design Features</u>
Standard Condition				
<u>SC-AQ-00</u> <u>1</u> <u>Compliance</u>	Air Toxics Health Risk	<u>Place new classrooms or outdoor play areas: If project includes new occupied spaces</u> <u>- Within ¼-mile of mobile and stationary emission sources</u> <u>- Within 500 feet of a major transportation corridor (freeway, major rail line)</u> <u>- Within 500 feet of a major stationary source of emissions</u> <u>- On the LAUSD priority list of schools most at risk from air pollution</u> <u>- Near a high-risk facility previously identified by the OEHS.</u>	Prior to project approval	OEHS CEQA Specification Manual, Appendix J, Air Toxics Health Risk Assessment (HRA). This document includes guidance on HRA Protocols <u>protocols</u> for permitted, nonpermitted, 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.
<u>SC-AQ-42</u>	Construction <u>Emissions</u>	<u>If project requires the use of large construction equipment</u>	During project construction	LAUSD's construction contractor shall ensure that construction equipment is properly tuned and maintained in accordance with manufacturer's specifications, <u>to ensure excessive emissions are not generated by unmaintained equipment.</u>
<u>SC-AQ-23</u>	Construction	<u>Requires a project</u>	During project	<u>LAUSD's LAUSD or its construction contractor shall:</u>

5. Environmental Analysis AIR QUALITY

Reference # PDF #	Topic	Trigger for Compliance	Implementation Phase	Standard Conditions and Project Design Features
	<u>Emissions</u>	requires a removal action for soil contamination	construction	<ul style="list-style-type: none"> • Maintain slow speeds with all vehicles. • Load impacted soil directly into transportation trucks to minimize soil handling. • Water/mist soil as it is being excavated and loaded onto the transportation trucks. • Water/mist and/or apply surfactants to soil placed in transportation trucks prior to exiting the site. • During dumping—minimize soil drop height into transportation trucks or stockpiles <u>during dumping</u>. • During transport, cover or enclose trucks transporting soils, increase freeboard requirements, and repair trucks exhibiting spillage due to leaks. • Cover the bottom of the excavated area with polyethylene sheeting when work is not being performed. • Place stockpiled soil on polyethylene sheeting and cover with similar material. • Place stockpiled soil in areas shielded from prevailing winds.
<u>SC-AQ-34</u>	Construction <u>Emissions</u>	<u>Exterior construction and the use of large, heavy or noisy construction equipment</u> When site-specific review of a school construction project identifies potentially significant adverse regional and localized construction air quality impacts.	During project construction	<p><u>LAUSD shall prepare an air quality assessment.</u></p> <p><u>If site-specific review of a school construction project identifies potentially significant adverse regional and localized construction air quality impacts, then LAUSD shall implement all feasible mitigation measures to reduce air pollutant emissions below the South Coast Air Quality Management District's (SCAQMD) regional and localized significance thresholds.</u></p> <p>LAUSD shall mandate in the that construction bid contracts for each project that identifies include potentially significant regional construction air quality impacts, that the construction contractor implement the mitigation measures identified in the air quality assessment analysis for the project. Measures shall reduce construction emissions during high-emission construction phases from vehicles and other fuel driven construction engines, activities that generate fugitive dust, and surface coating operations. Specific mitigation <u>air emission reduction</u> measures include, but are not limited to, the following:</p> <p><u>Exhaust Emissions</u></p> <ul style="list-style-type: none"> • Schedule construction activities that affect traffic flow to off-peak hours (e.g. between 10:00 AM and 3:00 PM). • Consolidate truck deliveries and/or limit the number of haul trips per day. • Route construction trucks off congested streets. • Employ high pressure fuel injection systems or engine timing retardation. • Utilize ultra-low sulfur diesel fuel, containing 15 ppm sulfur or less (ULSD) in all diesel construction equipment. • Use construction equipment rated by the United States Environmental Protection Agency as having Tier 3 (model year 2006 or newer) or Tier 4 (model year 2008 or newer) emission limits for engines between 50 and 750 horsepower. • Restrict non-essential diesel engine idle time, to not more than five consecutive minutes.

5. Environmental Analysis

AIR QUALITY

Reference #/PDF #	Topic	Trigger for Compliance	Implementation Phase	Standard Conditions and Project Design Features
				<ul style="list-style-type: none"> • Utilize electrical power rather than internal combustion engine power generators as soon as feasible during construction. • Utilize electric or alternatively fueled equipment, if feasible. • Utilize construction equipment with the minimum practical engine size. • Utilize low-emission on-road construction fleet vehicles. • Ensure construction equipment is properly serviced and maintained to the manufacturer's standards. <p><u>Fugitive Dust</u></p> <ul style="list-style-type: none"> • Apply non-toxic soil stabilizers according to manufacturers' specification to all inactive construction areas (previously graded areas inactive for ten days or more). • Replace ground cover in disturbed areas as quickly as possible. • Sweep streets at the end of the day if visible soil material is carried onto adjacent public paved roads (recommend water sweepers with reclaimed water). • Install wheel washers where vehicles enter and exit unpaved roads onto paved roads, or wash off trucks and any equipment leaving the site each trip. • Pave construction roads that have a traffic volume of more than 50 daily trips by construction equipment, and/or 150 daily trips for all vehicles. • Pave all construction access roads for at least 100 feet from the main road to the project site. • Water the disturbed areas of the active construction site at least three times per day, except during periods of rainfall. • Enclose, cover, water twice daily, or apply non-toxic soil binders according to manufacturers' specifications to exposed piles (i.e., gravel, dirt, and sand) with a five percent or greater silt content. • Suspend all excavating and grading operations when wind speeds (as instantaneous gusts) exceed 25 miles per hour (mph). • Apply water at least three times daily, except during periods of rainfall, to all unpaved road surfaces. • Limit traffic speeds on unpaved road to 15 mph or less. • Prohibit high emission causing fugitive dust activities on days where violations of the ambient air quality standard have been forecast by SCAQMD. • Tarp and/or maintain a minimum of 24 inches of freeboard on trucks hauling dirt, sand, soil, or other loose materials. • Limit the amount of daily soil and/or demolition debris loaded and hauled per day. <p><u>General Construction</u></p> <ul style="list-style-type: none"> • Utilize ultra-low VOC or zero-VOC surface coatings. • Phase construction activities to minimize maximum daily emissions. • Configure construction parking to minimize traffic interference. • Provide temporary traffic control during construction activities

5. Environmental Analysis

AIR QUALITY

Reference # PDF #	Topic	Trigger for Compliance	Implementation Phase	Standard Conditions and Project Design Features
				<p>to improve traffic flow (e.g., flag person).</p> <ul style="list-style-type: none"> • Develop a trip reduction plan for construction employees. • Implement a shuttle service to and from retail services and food establishments during lunch hours. • Increase distance between emission sources to reduce near-field emission impacts. • Require construction contractors to document compliance with the identified mitigation measures.
AQ 4	Air toxics health risk project siting criteria	If project includes new occupied spaces within ¼ mile of emission sources	Prior to final site selection	<p>LAUSD shall prepare an HRA if new classrooms are:</p> <ul style="list-style-type: none"> • Within 500 feet of a major transportation corridor (freeway, major rail line) such that health risks to students would be created or exacerbated. • Within 500 feet of a major stationary source of emissions such that health risks to students would be created or exacerbated. • On the priority list of schools most at risk from air pollution. • Near a high risk facility previously identified by the Office of Environmental Health Safety (OEHS) such that health risks to students would be created or exacerbated.
AQ 5	Air toxics health risk	When a health risk assessment identifies risks that exceed the standards	Prior to project construction	<p>LAUSD shall design each new heating, ventilation, and air conditioning (HVAC) system to mitigate impacts from air emissions to a level below the following thresholds: 1) maximum individual cancer risk (MICR) of 1 in 100,000; or 2) chronic hazard index of 1; or 3) acute hazard index of 1; or 4) 1 hour CO standard of 20 parts per million (ppm); or 5) 8-hour CO standard of 9.0 ppm; or 6) 1 hour NO₂ standard of 0.18 ppm; or 7) 24-hour PM₁₀ and PM_{2.5} standards (operation) of 2.5 µg/m³. Each HVAC system design shall contain such specifications, including but not limited to an appropriate American Society of Heating, Refrigerating and Air Conditioning Engineers (ASHRAE) minimum efficiency reporting value (MERV) for HVAC filters, as necessary to mitigate impacts to less than significant levels. The LAUSD shall implement all other measures to reduce health risks to acceptable levels as identified and recommended in the HRA. The HVAC system design specifications and requirements in addition to all other identified measures shall be noted and/or reflected on all building plans submitted to the Division of the State Architect.</p>
<u>SC-AQ-56</u>	Air Pollutant Emissions reduction	If project includes increases in student capacity and/or generates additional traffic.	During school operation	<p>LAUSD shall encourage ride-sharing programs for students and teachers as well as maintain fleet vehicles such as school buses, maintenance vehicles, and other service fleet vehicles in good condition in order to prevent significant increases in air pollutant emissions created by operation of a new school.</p>

5. Environmental Analysis

AIR QUALITY

5.3.1.2 EXISTING CONDITIONS

Regional Setting

LAUSD lies within the SoCAB, which includes all of Orange County and the non-desert portions of Los Angeles, Riverside, and San Bernardino counties. The SoCAB is in a coastal plain with connecting broad valleys and low hills and is bounded by the Pacific Ocean in the southwest quadrant, with high mountains forming the remainder of the perimeter. The general region lies in the semi-permanent high-pressure zone of the eastern Pacific. As a result, the climate is mild, tempered by cool sea breezes. This usually mild weather pattern is interrupted infrequently by periods of extremely hot weather, winter storms, and Santa Ana winds.²⁹

Temperature and Precipitation

The annual average temperature varies little throughout the SoCAB, ranging from the low to middle 60s, measured in degrees Fahrenheit (°F). With a more pronounced oceanic influence, coastal areas show less variability in annual minimum and maximum temperatures than inland areas. In contrast to a very steady pattern of temperature, rainfall is seasonally and annually highly variable. Almost all rain falls from November through April. Summer rainfall is normally restricted to widely scattered thundershowers near the coast, with slightly heavier shower activity in the east and over the mountains.

The Northern area, based on data collected from the Northridge Cal State Monitoring Station (ID No. 046263), has average lows ranging from 45.0°F to 64.1°F and average highs from 66.4°F to 92.3°F. The area has an average annual precipitation of 13.41 inches.³⁰ The South area, based on data collected from the Torrance Monitoring Station (ID No. 048973), has average lows from 44.3°F to 61.1°F and average highs from 65.9°F to 78.6°F with average annual precipitation of 13.55 inches.³¹ Average lows and highs for the West area, based on data collected from Culver City Monitoring Station (ID No. 042214), ranges from 45.3°F to 61.9°F and from 66.5°F to 79.0°F, respectively. Average annual precipitation for the area is 13.15 inches.³² The East area, based on data collected from the Los Angeles Civic Center Monitoring Station (ID No. 045115), has average lows from 48.3°F to 63.8°F and average highs from 66.4°F to 83.1°F.³³

Humidity

Although the SoCAB has a semiarid climate, the air near the earth's surface is typically moist because of the presence of a shallow marine layer. Except for infrequent periods when dry, continental air is brought into the SoCAB by offshore winds, the “ocean effect” is dominant. Periods of heavy fog, especially along the

²⁹ South Coast Air Quality Management District. 2005, May. Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning.

³⁰ Western Regional Climate Center (WRCC). 2014. Western U.S. Historical Summaries – Northridge Cal State Monitoring Station (Station ID No. 046263). <http://www.wrcc.dri.edu/cgi-bin/cliMAIN.pl?ca6263> (Accessed February 2014).

³¹ Western Regional Climate Center (WRCC). 2014. Western U.S. Historical Summaries – Torrance Monitoring Station (Station ID No. 048973). <http://www.wrcc.dri.edu/cgi-bin/cliMAIN.pl?ca8973> (Accessed February 2014).

³² Western Regional Climate Center (WRCC). 2014. Western U.S. Historical Summaries – Culver City Monitoring Station (Station ID No. 042214). <http://www.wrcc.dri.edu/cgi-bin/cliMAIN.pl?ca2214> (Accessed February 2014).

³³ Western Regional Climate Center (WRCC). 2014. Western U.S. Historical Summaries – Los Angeles Civic Center Monitoring Station (Station ID No. 045115). <http://www.wrcc.dri.edu/cgi-bin/cliMAIN.pl?ca5115> (Accessed February 2014).

5. Environmental Analysis

AIR QUALITY

coast, are frequent. Low clouds, often referred to as high fog, are a characteristic climatic feature. Annual average humidity is 70 percent at the coast and 57 percent in the eastern portions of the SoCAB.³⁴

Wind

Wind patterns across the south coastal region are characterized by westerly or southwesterly onshore winds during the day and by easterly or northeasterly breezes at night. Wind speed is somewhat greater during the dry summer months than during the rainy winter season.

Between periods of wind, periods of air stagnation may occur, both in the morning and evening hours. Air stagnation is one of the critical determinants of air quality conditions on any given day. During the winter and fall months, surface high-pressure systems over the SoCAB, combined with other meteorological conditions, can result in very strong, downslope Santa Ana winds. These winds normally continue a few days before predominant meteorological conditions are reestablished.

The mountain ranges to the east affect the transport and diffusion of pollutants by inhibiting their eastward transport. Air quality in the SoCAB generally ranges from fair to poor and is similar to air quality in most of coastal southern California. The entire region experiences heavy concentrations of air pollutants during prolonged periods of stable atmospheric conditions.³⁵

Inversions

In conjunction with the two characteristic wind patterns that affect the rate and orientation of horizontal pollutant transport, there are two similarly distinct types of temperature inversions that control the vertical depth through which pollutants are mixed. These are the marine/subsidence inversion and the radiation inversion. The combination of winds and inversions are critical determinants in leading to the highly degraded air quality in summer and the generally good air quality in the winter in the project area.³⁶

Nonattainment Areas

The AQMP provides the framework for air quality basins to achieve attainment of the state and federal AAQS through the SIP. Areas are classified attainment or nonattainment for particular pollutants, depending on whether they meet AAQS. Severity classifications for ozone nonattainment range from marginal, moderate, and serious to severe and extreme.

Transportation conformity for nonattainment and maintenance areas is required under the federal CAA to ensure federally supported highway and transit projects conform to the SIP. The EPA approved California's SIP revisions for attainment of the 1997 8-hour O₃ National AAQS for the SoCAB in March 2012. Findings for the new 8-hour O₃ emissions budgets for the SoCAB and consistency with the recently adopted 2012

³⁴ South Coast Air Quality Management District. 2005, May. Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning.

³⁵ South Coast Air Quality Management District. 2005, May. Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning.

³⁶ South Coast Air Quality Management District. 2005, May. Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning.

5. Environmental Analysis

AIR QUALITY

Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) were submitted to the EPA for approval.

The attainment status for the SoCAB is shown in Table 5.3-2. The SoCAB is also designated in attainment of the California AAQS for sulfates. The SoCAB will have to meet the new federal 8-hour O₃ standard by 2023, and the federal 24-hour PM_{2.5} standards by 2014 (with the possibility of up to a five-year extension to 2019, if needed). The SoCAB is designated as a nonattainment for NO₂ (entire basin) and lead (Los Angeles County only) under the California AAQS. However, CARB has proposed to redesignate the SoCAB as attainment for NO₂ and lead under the California AAQS.³⁷

Table 5.3-2 Attainment Status of Criteria Pollutants in the South Coast Air Basin

Pollutant	State	Federal
Ozone – 1-hour	Extreme Nonattainment	No Federal Standard
Ozone – 8-hour	Extreme Nonattainment	Extreme Nonattainment
PM ₁₀	Serious Nonattainment	Attainment/Maintenance ^a
PM _{2.5}	Nonattainment	Nonattainment
CO	Attainment	Attainment
NO ₂	Nonattainment ^b	Attainment/Maintenance
SO ₂	Attainment	Attainment
Lead	Nonattainment (Los Angeles County only) ^{b, c}	Nonattainment (Los Angeles County only) ^c
All others	Attainment/Unclassified	Attainment/Unclassified

Source: California Air Resources Board. 2013, April 1. Area Designations Maps/State and National. <http://www.arb.ca.gov/degis/adm/adm.htm>.

^a Annual standard revoked September 2006. CARB approved SCAQMD's request to redesignate the SoCAB from serious nonattainment for PM₁₀ to attainment for PM₁₀ under the National AAQS on March 25, 2010, because the SoCAB has not violated federal 24-hour PM₁₀ standards from 2004 to 2007. In June 2013, the EPA approved the State of California's request to redesignate the South Coast PM₁₀ nonattainment area to attainment of the PM₁₀ National AAQS, effective on July 26, 2013.

^b CARB has proposed to redesignate the SoCAB as attainment for lead and NO₂ under the California AAQS.³⁸

^c The Los Angeles portion of the SoCAB was designated nonattainment for lead under the new federal and existing state AAQS as a result of large industrial emitters. Remaining areas within the SoCAB are unclassified.

Multiple Air Toxics Exposure Study III

In 2000, SCAQMD conducted a study on ambient concentrations of TACs and estimated the potential health risks from air toxics. The results showed that the overall risk for excess cancer from a lifetime exposure to ambient levels of air toxics was about 1,400 in a million. The largest contributor to this risk was diesel exhaust, accounting for 71 percent of the air toxics risk. In 2008, SCAQMD conducted its third update to its study on ambient concentrations of TACs and estimated the potential health risks from air toxics. The results showed that the overall risk for excess cancer from a lifetime exposure to ambient levels of air toxics was about 1,200 in one million. The largest contributor to this risk was diesel exhaust, accounting for

³⁷ California Air Resources Board. 2013, October 23. Proposed 2013 Amendments to Area Designations for State Ambient Air Quality Standards. <http://www.arb.ca.gov/regact/2013/area13/area13isor.pdf>.

³⁸ California Air Resources Board. 2013, October 23. Proposed 2013 Amendments to Area Designations for State Ambient Air Quality Standards. <http://www.arb.ca.gov/regact/2013/area13/area13isor.pdf>.

5. Environmental Analysis AIR QUALITY

approximately 84 percent of the air toxics risk.³⁹ Excess cancer risk within the District boundaries can range from 175 to 1,850 in a million.⁴⁰

Existing Ambient Air Quality

Existing levels of ambient air quality and historical trends and projections for the LAUSD jurisdictional area are best documented by measurements made by SCAQMD. The following describes the existing ambient air quality for each of the ~~four District Educational Service Centers (ESC)~~ six Local Districts.

Northwest and Northeast ESC Local Districts

The air quality monitoring station available for ~~this~~ these areas is the Reseda Monitoring Station. This station monitors O₃, CO, NO₂, and PM_{2.5}. Data from this station is summarized in Table 5.3-3. The data show that the concentration levels of O₃ and PM_{2.5} of the areas regularly exceed the state and federal one-hour and eight-hour O₃ standards as well as the state federal PM_{2.5} standards. The CO and NO₂ standards have not been exceeded in the last five years for ~~this~~ these general areas.

Table 5.3-3 Ambient Air Quality Monitoring Summary (Northwest and Northeast ~~ESA~~ Local Districts)

Pollutant Standard ^a	Number of Days Threshold Exceeded and Maximum Levels during Violations				
	2008	2009	2010	2011	2012
Ozone (O₃)					
State 1-Hour ≥ 0.09 ppm	0	1	0	3	1
State 8-hour ≥ 0.07 ppm	39	31	37	35	39
Federal 8-Hour > 0.075 ppm	25	19	19	26	23
Max. 1-Hour Conc. (ppm)	0.123	0.135	0.122	0.130	0.129
Max. 8-Hour Conc. (ppm)	0.103	0.100	0.091	0.103	0.098
Carbon Monoxide (CO)					
State 8-Hour > 9.0 ppm	0	0	0	0	0
Federal 8-Hour ≥ 9.0 ppm	0	0	0	0	0
Max. 8-Hour Conc. (ppm)	2.88	2.84	2.60	2.77	2.70
Nitrogen Dioxide (NO₂)					
State 1-Hour ≥ 0.18 ppm	0	0	0	0	0
Max. 1-Hour Conc. (ppm)	0.091	0.070	0.075	0.0699	0.0709
Sulfur Dioxide (SO₂)^b					
State 1-Hour ≥ 0.04 ppm	*	*	*	*	*
Max. 1-Hour Conc. (ppm)	*	*	*	*	*
Coarse Particulates (PM₁₀)^b					
State 24-Hour > 50 µg/m ³	*	*	*	*	*
Federal 24-Hour > 150 µg/m ³	*	*	*	*	*
Max. 24-Hour Conc. (µg/m ³)	*	*	*	*	*
Fine Particulates (PM_{2.5})					

³⁹ South Coast Air Quality Management District. 2008, September. *Multiple Air Toxics Exposure Study in the South Coast Air Basin (MATES III)*.

⁴⁰ South Coast Air Quality Management District. 2008b, September. *Multiple Air Toxics Exposure Study III Model Estimated Carcinogenic Risk*, Accessed January 2014, <http://www3.aqmd.gov/webappl/matesiii/>.

5. Environmental Analysis

AIR QUALITY

Table 5.3-3 Ambient Air Quality Monitoring Summary (Northwest and Northeast ~~ESA~~ Local Districts)

Pollutant Standard ^a	Number of Days Threshold Exceeded and Maximum Levels during Violations				
	2008	2009	2010	2011	2012
Federal 24-Hour > 35 µg/m ³	2	1	1	1	2
Max. 24-Hour Conc. (µg/m ³)	50.5	39.9	40.7	39.8	41.6

Source: California Air Resources Board (CARB). 2014. Air Pollution Data Monitoring Cards (2008, 2009, 2010, 2011, and 2012), Accessed January 2014 ~~September 2015~~. <http://www.arb.ca.gov/adam/topfour/topfour1.php>.
ppm: parts per million; µg/m³: or micrograms per cubic meter.
^a Data obtained from the Anaheim—Reseda Monitoring Station at 18330 Gault in the City of Reseda.
^b Data not available at the Anaheim—Reseda Monitoring Station monitoring station.

South Local District ~~ESG~~

The air quality monitoring station available for South area is the North Long Beach Monitoring Station. This station monitors O₃, CO, NO₂, SO₂, PM₁₀, and PM_{2.5}. Data from this station is summarized in Table 5.3-4. The data show that the concentration levels of O₃ of the area has exceeded the state and federal one-hour and eight-hour O₃ standards. Concentration levels of NO₂ and PM₁₀ have also exceeded their respective state standards. Lastly, the federal PM_{2.5} standard has regularly been exceeded. The CO and SO₂ standards have not been exceeded in the last five years for this general area.

Table 5.3-4 Ambient Air Quality Monitoring Summary (South ~~ESA~~ Local District)

Pollutant/Standard ^a	Number of Days Threshold Were Exceeded and Maximum Levels during Such Violations				
	2008	2009	2010	2011	2012
Ozone (O₃)					
State 1-Hour ≥ 0.09 ppm	0	0	1	0	0
State 8-hour ≥ 0.07 ppm	1	0	1	0	0
Federal 8-Hour > 0.075 ppm	0	0	1	0	0
Max. 1-Hour Conc. (ppm)	0.093	0.089	0.101	0.073	0.084
Max. 8-Hour Conc. (ppm)	0.074	0.067	0.084	0.061	0.67
Carbon Monoxide (CO)					
State 8-Hour > 9.0 ppm	0	0	0	0	0
Federal 8-Hour ≥ 9.0 ppm	0	0	0	0	0
Max. 8-Hour Conc. (ppm)	2.49	2.17	2.08	2.56	2.17
Nitrogen Dioxide (NO₂)					
State 1-Hour ≥ 0.18 ppm	3	1	0	1	0
Max. 1-Hour Conc. (ppm)	0.125	0.111	0.0928	0.106	0.0772
Sulfur Dioxide (SO₂)					
State 1-Hour ≥ 0.04 ppm	0	0	0	0	0
Max. 1-Hour Conc. (ppm)	0.012	0.005	0.006	0.004	0.003
Coarse Particulates (PM₁₀)					
State 24-Hour > 50 µg/m ³	1	3	0	0	0
Federal 24-Hour > 150 µg/m ³	0	0	0	0	0
Max. 24-Hour Conc. (µg/m ³)	124.3	76.9	44.0	43.0	45.0
Fine Particulates (PM_{2.5})					
Federal 24-Hour > 35 µg/m ³	8	6	0	2	4

5. Environmental Analysis
 AIR QUALITY

Table 5.3-4 Ambient Air Quality Monitoring Summary (South ~~ESA~~ Local District)

Pollutant/Standard ^a	Number of Days Threshold Were Exceeded and Maximum Levels during Such Violations				
	2008	2009	2010	2011	2012
Max. 24-Hour Conc. ($\mu\text{g}/\text{m}^3$)	57.2	63.0	35.0	39.7	49.8

Source: California Air Resources Board (CARB). 2014. Air Pollution Data Monitoring Cards (2008, 2009, 2010, 2011, and 2012), Accessed January 2014, <http://www.arb.ca.gov/adam/topfour/topfour1.php>.
 ppm: parts per million; $\mu\text{g}/\text{m}^3$: or micrograms per cubic meter.
^a Data obtained from the North Long Beach Monitoring Station at 3648 N. Long Beach Boulevard in the City of Long Beach.

Central and East Local Districts~~ESC~~

The air quality monitoring station available for the Central and East Local Districts~~South area~~ is the Los Angeles – North Main Street Monitoring Station. This station monitors O₃, CO, NO₂, PM₁₀, and PM_{2.5}. Data from this station is summarized in Table 5.3-5. The data show that the concentration levels of O₃ and PM₁₀ of these areas ~~have~~ regularly exceeded the state and federal one-hour and eight-hour O₃ standards and well as the federal PM₁₀ standard. Concentration levels of NO₂ and PM₁₀ have also exceeded their respective state standards. The CO and SO₂ standards have not been exceeded in the last five years for ~~this~~ these general areas.

5. Environmental Analysis

AIR QUALITY

Table 5.3-5 Ambient Air Quality Monitoring Summary (Central and East-ESA Local District)

Pollutant/Standard ^a	Number of Days Threshold Were Exceeded and Maximum Levels during Such Violations				
	2008	2009	2010	2011	2012
Ozone (O₃)					
State 1-Hour ≥ 0.09 ppm	3	3	1	0	0
State 8-hour ≥ 0.07 ppm	6	5	1	0	2
Federal 8-Hour > 0.075 ppm	3	2	1	0	1
Max. 1-Hour Conc. (ppm)	0.109	0.139	0.098	0.087	0.093
Max. 8-Hour Conc. (ppm)	0.090	0.100	0.080	0.065	0.077
Carbon Monoxide (CO)					
State 8-Hour > 9.0 ppm	0	0	0	0	0
Federal 8-Hour ≥ 9.0 ppm	0	0	0	0	0
Max. 8-Hour Conc. (ppm)	1.96	2.17	2.32	2.40	1.91
Nitrogen Dioxide (NO₂)					
State 1-Hour ≥ 0.18 ppm	2	2	0	1	0
Max. 1-Hour Conc. (ppm)	0.122	0.115	0.089	0.1096	0.0773
Sulfur Dioxide (SO₂)					
State 1-Hour ≥ 0.04 ppm	0	0	0	0	0
Max. 1-Hour Conc. (ppm)	0.003	0.002	0.002	0.002	0.002
Coarse Particulates (PM₁₀)					
State 24-Hour > 50 µg/m ³	2	4	0	9	43
Federal 24-Hour > 150 µg/m ³	0	0	0	0	0
Max. 24-Hour Conc. (µg/m ³)	66.0	72.0	42.0	53.0	80.0
Fine Particulates (PM_{2.5})					
Federal 24-Hour > 35 µg/m ³	10	7	5	7	4
Max. 24-Hour Conc. (µg/m ³)	78.3	61.6	48.6	69.2	58.7

Source: California Air Resources Board (CARB). 2014. Air Pollution Data Monitoring Cards (2008, 2009, 2010, 2011, and 2012). Accessed September 2015.
<http://www.arb.ca.gov/adam/topfour/topfour1.php>.
 Note: ppm: parts per million; µg/m³: or micrograms per cubic meter.
^a Data obtained from the Los Angeles – North Main Street Monitoring Station at 1630 North Main Street in the City of Los Angeles.

West Local District ESC

The air quality monitoring station available for West ESC Local District is the Los Angeles – Westchester Parkway Monitoring Station. This station monitors O₃, CO, NO₂, SO₂, and PM₁₀. Data from this station is summarized in Table 5.3-6. The data show that within the past five recorded years, the concentration levels of O₃ of the area has exceeded the state and federal one-hour and eight-hour O₃ standards. Additionally, the concentration level of PM₁₀ has also exceeded the federal PM₁₀ standard. The CO, NO₂, and SO₂ standards have not been exceeded in the last five recorded years for this general area.

5. Environmental Analysis
AIR QUALITY

Table 5.3-6 Ambient Air Quality Monitoring Summary (West ESA Local District)

Pollutant/Standard ^a	Number of Days Threshold Were Exceeded and Maximum Levels during Such Violations				
	2008	2009	2010	2011	2012
Ozone (O₃)					
State 1-Hour ≥ 0.09 ppm	0	0	0	0	1
State 8-hour ≥ 0.07 ppm	1	0	0	0	1
Federal 8-Hour > 0.075 ppm	0	0	0	0	0
Max. 1-Hour Conc. (ppm)	0.086	0.077	0.089	0.078	0.106
Max. 8-Hour Conc. (ppm)	0.075	0.070	0.070	0.067	0.075
Carbon Monoxide (CO)					
State 8-Hour > 9.0 ppm	0	0	0	0	0
Federal 8-Hour ≥ 9.0 ppm	0	0	0	0	0
Max. 8-Hour Conc. (ppm)	2.53	1.99	2.19	1.79	1.51
Nitrogen Dioxide (NO₂)					
State 1-Hour ≥ 0.18 ppm	0	0	0	0	0
Max. 1-Hour Conc. (ppm)	0.094	0.077	0.0758	0.0976	0.0772
Sulfur Dioxide (SO₂)					
State 1-Hour ≥ 0.04 ppm	0	0	0	0	0
Max. 1-Hour Conc. (ppm)	0.004	0.006	0.004	0.002	0.002
Coarse Particulates (PM₁₀)					
State 24-Hour > 50 µg/m ³	0	1	0	0	0
Federal 24-Hour > 150 µg/m ³	0	0	0	0	0
Max. 24-Hour Conc. (µg/m ³)	50.0	52.0	37.0	41.0	31.0
Fine Particulates (PM_{2.5})^b					
Federal 24-Hour > 35 µg/m ³	*	*	*	*	*
Max. 24-Hour Conc. (µg/m ³)	*	*	*	*	*

Source: California Air Resources Board (CARB). 2014. Air Pollution Data Monitoring Cards (2008, 2009, 2010, 2011, and 2012), Accessed January 2014 ~~September~~ September 2015, <http://www.arb.ca.gov/adam/topfour/topfour1.php>.

Note: ppm: parts per million; µg/m³: or micrograms per cubic meter.

^a Data obtained from the Los Angeles – Westchester Parkway Monitoring Station at 7201 W. Westchester Parkway in the City of Los Angeles.

^b Data not available at Los Angeles – Westchester Parkway Monitoring Station monitoring station.

Sensitive Receptors

Some land uses are considered more sensitive to air pollution than others due to the types of population groups or activities involved. Sensitive population groups include children, the elderly, the acutely ill, and the chronically ill, especially those with cardiorespiratory diseases.

Residential areas are also considered sensitive to air pollution because residents (including children and the elderly) tend to be at home for extended periods of time, resulting in sustained exposure to any pollutants present. Other sensitive receptors include retirement facilities, hospitals, and schools. Recreational land uses are considered moderately sensitive to air pollution. Although exposure periods are generally short, exercise places a high demand on respiratory functions, which can be impaired by air pollution. In addition, noticeable air pollution can detract from the enjoyment of recreation. Industrial, commercial, retail, and office areas are considered the least sensitive to air pollution. Exposure periods are relatively short and intermittent, because the majority of the workers tend to stay indoors most of the time. In addition, the workforce is generally the

5. Environmental Analysis

AIR QUALITY

healthiest segment of the population. All of these types of land uses are present within LAUSD's service boundaries.

5.3.2 Thresholds of Significance

5.3.2.1 CEQA GUIDELINE THRESHOLDS

According to CEQA Guidelines Appendix G, ~~(CCR Sections 15000–15387)~~ and CEQA Statute ~~(PRC Section 21151.8)~~, a project would normally have a significant effect on the environment if it would:

- AQ-1 Conflict with or obstruct implementation of the applicable air quality plan.
- AQ-2 Violate any air quality standard or contribute substantially to an existing or projected air quality violation.
- AQ-3 Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors).
- AQ-4 Expose sensitive receptors to substantial pollutant concentrations.
- AQ-5 Create objectionable odors affecting a substantial number of people.

5.3.2.2 CEQA STATUE THRESHOLDS

- AQ-6 Is the boundary of the proposed school site within 500 feet of the edge of the closest traffic lane of a freeway or busy traffic corridor? If yes, would the project create an air quality health risk due to the placement of the School? (PRC Section 21151.8(a)(1)(D))
- AQ-7 Would the project create an air quality hazard due to the placement of a school within one-quarter mile of: (a) permitted and nonpermitted facilities identified by the jurisdictional air quality control board or air pollution control district; (b) freeways and other busy traffic corridors; (c) large agricultural operations; and/or (d) a rail yard, which might reasonably be anticipated to emit hazardous air emissions, or handle hazardous or acutely hazardous material, substances, or waste? (PRC Section 21151.8(a)(2))

5.3.2.3 SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT THRESHOLDS

The analysis of the proposed SUP's air quality impacts follows the guidance and methodologies recommended in SCAQMD's *CEQA Air Quality Handbook* and the significance thresholds on SCAQMD's website.⁴¹ CEQA allows the significance criteria established by the applicable air quality management or air pollution control district to be used to assess impacts of a project on air quality. SCAQMD has established thresholds of significance for regional air quality emissions for construction activities and project operation.

⁴¹ SCAQMD's Air Quality Significance Thresholds are current as of March 2011 and can be found at: <http://www.aqmd.gov/ceqa/hdbk.html>.

5. Environmental Analysis AIR QUALITY

In addition to the daily thresholds listed above, projects are also subject to the AAQS. These are addressed through an analysis of localized CO impacts and localized significance thresholds (LSTs).

Regional Significance Thresholds

SCAQMD has adopted regional construction and operational emissions thresholds to determine a project's cumulative impact on air quality in the SoCAB. Table 5.3-7 lists SCAQMD's regional significance thresholds.

Table 5.3-7 SCAQMD Regional Significance Thresholds

Air Pollutant	Construction Phase	Operational Phase
Reactive Organic Gases (ROGs)/ Volatile Organic Compounds (VOCs)	75 lbs/day	55 lbs/day
Carbon Monoxide (CO)	550 lbs/day	550 lbs/day
Nitrogen Oxides (NO _x)	100 lbs/day	55 lbs/day
Sulfur Oxides (SO _x)	150 lbs/day	150 lbs/day
Particulates (PM ₁₀)	150 lbs/day	150 lbs/day
Particulates (PM _{2.5})	55 lbs/day	55 lbs/day

Source: South Coast Air Quality Management District. 2011, March (Revised). SCAQMD Air Quality Significance Thresholds. <http://www.aqmd.gov/ceqa/handbook/signthres.pdf>.

CO Hot Spots

Areas of vehicle congestion have the potential to create pockets of CO called hot spots, which have the potential to exceed the state one-hour standard of 20 ppm or the eight-hour standard of 9 ppm. Because CO is produced in greatest quantities from vehicle combustion and does not readily disperse into the atmosphere, adherence to AAQS is typically demonstrated through an analysis of localized CO concentrations. Hot spots are typically produced at intersections, where traffic congestion is highest because vehicles queue for longer periods and are subject to reduced speeds. Typically, for an intersection to exhibit a significant CO concentration, it would operate at level of service (LOS) E or worse without improvements.⁴²

Localized Significance Thresholds

SCAQMD developed Localized Significance Thresholds (LSTs) to determine if emissions of NO₂, CO, PM₁₀, and PM_{2.5} generated at a project site (offsite mobile-source emissions are not included in the LST analysis) would expose sensitive receptors to substantial concentrations of criteria air pollutants. Table 5.3-8 shows the localized significance thresholds for projects in the SoCAB.

⁴² California Department of Transportation (Caltrans). 1997, December. Transportation Project-Level Carbon Monoxide Protocol. UCD-ITS-RR-97-21. Prepared by Institute of Transportation Studies, University of California, Davis.

5. Environmental Analysis

AIR QUALITY

Table 5.3-8 SCAQMD LSTs

Air Pollutant (Relevant AAQS)	Concentration
1-Hour CO Standard (CAAQS)	20 ppm
8-Hour CO Standard (CAAQS)	9.0 ppm
1-Hour NO ₂ Standard (CAAQS)	0.18 ppm
24-Hour PM ₁₀ Standard – Construction (SCAQMD) ^a	10.4 µg/m ³
24-Hour PM _{2.5} Standard – Construction (SCAQMD) ^a	10.4 µg/m ³
24-Hour PM ₁₀ Standard – Operation (SCAQMD) ^a	2.5 µg/m ³
24-Hour PM _{2.5} Standard – Operation (SCAQMD) ^a	2.5 µg/m ³

Source: South Coast Air Quality Management District. 2011, March (Revised). SCAQMD Air Quality Significance Thresholds.
<http://www.aqmd.gov/ceqa/handbook/signthres.pdf>.

Note: ppm – parts per million; µg/m³ – micrograms per cubic meter

^a Threshold is based on SCAQMD Rule 403. Since the SoCAB is in nonattainment for PM₁₀ and PM_{2.5}, the threshold is established as an allowable change in concentration. Therefore, background concentration is irrelevant.

To assist lead agencies, SCAQMD developed screening-level LSTs to back-calculate the mass amount (lbs. per day) of emissions generated onsite that would trigger the levels shown in Table 5.3-8 for projects under five acres. LSTs represent the maximum emissions at a project site that are not expected to cause or contribute to an exceedance of the most stringent federal or state AAQS. LSTs are based on the ambient concentrations of that pollutant within the project SRA and the distance to the nearest sensitive receptor. However, an LST analysis can only be conducted at a project level, and quantification of LSTs is not applicable for this program-level environmental analysis.

Health Risk Thresholds

Whenever a project would require 1) the use of chemical compounds that have been identified in SCAQMD Rule 1401, 2) the use of chemical compounds placed on CARB's air toxics list pursuant to Assembly Bill 1807 (AB 1807), Air Contaminant Identification and Control Act (1983), or 3) the use of chemical compounds placed on the EPA's National Emissions Standards for Hazardous Air Pollutants, an HRA is required by the SCAQMD. Table 5.3-9 lists the SCAQMD's TAC incremental risk thresholds for operation of a project. Residential, commercial, office, and institutional (e.g., schools, churches) uses do not use substantial quantities of TACs, and these thresholds are typically applicable for new industrial projects. Although not officially adopted by SCAQMD, these thresholds are also commonly used to determine air quality land use compatibility of a project with major sources of TACs. In addition, risk from criteria pollutants (CO, NO₂, PM₁₀, and PM_{2.5}) generated from non-construction-related sources are evaluated against the standards in Table 5.3-8, as required by the District's HRA Protocol.

Table 5.3-9 SCAQMD Toxic Air Contaminants Risk Thresholds

Maximum Incremental Cancer Risk	≥ 10 in 1 million (1 in 100,000)
Chronic Hazard Index (project increment)	≥ 1.0
Acute Hazard Index (program increment)	>1.0

Source: South Coast Air Quality Management District. 2011, March (Revised). SCAQMD Air Quality Significance Thresholds.
<http://www.aqmd.gov/ceqa/handbook/signthres.pdf>.

5. Environmental Analysis
 AIR QUALITY

5.3.3 Environmental Impacts

ANALYTIC METHODOLOGY

This air quality evaluation was prepared in accordance with the requirements of CEQA to determine if significant air quality impacts are likely to occur in conjunction with implementation of the SUP. SCAQMD has published the *CEQA Air Quality Handbook* (Handbook) and updates on its website to provide local governments with guidance for analyzing and mitigating project-specific air quality impacts. The Handbook provides standards, methodologies, and procedures for conducting air quality analyses in environmental impact reports and was used extensively in the preparation of this analysis. The SCAQMD has published additional guidance for LSTs—“Localized Significance Threshold Methodology for CEQA Evaluations” (2008)—that are intended to provide guidance in evaluating localized effects from emissions generated by a project. These documents were also used in the preparation of this analysis.

The applicable thresholds are identified in brackets after the impact statement.

Impact 5.3-1: SUP-related projects would be consistent with the applicable air quality management plan. [Threshold AQ-1]

All SUP Projects

Regional growth projections are used by SCAQMD to forecast future emission levels in the SoCAB. For southern California, these regional growth projections are provided by the Southern California Association of Governments (SCAG) and are partially based on land use designations included in city/county general plans. Typically, only large, regionally significant projects have the potential to affect the regional growth projections. The SUP is not a regionally significant project that would warrant Intergovernmental Review by SCAG. Any new facilities built under the SUP would be growth accommodating and would fulfill the educational needs of the existing local communities served by the District. Any new trip generating facilities would reduce vehicle miles traveled (VMT) by minimizing the need for the local residents to travel to farther schools. Additionally, it is anticipated that the regional emissions generated by operation of school improvements and/or new facilities would not exceed the SCAQMD regional significance emissions thresholds. Thus, the SUP would not be considered by SCAQMD to be a substantial source of air pollutant emissions, and would not conflict or obstruct implementation of the AQMP. Impacts would be less than significant.

Impact 5.3-2: Construction activities may generate short-term emissions that exceed of the South Coast Air Quality Management District’s regional significance thresholds and cumulatively contribute to the South Coast Air Basin nonattainment designations. [Thresholds AQ-2 and AQ-3]

Construction activities associated with the SUP would cause short-term emissions of criteria air pollutants. The primary source of NO_x, CO, and SO_x emissions is the operation of construction equipment. The primary sources of particulate matter (PM₁₀ and PM_{2.5}) emissions include activities that disturb the soil, such as grading and excavation, and building demolition and construction. The primary source of VOC emissions is the application of architectural coating and off-gas emissions associated with asphalt paving.

5. Environmental Analysis

AIR QUALITY

All SUP Projects

Site-specific school projects have not been identified under the SUP. Information regarding specific projects, soil types, and the locations of receptors would be needed in order to quantify the level of impact associated with construction activity. However, all future projects would be subject to regulatory measures (e.g., SCAQMD Rule 201 for a permit to operate, Rule 403 for fugitive dust control, Rule 1113 for architectural coatings, Rule 1403 for new source review, and CARB's Airborne Toxic Control Measures). In addition, all future individual school projects (e.g., new school facilities on new property or existing campus, building additions, facility renovations, athletic facility improvements, etc.) would also be subject to the LAUSD Standards. LAUSD requires incorporation of applicable measures for all school projects to reduce emissions of construction-related criteria air pollutants that exceed the SCAQMD regional construction emissions thresholds.

Compliance with state and local regulations and ~~the LAUSD PDF-SC-AQ-12, SC-PDF-AQ-23, and SC-PDF-AQ-3-4~~ would reduce construction-related criteria air pollutant emissions. However, these measures may not reduce construction-related emissions to below the SCAQMD regional construction significance thresholds for some SUP-related projects such as construction of large buildings on adjacent developed parcels. Additionally, in accordance with the SCAQMD methodology, emissions that exceed the regional significance thresholds would cumulatively contribute to the nonattainment designations of the SoCAB. The SoCAB is designated nonattainment for O₃ and particulate matter (PM₁₀ and PM_{2.5}). Emissions of VOC and NO_x are precursors to the formation of O₃. In addition, NO_x is a precursor to the formation of particulate matter (PM₁₀ and PM_{2.5}). Thus, a large project may cumulatively contribute to the nonattainment designations of the SoCAB for O₃ and particulate matter (PM₁₀ and PM_{2.5}). Therefore, construction-related air quality impacts are considered potentially significant and may not be feasibly mitigated to a level of insignificance.

Impact 5.3-3: SUP-related projects would not generate long-term emissions that would exceed the South Coast Air Quality Management District's regional significance thresholds and would not cumulatively contribute to the South Coast Air Basin nonattainment designations. [Thresholds AQ-2 and AQ-3]

Long-term air pollutant emissions are associated mobile sources (i.e., vehicle trips) and area sources (e.g., fuel use in landscaping equipment, aerosols, and off-gas emission from application of paints) and energy use (natural gas use, purchased energy). Typically, emissions from mobile sources are the largest contributor to the overall long-term emissions inventory associated with operation of a school.

New Construction on New Property or Existing Campus

Operation of a new school on an existing campus or adjacent parcel would result in the generation of vehicle trips and new localized air pollutant emissions from non-mobile sources (i.e., area sources and energy use). Overall, however, it is not anticipated that operation of a new school would generate long-term air pollutant emissions that would exceed the SCAQMD regional operation significance thresholds. As schools are typically growth accommodating land uses built to serve the local community, a new school would reduce the overall vehicle miles traveled in the region and thereby reduce mobile-source air pollutant emissions. Furthermore, it is not anticipated that even new schools would generate a substantial amount of non-

5. Environmental Analysis AIR QUALITY

transportation sources of emissions. The SUP does not include any new school projects on stand-alone sites. Table 5.3-10 shows the long-term air pollutant emissions generated from Central Los Angeles High School No. 12. This project consisted of the construction of a 19-classroom high school facility on a 1.28-acre LAUSD-owned site, adjacent to the existing Miguel Contreras Learning Complex and is used as a typical new school project under the SUP.

Table 5.3-10 Operational Phase Emissions of a Typical LAUSD School

Sector	Criteria Air Pollutant Emissions (pounds per day) ^a					
	VOC	NO _x	CO	SO ₂	PM ₁₀	PM _{2.5}
Central Los Angeles High School No. 12^b						
Stationary ^c	1	<1	<1	0	<1	<1
Mobile	15	15	63	<1	8	1
Total Project Emissions	16	16	63	<1	8	1
SCAQMD Regional Significance Thresholds	55	55	550	150	150	55
Significant?	No	No	No	No	No	No

Sources: High School No. 12: LAUSD, Central Los Angeles High School No. 12 Draft EIR, pg. 3B-16, certified July 12, 2011;

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

^a Values shown here represent the highest emissions between summer and winter emissions.

^b Based on 55,361 building square feet of school facilities, capacity of 500 high school students, and 855 average daily trips generated.

^c Combined emissions from area sources and energy usage.

As shown in the table, operational phase emissions would not exceed the SCAQMD regional operational phase significance thresholds. For new school construction projects that would replace existing land uses, the resulting net emissions would be similar to or lower than the emissions shown in the table. Additionally, as part of ~~PDF-SC-AQ-65~~, LAUSD shall encourage ride-sharing programs for students and teachers as well as maintain fleet vehicles such as school buses, maintenance vehicles, and other service fleet vehicles in good condition in order to prevent significant increases in air pollutant emissions created by operation of a new school. While individual projects under LAUSD's SUP would be less than SCAQMD's regional operational phase significance thresholds, it is unknown how many individual projects may occur under the SUP at the same time. However, the 10-year projection for the overall student population within the LAUSD jurisdiction indicates an overall 2.2 decrease from existing conditions (see Chapter 4 of this EIR). Additionally, the long-range 50-year projection of school aged population for Los Angeles County also indicates an overall decline compared to the existing student population. As new schools would generally be developed to accommodate growth and the overall student population would be on the decline, it is anticipated that development of new stand-alone schools or expansion of an existing campus to include a new school component (e.g., addition of an elementary school to an existing middle school campus) would be minimal. Thus, it is not anticipated that the overall operational phase emissions generated by cumulative projects under the SUP would exceed the SCAQMD thresholds of significance. Therefore, operational phase air pollutant emissions generated by the combination of the types of projects described in Chapter 4, *Program Description*, are considered less than significant.

5. Environmental Analysis

AIR QUALITY

Modernization, Repair, Replacement, Upgrade, Remodel, Renovation and Installation

Small SUP-related projects involving repair, replacement, upgrades, remodeling, or renovation would not increase capacity to existing schools. Thus, no new vehicle trips would be generated and there would be no increase in mobile source emissions for these types of school project. Furthermore, building improvements could also result in increased energy efficiency thereby reducing emissions from energy usage (i.e., natural gas). Future modernization projects could potentially add new capacity to existing schools through the installation of portable classrooms (see Chapter 4, Table 4-2 of this EIR). However, as discussed, overall student enrollment for the LAUSD is projected to decline for the next 10 years. Thus, it is anticipated that any portables would primarily be installed to accommodate the existing enrolled student population. Additionally, if the installation of portables is to accommodate growth, it is anticipated that emissions would be nominal and less than the emissions shown in Table 5.3-10. Furthermore, it would also contribute to the reduction of overall vehicle miles traveled in the region and mobile-source air pollutant emissions. Therefore, operational phase regional air quality impacts for this type of project would be less than significant.

Impact 5.3-4: Site-specific SUP projects may generate short-term emissions that exceed South Coast Air Quality Management District's localized significance thresholds and expose sensitive receptors to substantial pollutant concentrations. [Threshold AQ-4]

Implementation of the SUP could expose sensitive receptors to elevated pollutant concentrations during construction activities if it would cause or contribute significantly to elevating those levels. Unlike the construction emissions shown in Table 5.3-10 above, described in pounds per day, localized concentrations refer to an amount of pollutant in a volume of air (ppm or $\mu\text{g}/\text{m}^3$) and can be correlated to potential health effects. LSTs are the amount of project-related emissions generated at which localized concentrations (ppm or $\mu\text{g}/\text{m}^3$) would exceed the AAQS for criteria air pollutants for which the SoCAB is designated a nonattainment area.

All SUP Project

Concentrations of criteria air pollutant generated by a school project (i.e., New Construction on New Property/Existing Campus and Modernization, Repair, Replacement, Upgrade, Remodel, and Renovation) depend on the emissions generated onsite and the distance to the nearest sensitive receptor. Therefore, an LST analysis can only be conducted at a project-level, and quantification of LSTs is not applicable for this program-level environmental analysis. Future individual school projects of varying types could be built in proximity to existing sensitive receptors. Although application of LAUSD ~~PDF-SC-AQ-32~~, SC-AQ-3, and SC-AQ-4 would reduce localized air pollutant emissions construction equipment exhaust combined with fugitive dust particulate matter emissions generated from all types of school projects has the potential to expose sensitive receptors to substantial concentrations of criteria air pollutant emissions even after this reduction in impacts. Therefore, localized air quality impacts from short-term construction activities are considered potentially significant, and may not be feasibly mitigated to a level of insignificance.

5. Environmental Analysis

AIR QUALITY

Impact 5.3-5: Operation of SUP projects would not expose sensitive receptors to substantial pollutant concentrations. [Threshold AQ-4]

All SUP Projects

LSTs

Operation of schools would not generate substantial quantities of emission from onsite, stationary sources. Land uses that have the potential to generate substantial stationary sources of emissions that would require a permit from SCAQMD include industrial land uses, such as chemical processing, and warehousing operations where substantial truck idling could occur onsite. Schools do not fall within these categories of uses. While operation of schools would possibly result in the use of standard onsite mechanical equipment, air pollutant emissions generated from operation of this system would be nominal (see Table 5.3-10). Therefore, localized air pollution emissions from stationary sources would be less than significant.

CO Hotspot Analysis

Areas of vehicle congestion have the potential to create pockets of CO called hotspots. These pockets have the potential to exceed the state one-hour standard of 20 ppm or the eight-hour standard of 9.0 ppm. At the time of the 1993 Handbook, the SoCAB was designated nonattainment under the California AAQS and National AAQS for CO. With the turnover of older vehicles, introduction of cleaner fuels, and implementation of control technology on industrial facilities, CO concentrations in the SoCAB and in the state have steadily declined. Since 2007, the SCAQMD has been designated in attainment for CO under both the California AAQS and National AAQS. As identified within SCAQMD's 2003 AQMP and the 1992 Federal Attainment Plan for Carbon Monoxide (1992 CO Plan), peak carbon monoxide concentrations in the SoCAB were a result of unusual meteorological and topographical conditions and not a result of congestion at a particular intersection. A CO hotspot analysis was conducted for four busy intersections in Los Angeles at the peak morning and afternoon time periods and did not predict a violation of CO standards.⁴³ Under existing and future vehicle emission rates, a project would have to increase traffic volumes at a single intersection by more than 44,000 vehicles per hour—or 24,000 vehicles per hour where vertical and/or horizontal air does not mix—in order to generate a significant CO impact.⁴⁴ Implementation of the SUP would not produce the volume of traffic at any one intersection required to generate a CO hotspot.⁴⁵ Therefore, SUP-related CO hotspots impacts would be less than significant.

⁴³ The four intersections were Long Beach Boulevard and Imperial Highway; Wilshire Boulevard and Veteran Avenue; Sunset Boulevard and Highland Avenue; and La Cienega Boulevard and Century Boulevard. The busiest intersection evaluated (Wilshire and Veteran) had a daily traffic volume of approximately 100,000 vehicles per day and LOS E in the morning peak hour and LOS F in the evening peak hour.

⁴⁴ Bay Area Air Quality Management District (BAAQMD). 2011, May (Revised). California Environmental Quality Act Air Quality Guidelines.

⁴⁵ See Footnotes b and d of Table 5.3-10 in this chapter for representative average daily vehicle trips that would be generated for a high school and a K-8 school.

5. Environmental Analysis

AIR QUALITY

Impact 5.3-6: Implementation of SUP-related projects would not create objectionable odors. [Threshold AQ-5]

Nuisance odors from land uses in the SoCAB are regulated under SCAQMD Rule 402, Nuisance, which states:

A person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property. The provisions of this rule shall not apply to odors emanating from agricultural operations necessary for the growing of crops or the raising of fowl or animals.

All SUP Projects

The type of facilities that are considered to have objectionable odors include wastewater treatments plants, compost facilities, landfills, solid waste transfer stations, fiberglass manufacturing facilities, paint/coating operations (e.g., auto body shops), dairy farms, petroleum refineries, asphalt batch plants, chemical manufacturing, and food manufacturing facilities. Schools do not fall within these types of land uses. While use of landscaping equipment to maintain school property can generate exhaust fumes, the odors would be temporary. Similarly, any construction-related odor emissions from construction equipment exhaust and application of asphalt and architectural coatings would be temporary and intermittent in nature. Short-term construction-related odors are expected to cease upon the drying or hardening of the odor-producing materials. Therefore, odor impacts associated with implementation of the SUP are considered less than significant.

Impact 5.3-7: SUP-related projects would not expose sensitive receptors in proximity to freeways and major roadways to substantial pollutant concentrations. [Thresholds AQ-6 and AQ-7]

The majority of neighborhoods within the LAUSD boundaries can be characterized as urban communities. For these communities, emissions from mobile and stationary sources can contribute significantly to localized concentrations of air contaminants.

Carcinogenic toxic air contaminants that constitute the most of the known health risks from motor vehicle traffic include diesel particulate matter (DPM) from trucks, and benzene, formaldehyde, 1,3-butadiene, and acetaldehyde emissions from passenger vehicles. On a typical urban freeway (truck traffic of 10,000 to 20,000/day), DPM represents approximately 70 percent of the potential health risk from the vehicle traffic. The association of truck-related emissions with adverse health effects is generally strongest between 300 and 1,000 feet and diminishes with distance. The impact of traffic emissions is on a gradient that at some point becomes indistinguishable from the regional air pollution problem.⁴⁶ Typically, emissions generated from vehicles depend on vehicle mix, the rate at which pollutants are generated during the course of travel, and the number of vehicles traveling along the roadway network.

⁴⁶ California Air Resources Board (CARB). 2005, May. Air Quality and Land Use Handbook: A Community Health Perspective.

5. Environmental Analysis

AIR QUALITY

Stationary sources that can generate large quantities of DPM and other air toxics include rail yards, ports, refineries, warehouse distribution centers, dry cleaners, gasoline stations, and chrome platers. Warehousing distribution centers can generate DPM from the trucking operations that occur at their facilities. DPM can be generated from the exhaust stack of trucks and from operation of transport refrigeration units. In addition to the onsite emissions, truck travel in and out of warehousing distribution centers can also contribute to the local pollution.⁴⁷ Ports not only generate DPM, but also ozone and other particulate matter. Generators associated with ports include diesel-powered ships, harbor craft, cargo handling equipment, trucks, and locomotives.⁴⁸ Refineries are one of the largest generators of VOC and NO_x and also generate large amounts of particulate matter. In addition, they emit a variety of TACs (e.g., acetaldehyde, arsenic, antimony, benzene, DPM, and 1, 3-butadiene).

New Construction on New Property or Existing Campus

State-Funded School Projects

School projects under these categories that use state funds would be subject to Public Resources Code Section 21151.8 and Education Code Section 17213 pursuant to Title 5 requirements. These sections require the preparation of an HRA for state-funded school projects. The HRA would be prepared in accordance with the District's HRA Protocol. The assessment would identify stationary sources (permitted and nonpermitted) in addition to nearby freeways and major roadways within a quarter-mile radius of a proposed new school. Additionally, the assessment would also evaluate impacts from criteria air pollutants from roadways and other sources that are within 500 feet and may have a local impact. Under ~~PDF LAUSD SC-AQ-4 and AQ-5~~, LAUSD will implement measures necessary to reduce the potential cancer and noncancer risks to an acceptable level (i.e., below 10 in 1 million or a hazard index of 1). These specified mandatory measures, which could include installation of MERV filters in HVAC systems, would be incorporated into the design and construction of the new school facility. Compliance with California Education Code, Section 17213 and Public Resources Code, Section 21151.8 regulations, ~~and LAUSD SC-AQ-1 LAUSD OEHS CEQA Specification Manual, Appendix J, Air Toxics Health Risk Assessment, and PDF AQ 4 and AQ 5~~ would ensure that the exposure levels for students and staff near stationary sources and freeways and major roadways would be within the acceptable levels and less than the incremental risk thresholds.

The LAUSD Air Toxics Health Risk Assessment guidance document (LAUSD SC-AQ-1) is applicable for all permitted, nonpermitted, and mobile sources within a quarter mile of a project site 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. Additionally, the HRA protocol requires assessment of criteria air pollutants generated from roadways that exceed an annual average daily traffic count of 100,000 vehicles in urban areas, or 50,000 vehicles in rural areas that are within 500 feet of a project site. The six components required are:

- **Task 1:** Identify and Screen Potential Emission Sources
- **Task 2:** Characterize Sources

⁴⁷ California Air Resources Board (CARB). 2005, May. Air Quality and Land Use Handbook: A Community Health Perspective.

⁴⁸ California Air Resources Board (CARB). 2005, May. Air Quality and Land Use Handbook: A Community Health Perspective.

5. Environmental Analysis

AIR QUALITY

- **Task 3:** Predict Air Contaminant Levels
- **Task 4:** Assessment of Exposure
- **Task 5:** Health Risk Assessment
- **Task 6:** Preparation of Assessment Report

Specified mandatory measures to reduce health risks, could include installation of MERV filters in HVAC systems, would be incorporated into the design and construction of the new school facility. Therefore, health risk impacts for school projects subject to state requirements would be less than significant.

Non-State-Funded School Projects

School projects that are not state funded and therefore not subject to Public Resources Code Section 21151.8 and Education Code 17213 could potentially expose students and staff to health risks beyond the acceptable limits. However, ~~compliance with California Education Code, Section 17213 and Public Resources Code, Section 21151.8 regulations, and implementation of LAUSD SC-AQ-1 requires the OEHS CEQA Specification Manual, Appendix J, Air Toxics Health Risk Assessment, and PDF AQ 4 and AQ 5~~ preparation of an HRA and measures necessary to reduce the potential cancer and noncancer risks to an acceptable level. Therefore, health risk impacts for locally-funded school projects would be less than significant.

Modernization, Repair, Replacement, Upgrade, Remodel, Renovation and Installation

School projects under this category would involve modernization of existing facilities only. These types of projects would not alter or change the footprint of an existing classroom building or intensify building or school uses. Thus, these modernization projects would not cause a change of the exposure levels at existing schools. Therefore, health risk impacts for projects types under this category would be less than significant.

5.3.4 Applicable Regulations and Standard Conditions

State

- Hazardous air emissions (Ed Code Section 17213 and PCR Section 21151.8)
- California Advanced Clean Cars CARB (13 CCR, Division 3, Chapter 1)
- Low-Emission Vehicle Program – LEV III (13 CCR, Division 3, Chapter 1)
- Statewide Retail Provider Emissions Performance Standards (SB 1368).
- Airborne Toxics Control Measure to Limit School Bus Idling and Idling at Schools (13 CCR 2480)
- Airborne Toxic Control Measure to Limit Diesel-Fuel Commercial Vehicle Idling (13 CCR 2485)
- In-Use Off-Road Diesel Idling Restriction (13 CCR 2449)
- Building Energy Efficiency Standards (Title 24, Part 6)
- California Green Building Code (Title 24, Part 11)
- Appliance Energy Efficiency Standards (Title 20)

5. Environmental Analysis AIR QUALITY

Regional

- SCAQMD Rule 201: Permit to Construct
- SCAQMD Rule 402: Nuisance Odors
- SCAQMD Rule 403: Fugitive Dust
- SCAQMD Rule 1113: Architectural Coatings
- SCAQMD Rule 1186: Street Sweeping
- SCAQMD Rule 1403: Asbestos Emissions from Demolition/Renovation Activities

LAUSD Standards Conditions of Approval

- ~~SC-AQ-1 through SC-AQ-5~~ LAUSD OEHS CEQA Specification Manual, Appendix J, Air Toxics Health Risk Assessment (HRA) Protocol. December 2005, Revised June 2007.
- ~~Project Design Features: PDF AQ-1, PDF AQ-2, PDF AQ-3, PDF AQ-4, PDF AQ-5, and PDF AQ-6~~

5.3.5 Level of Significance Before Mitigation

Upon implementation of regulatory requirements and LAUSD Standards listed above, the following impacts would be less than significant: 5.3-1, 5.3-3, 5.3-5, 5.3-6 and 5.3-7.

Even with implementation of regulatory requirements and LAUSD Standards the following impacts would be **potentially significant**:

- **Impact 5.3-2** Construction activities could generate short-term emissions in exceedance of SCAQMD'S regional construction significance threshold criteria and cumulatively contribute to the nonattainment designations of the SoCAB.
- **Impact 5.3-4** Construction activities could generate short-term emissions in exceedance of SCAQMD'S localized significance threshold criteria and expose sensitive receptors to substantial pollutant concentrations.

5.3.6 Mitigation Measures

Impact 5.3-2

No feasible mitigation measures are available that would further reduce short-term emissions and impacts to the regional air quality.

5. Environmental Analysis

AIR QUALITY

Impact 5.3-4

No feasible mitigation measures are available that would further reduce potentially significant short-term localized emission impacts.

Impact 5.3-1, 5.3-3, 5.3-5, 5.3-6 and 5.3-7

No mitigation measures are required.

5.3.7 Level of Significance After Mitigation

Impact 5.3-2

Compliance with SCAQMD regulations and LAUSD ~~Standards~~ Standard Conditions would reduce criteria air pollutant emissions from construction-related activities. However, short-term emissions generated from future individual projects could still exceed the SCAQMD regional significance threshold criteria. ~~No additional mitigation measures are available to reduce impacts.~~ Therefore, Impact 5.3-2 is considered potentially **significant and unavoidable**.

Impact 5.3-4

Compliance with SCAQMD regulations and LAUSD ~~Standard~~ Conditionss would reduce criteria air pollutant emissions from construction-related activities. However, short-term onsite emissions generated from future individual projects could still exceed the SCAQMD localized significance threshold criteria even after this reduction. ~~No additional mitigation measures are available to reduce impacts.~~ Therefore, Impact 5.3-4 is considered potentially **significant and unavoidable**.

Impact 5.3-1, 5.3-3, 5.3-5, 5.3-6 and 5.3-7

Impacts would be less than significant.

5. Environmental Analysis AIR QUALITY

This page intentionally left blank

5. Environmental Analysis

5.4 BIOLOGICAL RESOURCES

This section of the program EIR evaluates the potential for implementation of the SUP to impact biological resources in the District. This section discusses regulatory framework (plans and policies from several jurisdictional agencies and LAUSD Standard Conditions)~~plans and policies from several jurisdictional agencies and LAUSD standard conditions, guidelines, specifications, practices, policies, and project design features (LAUSD Standards)~~, along with the existing biological resources throughout the SUP area (animal and plant species listed as endangered, threatened, or rare by the U.S. Fish and Wildlife Service or California Department of Fish and Wildlife; plant species listed as rare by the California Native Plant Society; natural communities that are considered rare and are known to provide habitat for sensitive animal or plant species, or are known to be important wildlife corridors; jurisdictional waters and wetlands; wildlife movement and migration corridors; and possible environmental impacts that may occur as SUP-related site-specific projects are implemented during future phases of the SUP and site-specific projects implemented under the SUP.

TERMINOLOGY

Italicized words refer to other words defined in this list.

Annual. A plant that lives only one year or season.

Bioregion. A region defined by physical and biological features such as watershed, terrain, and the types of plants and animals living there.

Herb. A flowering plant without woody stems.

Hydric soil. Soil that is permanently or seasonally saturated with water, such as soil found in wetlands.

Jurisdictional Waters. Include *Waters of the United States*, *wetlands* protected under the federal Clean Water Act, and streambeds and *riparian habitats* protected under state law. (See Section 5.4.1.1, Regulatory Framework, below, for further explanation.)

Mesic. Characterized by a moderate amount of moisture; that is, it is intermediate between *hydric* (saturated) and *xeric* (dry).

Natural communities. Recurring assemblages of plants and animals found in particular physical environments. Three characteristics distinguish natural communities: 1) plant species composition, 2) vegetation structure (e.g., forest, shrubland, or marsh), and 3) a specific combination of physical conditions (e.g., water, light, nutrient levels, and climate). Each natural community type occurs in specific settings in the landscape, such as wind-exposed rocky summits at high elevations, or muddy coastal river shores flooded daily by tides. Natural community types vary with changes in physical settings, resulting in predictable patterns across the landscape.

Perennial. Plants, especially *herbs*, with life cycles two years or longer.

5. Environmental Analysis

BIOLOGICAL RESOURCES

Pollutant. The term pollutant is defined very broadly by the National Pollutant Discharge Elimination System (NPDES) regulations and litigation and includes any type of industrial, municipal, and agricultural waste discharged into water. Pollutant sources are generally categorized as either point sources or nonpoint sources under NPDES regulations. Pollutants can enter waters of the United States from a variety of pathways, including agricultural, domestic, and industrial sources. Typical point source discharges include discharges from publicly owned treatment works, discharges from industrial facilities, and discharges associated with urban runoff. The majority of agricultural facilities are defined as nonpoint sources and are exempt from NPDES regulation. Direct sources discharge wastewater directly into the receiving water body, whereas indirect sources discharge wastewater to a publicly owned treatment work, which in turn discharges into the receiving water body.

Riparian Habitats. Habitats along the banks of rivers and streams.

Sensitive Natural Communities. Considered rare in the region by regulatory agencies; known to provide habitat for sensitive animal or plant species; or known to be important wildlife corridors.

Sensitive Species. Include those listed as endangered or threatened under the federal Endangered Species Act or California Endangered Species Act; species otherwise given certain designations by the California Department of Fish and Wildlife; and plant species listed as rare by the California Native Plant Society.

Take. Defined under the federal Endangered Species Act as “harass, harm, pursue, hunt, wound, kill, trap, capture, collect, or attempt to engage in any such conduct.”

Waters of the United States. Applies to the jurisdiction of the U.S. Army Corps of Engineers (Army Corps) under the Clean Water Act and includes: all waters that are currently used, were used in the past, or may be susceptible to use in interstate or foreign commerce, including all waters that are subject to the ebb and flow of the tide; all interstate waters including interstate wetlands; all other waters such as intrastate lakes, rivers, streams (including intermittent streams), mudflats, sandflats, wetlands, sloughs, prairie potholes, wet meadows, playa lakes, or natural ponds, the use, degradation or destruction of which could affect interstate or foreign commerce; water impoundments; tributaries of waters; territorial seas; wetlands adjacent to waters.

Wetlands. Defined under the federal Clean Water Act as land that is flooded or saturated by surface water or groundwater at a frequency and duration sufficient to support, and that normally does support, a prevalence of vegetation adapted to life in saturated soils. Wetlands include areas such as swamps, marshes, and bogs.

Xeric. Dry soils and habitats.

5.4.1 Environmental Setting

5.4.1.1 REGULATORY FRAMEWORK

National, State, regional and local laws, regulations, plans, and guidelines are summarized below. The following regulatory framework discussion does not include all plans and policies that relate to biological resources 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,

5. Environmental Analysis BIOLOGICAL RESOURCES

regulations, plans, and guidelines might not be up to date when a proposed site-specific school project undergoes review. Therefore, this section provides a general discussion of the most important plans and policies that apply to SUP-related projects. Although some of these may not directly applicable to the SUP or site-specific projects implemented under the SUP, they are included to assist in identifying potential impacts and significance thresholds. Applicable LAUSD Standard Conditions of Approval~~Standards~~ are also listed. See *Applicable Regulations and Standard Conditions* at end of this chapter for those that require District compliance.

Federal

United States Code, Title 16, Sections 1531 et seq.

The **Federal Endangered Species Act** (FESA) of 1973, as amended, was established to protect and conserve any species of plant or animal that is endangered or threatened with extinction and the habitats in which these species are found.¹

The FESA is one of the dozens of United States environmental laws passed in the 1970s. Signed into law by President Richard Nixon on December 28, 1973, it was designed to protect critically imperiled species from extinction as a “consequence of economic growth and development un-tempered by adequate concern and conservation.” The U.S. Supreme Court found that “the plain intent of Congress in enacting” the FESA “was to halt and reverse the trend toward species extinction, whatever the cost.” The act is administered by two federal agencies, the United States Fish and Wildlife Service (USFWS) and the National Oceanic and Atmospheric Administration.

Section 4(a) of the FESA requires that critical habitat be designated by the USFWS “to the maximum extent prudent and determinable, at the time a species is determined to be endangered or threatened.” Critical habitat is formally designated by USFWS to provide guidance for planners/managers and biologists with an indication of where suitable habitat may occur and where high priority of preservation for a particular species should be given.

Section 7 of the FESA, called “Interagency Cooperation,” is the mechanism by which federal agencies ensure that the actions they take, including those they fund or authorize, do not jeopardize the existence of any listed species. Section 7 of the FESA requires federal agencies to consult with the USFWS on proposed federal actions that may affect endangered, threatened, or proposed (for listing) species or critical habitat that may support the species.

Section 9 of the FESA prohibits “take” of endangered species.

Section 10 of the FESA provides the regulatory mechanism that allows the incidental take of a listed species by private interests and nonfederal government agencies during lawful activities. Habitat conservation plans (HCPs) for the impacted species must be developed in support of incidental take permits for nonfederal

¹ A list of titles and codes of regulations implementing FESA is available at <http://www.fws.gov/endangered/laws-policies/regulations-and-policies.html>.

5. Environmental Analysis

BIOLOGICAL RESOURCES

projects to minimize impacts to the species and develop viable mitigation measures to offset the unavoidable impacts.

United States Code, Title 16, Sections 703-712

The **Migratory Bird Treaty Act of 1918** (MBTA) is the domestic law that implements the United States' commitment to conventions with Canada, Japan, Mexico, and Russia for the protection of shared migratory bird resources. The MBTA governs the taking, killing, possession, transportation, and importation of migratory birds, their eggs, parts, and nests. Section 703 prohibits the take, possession, import, export, transport, sale, purchase, barter, or offering of these activities, except under a valid permit or as permitted in the implementing regulations. USFWS administers permits to take migratory birds in accordance with the regulations under the MBTA. The MBTA is implemented through regulations in the Code of Federal Regulations Title 50 Parts 20 through 22. MBTA typically does not prohibit otherwise lawful activities that result in unintended harm to birds. However, conduct "directed against wildlife," such as conduct by hunters and poachers would be a direct violation of the act.

United States Code, Title 33, Sections 1251 et seq.

The **Clean Water Act** (CWA) establishes the basic structure for regulating discharges of pollutants into the waters of the United States and regulating quality standards for surface waters. The basis of the CWA was enacted in 1948 and was called the Federal Water Pollution Control Act, but the Act was significantly reorganized and expanded in 1972. "Clean Water Act" became the Act's common name with amendments in 1972. The CWA is the statutory basis for the NPDES permit program and the basic structure for regulating the discharge of pollutants from point sources to waters of the United States. Section 402 of the CWA specifically required the Environmental Protection Agency (EPA) to develop and implement the NPDES program. The CWA made it unlawful to discharge any pollutant from a point source into navigable waters, unless a permit was obtained. EPA's NPDES permit program controls discharges. Point sources are discrete conveyances such as pipes or man-made ditches. Individual homes that are connected to a municipal system, use a septic system, or do not have a surface discharge do not need an NPDES permit; however, industrial, municipal, and other facilities such as schools must obtain permits if their discharges go directly to surface waters.

The CWA gives EPA the authority to set effluent limits on an industry-wide (technology-based) basis and on a water-quality basis that ensure protection of the receiving water. The CWA requires anyone who wants to discharge pollutants to first obtain an NPDES permit, or that discharge will be considered illegal.

The CWA allowed EPA to authorize state governments to perform many of the permitting, administrative, and enforcement aspects of the NPDES Program. In states that have been authorized to implement CWA programs, EPA retains oversight responsibilities. The key sections of the CWA that directly relate to the NPDES Permit Program include:

- Title I – Research and Related Programs
 - Section 101 – Declaration of Goals and Policy
- Title II – Grants for the Construction of Treatment Works

5. Environmental Analysis BIOLOGICAL RESOURCES

- Title III – Standards and Enforcement
 - Section 301 – Effluent Standards
 - Section 302 – Water Quality-Related Effluent Limitations
 - Section 303 – Water Quality Standards and Implementation Plans
 - Section 304 – Information and Guidelines [Effluent]
 - Section 305 – Water Quality Inventory
 - Section 307 – Toxic and Pretreatment Effluent Standards
- Title IV – Permits and Licenses
 - Section 401 – Certification
 - Section 402 – National Pollutant Discharge Elimination System
 - Section 405 – Disposal of Sewage Sludge
- Title V – General Provisions
 - Section 510 – State Authority
 - Section 518 – Indian Tribes

Section 401(a)(1)

CWA Section 401(a)(1) specifies that any applicant for a federal license or permit to conduct any activity that may result in any discharge into navigable waters shall provide the federal permitting agency a certification, issued by the State in which the discharge originates, that any such discharge will comply with the applicable provisions of the CWA. In California, the applicable Regional Water Quality Control Board (RWQCB) must certify that the project will comply with water quality standards. Permits requiring Section 401 certification include Army Corps Section 404 permits and NPDES permits issued by the EPA under Section 402 of the CWA. NPDES permits are issued by the applicable RWQCB. The District is within the jurisdiction of the Los Angeles RWQCB (Region 4).²

Section 402

CWA Section 402 authorizes the Administrator of the EPA to issue permits for discharge of pollutants to Waters of the U.S. Section 402 is implemented through NPDES regulations in Code of Federal Regulations Title 40 Parts 122 et seq.

The NPDES permit program controls water pollution by regulating point sources that discharge pollutants into waters of the United States. Individual homes that are connected to a municipal system, use a septic system, or do not have a surface discharge do not need an NPDES permit; however, industrial, municipal, and other facilities that discharge to waters of the U.S. must obtain permits. There are two categories of NPDES permits: individual permits and general permits.

² EPA. <http://water.epa.gov/lawsregs/rulesregs/>.

5. Environmental Analysis

BIOLOGICAL RESOURCES

- Individual permits are issued to individual dischargers and are specifically tailored to the specific facility to regulate its discharge of pollutants.
- General permits cover several entities that have the same type of discharge and set forth requirements applicable to the entire category of covered dischargers. The Statewide General Construction Activity Permit issued by the State Water Resources Control Board (Order No. 2012-0006-DWQ) is an example of a General Permit.

Section 404

Pursuant to CWA Section 404, a permit is required for any filling or dredging within “waters of the U.S.” Responsibility for administering and enforcing Section 404 is shared by the Army Corps and EPA.³ The Army Corps administers the day-to-day program, including individual permit decisions and jurisdictional determinations; develops policy and guidance; and enforces Section 404 provisions. EPA develops and interprets environmental criteria used in evaluating permit applications, identifies activities that are exempt from permitting, reviews/comments on individual permit applications, enforces Section 404 provisions, and has authority to veto Army Corps permit decisions.

The Army Corps regulates discharges of dredged or fill material into “waters of the U.S.,”⁴ including wetlands and non-wetland bodies of water that meet specific criteria. The permit review process entails an assessment of potential adverse impacts to Army Corps wetlands and jurisdictional waters, wherein the Army Corps may require mitigation measures. Where a federally listed species may be affected, a Section 7 consultation with USFWS may be required. If there is potential for cultural resources to be present, Section 106 review may be required. Also, where a Section 404 permit is required, a Section 401 Water Quality Certification would also be required from the RWQCB.⁵

Sections 301 and 502

Under CWA Sections 301 and 502, any discharge of dredged or fill materials into “waters of the United States,” including wetlands, is forbidden unless authorized by a permit issued by the Army Corps pursuant to Section 404. Essentially, all discharges of fill or dredged material affecting the bottom elevation of a jurisdictional water of the U.S. require a permit from the Army Corps. These permits are an essential part of protecting wetlands, which are often filled by land developers. Wetlands are vital to the ecosystem in filtering streams and rivers and providing habitat for wildlife.

³ Section 404 of the Clean Water Act includes “navigable waters” which is defined in Section 502(7) of the Act as “waters of the United States including the territorial seas.”

⁴ “Waters of the United States,” as it applies to the jurisdictional limits of the authority of the U.S. Army Corps of Engineers under the Clean Water Act, includes: all waters which are currently used, or were used in the past, or may be susceptible to use in interstate or foreign commerce, including all waters which are subject to the ebb and flow of the tide; all interstate waters including interstate wetlands; all other waters such as intrastate lakes, rivers, streams (including intermittent streams), mudflats, sandflats, wetlands, sloughs, prairie potholes, wet meadows, playa lakes, or natural ponds, the use, degradation or destruction of which could affect interstate or foreign commerce; water impoundments; tributaries of waters; territorial seas; wetlands adjacent to waters.

⁵ CWA Section 404 permit. <http://water.epa.gov/type/oceb/habitat/cwa404.cfm>.

5. Environmental Analysis BIOLOGICAL RESOURCES

State

Public Resources Code, Division 20

The California Coastal Act of 1976 (**Coastal Act**) includes specific policies that address issues such as shoreline public access and recreation, lower cost visitor accommodations, terrestrial and marine habitat protection, visual resources, landform alteration, agricultural lands, commercial fisheries, industrial uses, water quality, offshore oil and gas development, transportation, development design, power plants, ports, and public works.⁶ The policies of the Coastal Act constitute the statutory standards applied to planning and regulatory decisions made by the California Coastal Commission (Coastal Commission) and by local governments.

The Coastal Commission was established by voter initiative in 1972 (Proposition 20) and later made permanent by the Legislature through its passage of the Coastal Act.

The Coastal Commission, in partnership with coastal cities and counties, plans and regulates the use of land and water in the coastal zone. Development activities, which are broadly defined by the Coastal Act to include (among others) construction of buildings, divisions of land, and activities that change the intensity of use of land or public access to coastal waters, generally require a coastal permit from either the Coastal Commission or the local government.⁷

California Fish and Game Code Section 1600

The **Lake and Streambed Alteration Program** requires that a project proponent notify the California Department of Fish and Wildlife (CDFW) of any proposed alteration of streambeds, rivers, and lakes. The intent of the program is to protect habitats that are important to fish and wildlife. CDFW has regulatory authority over activities in streams and lakes. CDFW may review a project and place conditions on the project as part of a Streambed Alteration Agreement. Notification is required by any person, business, state, or local government agency or public utility that proposes an activity that will:

- substantially divert or obstruct the natural flow of any river, stream or lake;
- substantially change or use any material from the bed, channel, or bank of, any river, stream, or lake;
- deposit or dispose of debris, waste, or other material containing crumbled, flaked, or ground pavement where it may pass into any river, stream, or lake.

For such activities, LAUSD must provide written notification to CDFW pursuant to section 1600 et seq. of the Fish and Game Code. Notification is required by any person, business, state, or local government agency or public utility that proposes an activity

The notification requirement applies to any work undertaken in or near a river, stream, or lake that flows at least intermittently through a bed or channel. This includes ephemeral streams, desert washes, and watercourses with a

⁶ Public Resources Code, Division 20 (Coastal Act) <http://www.coastal.ca.gov/ccatc.html>.

⁷ Coastal Commission. <http://www.coastal.ca.gov/whoware.html>

5. Environmental Analysis

BIOLOGICAL RESOURCES

subsurface flow. It may also apply to work undertaken within the flood plain of a body of water. Based on this notification and other information, CDFW will determine if a Lake and Streambed Alteration Agreement (LSA) is required prior to construction. To minimize additional requirements pursuant to section 1600 et seq. the CEQA document should fully identify the potential impacts to streams or riparian resources and provide adequate avoidance, mitigation, monitoring and reporting commitments for issuance of the LSA.⁸

California Fish and Game Code Section 2080

The **California Endangered Species Act** (CESA) generally parallels the main provisions of the FESA and is administered by the CDFW. Its intent is to restrict take and protect state-listed endangered and threatened species of fish, wildlife, and plants. Unlike its federal counterpart, CESA also applies the take prohibitions to species petitioned for listing (state candidates). At the discretion of the Fish and Game Commission ~~Candidate-candidate species may be affor~~can be given temporary protection ~~as though they were already similar to listed as threatened or endangered species, at the discretion of the Fish and Game Commission.~~ Unlike the FESA, CESA does not include listing provisions for invertebrate species. Under certain conditions, CESA has provisions for take through an Incidental Take Permit under Section 2081 ~~permit~~ or Memorandum of Understanding (MOU). In addition, some sensitive mammals and birds are protected by the state as Fully Protected Species. California Species of Special Concern are species designated as vulnerable to extinction due to declining population levels, limited ranges, and/or continuing threats. This list is primarily a working document for the CDFW's California Natural Diversity Data Base (CNDDDB) project, which maintains a database of known and recorded occurrences of sensitive species. Informally listed ~~taxa~~ species are not protected per se, but warrant consideration in the preparation of biological resources assessments. The CESA is implemented through regulations in California Code of Regulations Title 14 Sections 783-786.6.

California Fish and Game Code Section 3503 and 3503.5

Fish and Game Code Section 3503 regulates the taking or destruction of bird nests and eggs. Under this section, "it is unlawful to take, possess, or needlessly destroy the nest or eggs of any bird," except as otherwise provided by the Fish and Game Code or any regulation implementing the Fish and Game Code.

Fish and Game Code Section 3503.5 prohibits the taking, possession, or destruction of any birds in the orders Falconiformes or Strigiformes (birds of prey) and the taking, possession, or destruction of the nests or eggs of any such birds except as otherwise provided by the Fish and Game Code or any regulation implementing the Fish and Game Code.

Regional

Los Angeles County Code of Ordinances, Title 22, Division 1, Chapter 22.56, Part 16 Oak Tree Permits, Section 22.56.2060

It is the intent of the oak tree permit, which the County of Los Angeles (County) issues to maintain and enhance the general health, safety, and welfare by assisting in counteracting air pollution and in minimizing soil erosion and other related environmental damage to oak trees. The oak tree permit is also intended to

⁸ CDFW SUP Draft EIR comment letter dated August 4, 2014.

5. Environmental Analysis BIOLOGICAL RESOURCES

preserve and enhance property values by conserving and adding to the distinctive and unique aesthetic character of many areas of Los Angeles County in which oak trees are indigenous. The stated objective of the oak tree permit is to preserve and maintain healthy oak trees in the development process.⁹

A person shall not cut, destroy, remove, relocate, inflict damage or encroach into a protected zone of any tree of the oak genus which is (a) eight inches in diameter as measured four and one-half feet above mean natural grade; in the case of an oak with more than one trunk, whose combined circumference of any two trunks is at least 12 inches in diameter on any lot or parcel of land within the unincorporated area of Los Angeles County, or (b) any tree that has been provided as a replacement tree, pursuant to Section 22.56.2180, on any lot or parcel of land within the unincorporated area of Los Angeles County, unless an oak tree permit is first obtained (22.56.2060). Project applicants that want an oak tree permit are required to file an application with the County and submit a copy of an oak tree report to the County forester and fire warden. The County forester and fire warden will review the report for the accuracy and inspect the project site, then determine replacement or relocation oak tree requirement.

Exemptions from this ordinance include emergency or routine maintenance by a public utility or municipal Public Works department, or trees planted, grown, and/or held for sale by a licensed nursery.¹⁰

Los Angeles County Code of Ordinances, Chapter 16.76: Cutting or Removal of Vegetation on Public Property

It is unlawful for any person, firm or corporation (other than the director of parks and recreation, with regard to public grounds or public property, or the road commissioner, with regard to public highways, or persons acting under their authority) to trim, prune, cut, break, deface, destroy, burn, or remove any shade or ornamental tree, hedge, plant, shrub or flower growing, or to grow upon any public highway, public ground or public property within the County of Los Angeles without the written permit of the director of parks and recreation, with regard to public grounds or public property, or the road commissioner, with regard to public highways. Replacement of removed trees is required as a condition of such permit.¹¹

Los Angeles County Code of Ordinances, Chapter 12.28: Brush and Vegetation

No person shall remove or destroy, or cause the removal or destruction of natural vegetation on sloping terrain within the unincorporated territory of the County of Los Angeles without first obtaining written approval from the County engineer. Sloping terrain is defined as having a grade of 8 percent or greater. Certain exceptions are provided, including brush removal within 150 feet of structures for human occupancy; removal of vegetation by work performed under a grading permit, and removal of a total of 2.5 acres or less of vegetation from land under one ownership or control if such removal is limited to an area not exceeding 2.5 acres within any 12-month period.¹²

⁹ Los Angeles County municipal code Section 22.56.2050. <https://library.municode.com/index.aspx?clientId=16274>.

¹⁰ Los Angeles County municipal code Section 22.56.2070. <https://library.municode.com/index.aspx?clientId=16274>.

¹¹ <https://library.municode.com/index.aspx?clientId=16274>.

¹² <https://library.municode.com/index.aspx?clientId=16274>.

5. Environmental Analysis

BIOLOGICAL RESOURCES

Local

City of Los Angeles Municipal Code, Sections 46.00 et seq.

Preservation of Protected Trees, of the City of Los Angeles Municipal Code protects oak, California black walnut (*Juglans californica*), western sycamore (*Platanus racemosa*), and California bay (*Umbellularia californica*) trees four or more inches in diameter at 4.5 feet above ground level, without a permit from the City Board of Public Works. Trees grown or held for sale by a licensed nursery, or trees planted or grown as a part of a tree planting program, are not defined as Protected Trees under this ordinance.¹³

Tree Protection Ordinances in Other Cities:

Municipal ordinances in other cities in the District protect street trees and other trees on properties of the respective cities.

Bell. Injuring street trees is prohibited under Chapter 12.24 of the Bell Municipal Code; removal of street trees by a property owner requires approval of the city council.¹⁴

Carson. City parkway trees are protected under Sections 3900 et seq. of the Carson Municipal Code. Parkway trees may be removed only by the city public works division.¹⁵

Gardena. Cutting, removing, or injuring street trees or other trees on city property is prohibited except under permit from the city public works director under Gardena Municipal Code Chapter 13.60.¹⁶

Huntington Park. Removing or destroying trees, shrubs, or plants on city property, including streets and parkways, is prohibited except under permit from the director of field services under Huntington Park Municipal Code Section 7.5-204.¹⁷

Lomita. Removal of city trees is prohibited except under permit from the city manager or their designee under Lomita Municipal Code Section 9-2.20.¹⁸

Maywood. Cutting, removing, or destroying street trees is prohibited, except under permit from the street superintendent, under Maywood Municipal Code Sections 10-2.01 et seq.¹⁹

San Fernando. Trees on city property, are protected under San Fernando Municipal Code Sections 98-26 et seq. Cutting, removing, or injuring city-owned trees is prohibited except by permit from the public works director.²⁰

¹³ [http://www.amlegal.com/nxt/gateway.dll/California/lamc/municipalcode?f=templates\\$fn=default.htm\\$3.0\\$vid=amlegal:losangeles_ca_mc](http://www.amlegal.com/nxt/gateway.dll/California/lamc/municipalcode?f=templates$fn=default.htm$3.0$vid=amlegal:losangeles_ca_mc).

¹⁴ <http://qcode.us/codes/bell/>.

¹⁵ <http://www.codepublishing.com/ca/carson.html>.

¹⁶ <http://www.codepublishing.com/CA/gardena/>.

¹⁷ <http://qcode.us/codes/huntingtonpark/>.

¹⁸ <http://library.municode.com/index.aspx?clientId=14960&stateId=5&stateName=California>.

¹⁹ <http://library.municode.com/index.aspx?clientId=16480>.

²⁰ <http://library.municode.com/index.aspx?clientId=11299>.

5. Environmental Analysis

BIOLOGICAL RESOURCES

South Gate. Damage to a tree on or above city property is prohibited, except under permit from the director of public works, under Municipal Code Chapter 5.33.

Palos Verdes Peninsula Natural Communities Conservation Plan/Habitat Conservation Plan (NCCP/HCP)

Small parts of the southwest corner of the District are in the Palos Verdes Peninsula Natural Communities Conservation Plan/Habitat Conservation Plan (NCCP/HCP). Although no habitat reserves established under the NCCP/HCP are within the District; two reserves, Switchbacks and Shoreline Park, are next to the southwest corner of the District's South educational service area.^{21,22} No District schools are in the NCCP/HCP plan area. The NCCP/HCP allows third-party beneficiaries—such as landowners and developers—to obtain incidental take authorizations through the NCCP/HCP by approval of the City of Rancho Palos Verdes, and for projects approved by the City of Rancho Palos Verdes. No other habitat conservation plans are in the District.²³

Los Angeles County Significant Ecological Areas Program

Significant Ecological Areas (SEAs) are areas where the County deems it important to facilitate a balance between limited development and resource conservation. Development activities in SEAs are reviewed closely in order to conserve fragile resources such as streams, oak woodlands and threatened or endangered species and their habitat. Sixty-one SEAs were established as part of the 1980 Los Angeles County General Plan. When adopted, the 2014 County General Plan Update would consolidate the previous SEAs into 27 SEAs.²⁴ There are SEAs in all regions of the County. Some SEAs are in incorporated cities and are subject to the regulations of those cities. SEAs in the District are listed in Table 5.4-1 and shown in Figure 5.4-1, *Significant Ecological Areas*. Topanga Elementary School is in the Santa Monica Mountains SEA in the Coastal Resource Area (SEA No. 22b).²⁵

²¹ NCCPs and/or HCPs usually cover areas larger than the habitat reserves established under the respective plans. The entire area covered is referred to as the *Plan Area*. That is the case with the Palos Verdes Peninsula NCCP/HCP; although small parts of the District are in the plan area of the NCCP/HCP, no reserves established under the NCCP/HCP are in the District.

²² City of Rancho Palos Verdes. 2006, June 26. NCCP Reserve Boundary Parcels. http://www.palosverdes.com/rpv/planning/Palos-Verdes-Nature-Preserve/NCCP%20Preserve.official%20map.06_26_06.pdf.

²³ U.S. Fish and Wildlife Service (USFWS). 2014, January 17. Habitat Conservation Plans. http://ecos.fws.gov/conserv_plans/servlet/gov.doi.hcp.servlets.PlanReport.

²⁴ Department of Regional Planning, Los Angeles County (DRP). 2014, February 26. Significant Ecological Area – SEAs & The General Plan.

²⁵ Department of Regional Planning, Los Angeles County (DRP). 2013, December. Significant Ecological Areas and Coastal Resource Areas Policy Map. Figure 9.3. http://planning.lacounty.gov/assets/upl/project/gp_2035_2014-FIG_9_3_significant_ecological_areas.pdf.

5. Environmental Analysis BIOLOGICAL RESOURCES

Table 5.4-1 Significant Ecological Areas Wholly or Partly in District

SEA Name and Number	District ESC/Local District	Portion of SEA in District
Santa Susana Mountains/Simi Hills – 23	NW	partial
Tujunga Valley/Hansen Dam – 25	NE	all
Verdugo Mountains – 27	NE	partial
Santa Monica Mountains – 22a	NW, W	partial
Santa Monica Mountains in Coastal Resource Area – 22b	W	partial
Griffith Park – 8	W, CE	all
Ballona Wetlands – 4	W	all
El Segundo Dunes – 7	W	all
Harbor Lake Regional Park – 9	S	all

Source: Department of Regional Planning, Los Angeles County (DRP). 2014, February 26. Significant Ecological Areas. <http://planning.lacounty.gov/sea/faqs>.

LAUSD

Standard Conditions of Approval

LAUSD Standards

This table lists the biological related standard conditions that will be included as part of each SUP-related project, as appropriate. This table lists the air quality related project design features (PDF) that are included as part of each SUP-related project, as appropriate.

PDF Reference #	Topic	Trigger for Compliance	Implementation Phase	Standard Conditions of Approval
Project Design Features				
SC-BIO-1	Sensitive species and habitat identification, impacts, and mitigation	When a project may affect sensitive species and/or their habitat within or near a project site; If a project will alter surface drainage in a way that affects sensitive species and/or their habitat.	As part of the site-specific CEQA review process; Agency-agency coordination prior to the start of construction; mitigation monitoring during construction	LAUSD <u>qualified biologist</u> shall identify sensitive species and their habitat within or near proposed project site. LAUSD will conduct a literature search, which shall consider a one-mile radius beyond the project construction site and shall be performed by a qualified biologist with knowledge of local biological conditions as well as the use and interpretation of the data sources identified below. Where appropriate, in the opinion of the biologist, the literature search shall be supplemented with a site visit and/or aerial photo analysis. Resources and information that shall be investigated for each site should include, but not be limited to: <ul style="list-style-type: none"> • Local offices of the USFWS; • National Marine Fisheries Services (NMFS); • CDFG CDFW; • California Native Plant Society (CNPS) • County and/or city and City planning or environmental offices for <u>Sensitive sensitive Species-species, habitat, and/or heritage trees</u> concerns that may not exist on published databases. These agencies can be consulted verbally or in writing. • _____ CNDDB • _____ CNPS Rare Plant Inventory

5. Environmental Analysis BIOLOGICAL RESOURCES

PDF Reference #	Topic	Trigger for Compliance	Implementation Phase	Standard Conditions of Approval
Project Design Features				
				<ul style="list-style-type: none"> ■● _____ Local Audubon Society ■● _____ Los Angeles County Department of Regional Planning for information on Significant Ecological Areas ■● _____ California Digital Conservation Atlas for district-wide location of reserves, plan areas, and land trusts that may overlap with project sites. ■ Jurisdictional Delineation <p>Biological Resources Report. In the biological resources report, the biologist shall recommend mitigation measures that may be necessary to reduce impacts on sensitive species to less than significant. Where If the LAUSD qualified biologist determines that a school construction project may will have a significant impact on affect an identified sensitive species, plant, animal, or habitat, a biological resources report shall be prepared. To provide a complete assessment of the flora and fauna within and adjacent to a site-specific project impact area, with particular emphasis on identifying endangered, threatened, sensitive, and locally unique species and sensitive habitats, the biological resources report shall include the following.</p> <ul style="list-style-type: none"> ● <u>Information on regional setting that is critical to the assessment of rare or unique resources</u> ● <u>A thorough, recent floristic-based assessment of special status plants and natural communities, following the CDFW's <i>Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities</i>. CDFW recommends that floristic, alliance- and/or association-based mapping and vegetation impact assessments be conducted at the project site and neighboring vicinity. The <i>Manual of California Vegetation (Sawyer et al.)</i> should also be used to inform this mapping and assessment. Adjoining habitat areas should be included in this assessment where site activities could lead to direct or indirect impacts offsite. Habitat mapping at the alliance level will help establish baseline vegetation conditions.</u> ● <u>A current inventory of the biological resources associated with each habitat type onsite and within the area of potential effect. CDFW's California Natural Diversity Data Base (CNDDDB) should be contacted to obtain current information on any previously reported sensitive species and habitat, including Significant Natural Areas identified under Chapter 12 of the Fish and Game Code.</u> ● <u>An inventory of rare, threatened, and endangered, and other sensitive species onsite and within the area of potential effect. Species to be addressed should include all those identified in CEQA Guidelines Section 15380, including sensitive fish, wildlife, reptile, and amphibian species. Seasonal variations in use of the project area should also be addressed. Focused species-specific surveys, conducted at appropriate time of year and time of day when sensitive species are active or otherwise identifiable, are required. Acceptable species-specific survey procedures should be developed in consultation with the CDFW and USFWS.</u>

5. Environmental Analysis BIOLOGICAL RESOURCES

PDF Reference #	Topic	Trigger for Compliance	Implementation Phase	Standard Conditions of Approval
Project Design Features				
				<ul style="list-style-type: none"> • <u>A discussion of the potential adverse impacts from light, noise, human activity, exotic species, and drainage. Drainage analysis should address project-related changes on drainage patterns on and downstream from the site; the volume, velocity, and frequency of existing and post- project surface flows; polluted runoff; soil erosion and/or sedimentation in streams and water bodies; and post-project fate of runoff from the project site.</u> • <u>Discussions about direct and indirect project impacts on biological resources, including resources in nearby public lands, open space, adjacent natural habitats, wetland and riparian ecosystems, and any designated and/or proposed or existing reserve lands (e.g., preserve lands associated with a NCCP). Impacts on, and maintenance of, wildlife corridor/movement areas, including access to undisturbed habitats in adjacent areas.</u> • <u>Mitigation measures for adverse project-related impacts to sensitive plants, animals, and habitats. Measures should emphasize avoidance and reduction of biological impacts. For unavoidable impacts, onsite habitat restoration or enhancement should be outlined. If onsite measures are not feasible or would not be biologically viable, offsite measures through habitat creation and/or acquisition and preservation in perpetuity should occur. This measure should address restrictions on access, proposed land dedications, monitoring and management programs, control of illegal dumping, water pollution, increased human intrusion, etc.</u> • <u>Plans for restoration and vegetation shall be prepared by qualified biologist with expertise in southern California ecosystems and native plant vegetation techniques. Plans shall include, at a minimum:</u> <ul style="list-style-type: none"> - <u>location of the mitigation site</u> - <u>plant species to be used, container sizes, and seeding rates</u> - <u>schematic depicting the mitigation area</u> - <u>planting schedule</u> - <u>irrigation method</u> - <u>measures to control exotic vegetation</u> - <u>specific success criteria</u> - <u>detailed monitoring program</u> - <u>contingency measures should the success criteria not be met</u> - <u>identification of the party responsible for meeting the success criteria and providing for conservation of the site in perpetuity.</u> <p>LAUSD shall consult with the U.S. Army Corps of Engineers, USFWS and/or the CDFW and comply with any permit conditions or directives from those agencies regarding the protection, relocation, creation, and/or mitigation compensation. LAUSD shall replace or restore affected habitat and surface drainage as required by the USFWS, CDFW and/or the U.S. Army Corps of Engineers.</p>
SC-BIO-2	Light	If a project	During lighting	LAUSD shall protect sensitive species from harmful exposure to

5. Environmental Analysis
BIOLOGICAL RESOURCES

PDF Reference #	Topic	Trigger for Compliance	Implementation Phase	Standard Conditions of Approval
Project Design Features				
	impacts Impacts to sensitive Species	includes N -new outdoor lighting that is near sensitive species habitat.	installation and prior to first use of lights	light by shielding light sources, redirecting light sources, or using low intensity lighting.
SC-BIO-3	Bird and Bat Nesting Sites	Project site or construction s# <u>taging are near and/or cause direct disturbances to native and nonnative vegetation, structures, and/or substrates</u> tree or building removal is required during nesting season (March-February 1 through August 31; as early as January 1 for some raptors)), and native bird species have been identified.	Prior to start of construction	<p>LAUSD shall comply with the following either:</p> <ul style="list-style-type: none"> Project activities (including, but not limited to, staging and disturbances to native and nonnative vegetation, structures, and substrates²⁶) should occur outside of avian breeding season to avoid take of birds or their eggs.²⁷ Depending on the avian species present, a qualified biologist may determine that a change in the breeding season dates is warranted. If avoidance of the avian breeding season is not feasible, Retain a qualified biologist to conduct an intensive nest search in all trees and buildings slated for removal before construction begins. If nests with young are found, the LAUSD shall not remove the trees until the young have fledged or the nest has been abandoned; or, Delay tree or building removal until between September 1 and February 28 to ensure reproductive success for native species using the site for nesting beginning 30 days prior to the initiation of the project activities, a qualified biologist with experience in conducting breeding bird surveys shall conduct weekly bird surveys to detect protected native birds occurring in suitable nesting habitat that is to be disturbed and (as access to adjacent areas allows) any other such habitat within 300 feet of the disturbance area (within 500 feet for raptors). The surveys shall continue on a weekly basis with the last survey being conducted no more than three days prior to the initiation of project activities. If a protected native bird is found, LAUSD shall delay all project activities within 300 feet of the suitable nesting habitat (within 500 feet for suitable raptor nesting habitat) until August 31. Alternatively, the qualified biologist could continue the surveys in order to locate any nests. If an active nest is located, project activities within 300 feet of the nest (within 500 feet for raptor nests), or as determined by a qualified biologist, shall be postponed until the nest is vacated and juveniles have fledged and there is no evidence of a second attempt at nesting. Flagging, stakes, and/or construction fencing shall be used to demarcate the inside boundary of the 300- or 500-foot buffer between the project activities and the nest. Project personnel, including all contractors working on site, shall be instructed on the sensitivity of the area. LAUSD shall provide results of the recommended protective measures to document compliance with applicable State and Federal laws pertaining to the protection of native birds. If the qualified biologist determines that a narrower buffer between the project activities and observed active nests is

²⁶ Substrate is the surface on which a plant or animal lives.

²⁷ Take means to hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture or kill (Fish and Game Code Section 86), and includes take of eggs and/or young resulting from disturbances that cause abandonment of active nests.

5. Environmental Analysis BIOLOGICAL RESOURCES

PDF Reference #	Topic	Trigger for Compliance	Implementation Phase	Standard Conditions of Approval
Project Design Features				
				<p>warranted, a written explanation as to why (e.g., species-specific information; ambient conditions and birds' habituation to them; and the terrain, vegetation, and birds' lines of sight between the project activities and the nest and foraging areas) shall be submitted to LAUSD OEHS project manager. Construction contractors can then reduce the demarcated buffer.</p> <ul style="list-style-type: none"> • No construction shall occur within the fenced next zone until the young have fledged, are no longer being fed by the parents, have left the nest, and will no longer be impacted by the construction. • A biological monitor shall be present on site during all grubbing and clearing of vegetation to ensure that these activities remain outside the demarcated buffer and that the flagging, stakes, and/or construction fencing are maintained, and to minimize the likelihood that active nests are abandoned or fail due to project activities. The biological monitor shall send weekly monitoring reports to LAUSD OEHS project manager during the grubbing and clearing of vegetation, and shall notify LAUSD immediately if project activities damage avian nests.
SC-BIO-4	Mature Native Oak Trees	If project requires the removal of one or more any native healthy mature oak trees or woodland habitat-	During construction	<p>LAUSD shall comply with the following:</p> <p>—Mitigation shall not include translocation of rare plants. LAUSD shall follow options will occur:</p> <ul style="list-style-type: none"> • CDFW, in most cases does not recommend translocation, salvage, and/or transplantation of rare, threatened, or endangered plant species, in particular oak trees, as compensation for adverse effects because successful implementation of translocation is rare. Even if translocation is initially successful, it will typically fail to persist over time. • Permanent conservation of habitat. To ensure the conservation of sensitive plant species, the preferred method is permanent conservation of habitat containing these species; any translocation proposed shall only be an experimental component of a larger, more robust plan. • Off-site acquisition of woodland habitat. Due to the inherent difficulty in creating functional woodland habitat with associated understory components, the preferred method is off-site acquisition of woodland habitat in the local area. All acquired habitat shall be protected under a conservation easement and deeded to a local land conservancy for management and protection. • Creation of oak woodlands. Relocate the tree(s) to another location on the property where the conditions are favorable to survival. Any creation of functioning woodlands shall be of similar composition, structure, and function of the affected oak woodland. The new woodland shall mimic the function, demonstrate recruitment, plant density, and percent basal canopy, and vegetation cover, as well as other measurable success criteria before the measure is deemed a success. <ul style="list-style-type: none"> - All seed and shrub sources used for tree and understory species in the new planting site shall be collected or grown from on-site sources or from adjacent areas and shall not be purchased from a supplier. This method should reduce the

5. Environmental Analysis
BIOLOGICAL RESOURCES

PDF Reference #	Topic	Trigger for Compliance	Implementation Phase	Standard Conditions of Approval
Project Design Features				
				<p><u>risk of introducing diseases and pathogens into areas where they might not currently exist.</u></p> <ul style="list-style-type: none"> - <u>Oaks should be replaced by planting acorns because this has been shown to result in greater oak survival. Monitoring efforts, including the exclusion of herbivores, shall be employed to maximize seedling survival during the monitoring period.</u> - <u>Monitoring period for oak woodland shall be at least 10 years with a minimum of seven years without supplemental irrigation. This allows the trees to go through one typical drought cycle. This should also be the minimal time needed to see signs of stress and disease and determine the need for replacement plantings.</u> • <u>LAUSD shall request CDFW review and comment on any translocation plans, habitat preservation, habitat creation and/or restoration plans.</u> <p>÷</p> <ul style="list-style-type: none"> • <u>Replace each healthy mature oak tree within the same property boundaries with at least two new oak trees; or</u> • <u>If the options 1 and 2 are not feasible, then LAUSD shall plant a different native species as replacement.</u>
SC-BIO-5	<u>Wetlands, Riparian Habitat, and other Sensitive Natural Community</u>	<u>May affect wetlands, riparian habitat, and other sensitive natural community</u>	<u>As part of the site-specific CEQA review process; agency coordination prior to the start of construction; monitoring during and after construction</u>	<p><u>LAUSD shall comply with CDFW recommendations as listed below:²⁸</u></p> <ul style="list-style-type: none"> • <u>Project development or conversion that results in a reduction of wetland acreage or wetland habitat values shall not occur unless, at a minimum, replacement or preservation results in “no net loss” of either wetland habitat values or acreage.</u> • <u>All wetlands and watercourses, whether intermittent or perennial, should be retained and provided with substantial setbacks which preserve the riparian and aquatic values and maintain their value to on-site and off-site wildlife populations.</u> • <u>A jurisdictional delineation of creeks and their associated riparian habitats shall be conducted as part of the biological resources report. The delineation should be conducted pursuant to the USFWS wetland definition.</u> • <u>Implementation of recommended measures shall compensate for affected mature riparian corridors and loss of function and value of wildlife corridors.</u>

5.4.1.2 EXISTING CONDITIONS

Regional Setting

California has been divided into 10 bioregions—that is, ecologically and geographically defined areas—by the California Resources Agency. Bioregions are defined based on geology, landforms, soils, climate, vegetation, land use, and wildlife. The District is in the South Coast Bioregion, which extends from the southern half of Ventura County to the Mexican Border and east to the edge of the Mojave Desert. The climate of most of

²⁸ Recommendations as listed in CDFW SUP Draft EIR comment letter dated August 4, 2014.

5. Environmental Analysis

BIOLOGICAL RESOURCES

the South Coast Bioregion is mild year-round with warm dry summers and wet winters. Habitat varies widely, from chaparral, juniper-pinyon woodland, and grasslands at lower elevations to mixed hardwood forest, southern oak, southern Jeffrey pine, and southern yellow pine at higher levels.²⁹ Much of the South Coast Bioregion is urbanized.

District Setting

Plant Communities and Habitat

LAUSD schools are developed with buildings; paved areas including parking lots, hardcourts, and walkways; and landscaped areas, including turf playfields and ornamental landscaping of trees, shrubs, and/or grass. Playfields and ornamental turf on school campuses are not suitable habitat for sensitive species due to frequent disturbances for athletic and recreational uses and for maintenance activities such as mowing. Some LAUSD campuses contain native gardens; however, these are instructional and ornamental gardens and are frequently disturbed by instructional and maintenance activities.³⁰

Vegetation types in the part of the District in the San Gabriel Mountains include mixed chaparral, montane hardwood, chamise-redshank chaparral, and coastal scrub.³¹ However, there are no LAUSD schools in the part of the District in the San Gabriel Mountains.

Mixed chaparral. Associated shrubs including chamise, silk-tassel, toyon, yerba-santa, California fremontia, scrub oak, chaparral oak, and species of ceanothus and manzanita.

Montane hardwood. At lower elevations, montane hardwood overstory species typically include oaks, white alder, bigleaf maple, bigcone Douglas-fir, and California-laurel. Understory vegetation usually is dominated by chaparral species such as coffeeberry, manzanita, and ceanothus. A wide variety of wildlife relies on this habitat, including jays, woodpeckers, squirrel, black bear, mule deer, and various reptiles and amphibians.

Chamise-redshank chaparral. Nearly pure stands of chamise or redshank. Wildlife species associated with this chaparral are similar to those associated with sagebrush and coastal sage scrub.

Coastal sage scrub. Found at elevations below 2,500 feet in climates with mild temperatures and maritime influence. Shrubs are knee high with soft flexible leaves that are often drought deciduous (they lose their leaves during the summer dry season). Common species include California sagebrush, brittle-bush, California buckwheat, and various types of sage.

Topanga Elementary Charter School at 22075 Topanga School Road is adjacent to Topanga State Park. Vegetation types in the state park immediately north of the school include coastal oak woodland and annual grassland.³²

²⁹ California Resources Agency (CRA). 1998, December. South Coast Bioregion.

³⁰ For example, LAUSD's website mentions a native garden at Millikan Middle School in Sherman Oaks. <http://home.lausd.net/apps/events/2013/4/20/1456243/?id=1>.

³¹ National Park Service (NPS). 2011, September. San Gabriel Watershed and Mountains: Special Resource Study and Environmental Assessment. <http://parkplanning.nps.gov/document.cfm?documentID=43639>.

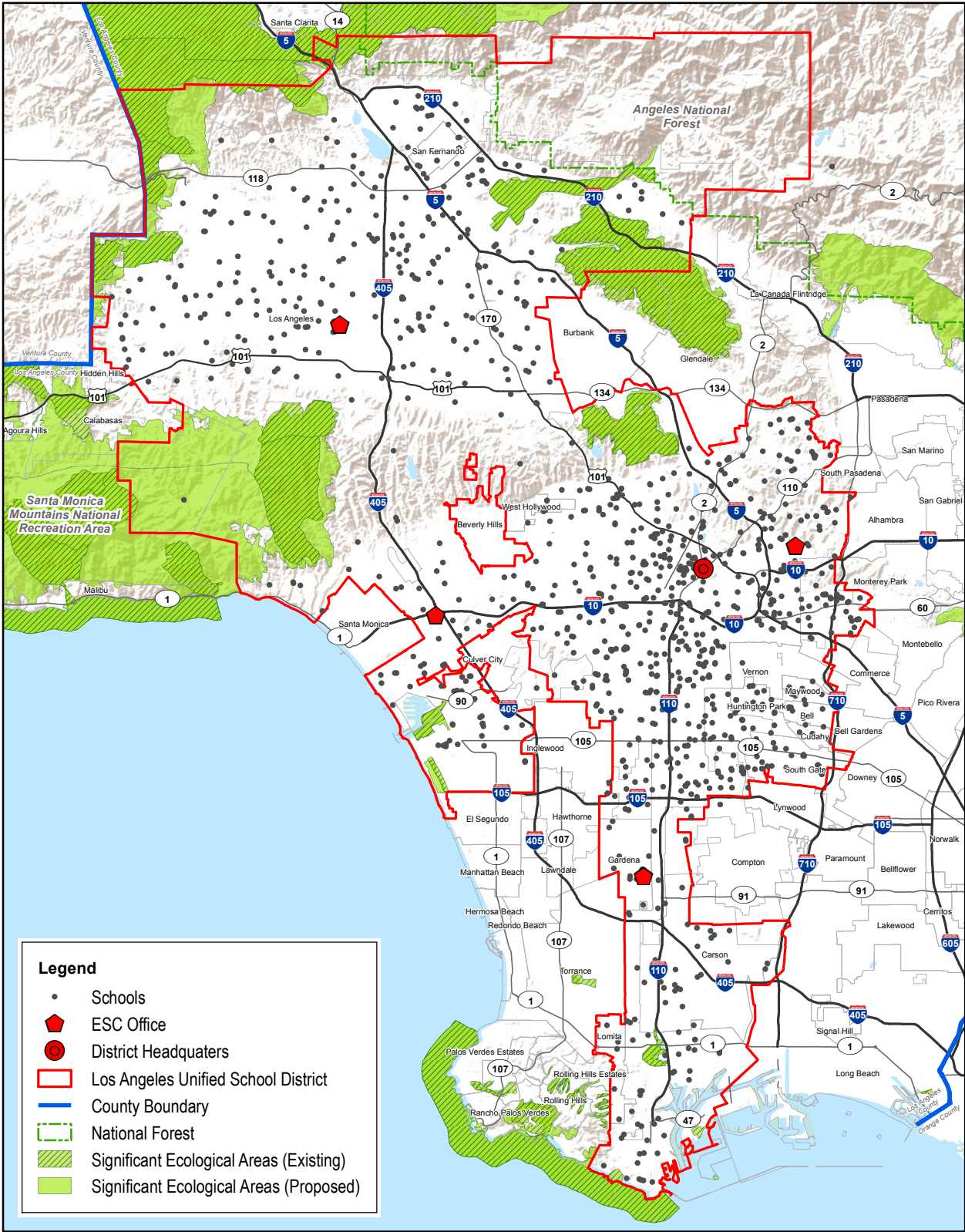
5. Environmental Analysis BIOLOGICAL RESOURCES

Coastal oak woodland. Occurs on flat to steep slopes that are often facing northwest at low elevations between 105 to 2,851 feet. It is dominated by coast live oak in the tree layer with various species of shrubs and annual grassland in the understory layer.

Annual grassland. Introduced annual grasses, including wild oats, soft chess, red brome, wild barley, true clovers, and many others. Remnants of native plants and grasses are also found in this habitat, including California poppy, purple needlegrass, and Idaho fescue. Characteristic wildlife associated with annual grassland include the western fence lizard, common garter snake, and western rattlesnake, California ground squirrel, California vole, badger, coyote, burrowing owl, short-eared owl, and western meadowlark.

³² California State Parks. 2012, September 28. Topanga State Park General Plan and Environmental Impact Report. Chapter Two: Existing Conditions and Issues. <http://www.parks.ca.gov/pages/21299/files/02finalgp-ch2.pdf>.

5. Environmental Analysis Figure 5.4-1 Significant Ecological Areas



Source: LA County DRP, 2013; ESRI, 2014

5. Environmental Analysis BIOLOGICAL RESOURCES

This page intentionally left blank.

5. Environmental Analysis

BIOLOGICAL RESOURCES

Sensitive Habitat

The CNDDDB was searched for sensitive resources documented as occurring in the District region on ~~September 2, 2015~~January 7, 2014. The 7.5-minute topographic quadrangles searched were Beverly Hills, Burbank, Calabasas, Canoga Park, Hollywood, Inglewood, Long Beach, Los Angeles, Malibu Beach, Oat Mountain, Pasadena, San Fernando, San Pedro, Simi Valley East, South Gate, Sunland, Topanga, Torrance, Van Nuys, and Venice.³³

Separate CNDDDB searches were run for each of the ~~Educational Service Center~~Local District areas on ~~February 19, 2014~~September 2, 2015. The quads searched ~~each local district area~~were:

- ~~Northwest ESC: Simi Valley East, Oat Mountain, San Fernando, Sunland, Calabasas, Canoga Park, Van Nuys, Burbank.~~
- ~~Northeast: Oat Mountain, San Fernando, Sunland, Condor Peak, Van Nuys, Burbank~~
- ~~West: Malibu Beach, Topanga, Beverly Hills, Hollywood, Burbank, Inglewood, Venice.~~
- ~~Central: Pasadena, Los Angeles, Hollywood, South Gate, Inglewood~~
- ~~East: Pasadena, Los Angeles, South Gate~~
- ~~South: South Gate, Long Beach, Torrance, San Pedro, Inglewood.~~
- ~~The quads searched for the East are some of the quads searched for the Central Local District; therefore, in the following discussion, Central and East are grouped together.~~
- ~~East ESC: Hollywood, Los Angeles, Pasadena, South Gate, Inglewood.~~
- ~~West ESC: Malibu Beach, Topanga, Beverly Hills, Hollywood, Burbank, Inglewood, Venice.~~
- ~~South ESC: South Gate, Long Beach, Torrance, San Pedro, Inglewood.~~

~~ESC~~Local District areas identified during a CNDDDB search are shown in Tables 5.4-2 and 5.4-3.

Sensitive Plants

³³ A small part of the northeast corner of the District (~~in the North ESC area~~) is in the Condor Peak quadrangle. The Condor Peak quadrangle was omitted from the CNDDDB search because the quadrangle is vacant land in the Angeles National Forest in the San Gabriel Mountains; there are no existing District schools in the quadrangle, and no existing or proposed urban residential uses that would create demand for new schools.

5. Environmental Analysis BIOLOGICAL RESOURCES

Sensitive plant species documented as occurring in or near the District are listed by Local District ~~ESC~~ area in Table 5.4-2; the habitat preference for each species is described in the table. Distribution maps from Calflora were checked to verify that each species occurs in the District region.³⁴

³⁴ Calflora is an internet database of California plants and the nonprofit organization that maintains the database.

5. Environmental Analysis BIOLOGICAL RESOURCES

Table 5.4-2 Sensitive Plant Species: Listing Status and Habitat Preference

Scientific Name Common Name	Listing Status			Habitat Preference ¹	ESG Local District Areas				
	Federal	State	CNPS		NW	NE	C, E	S	W
<i>Aphanisma blitoides</i> Aphanisma (annual herb)	None	None	1B.2	Coastal bluff scrub, coastal dunes, coastal scrub. On bluffs and slopes near the ocean in sandy or clay soils. In steep decline on the islands and the mainland. 1-305m.				S	
<i>Arctostaphylos glandulosa</i> <i>ssp. gabrielensis</i> San Gabriel manzanita (shrub)	None	None	1B.2	Chaparral. Rocky outcrops; can be dominant shrub where it occurs. 1500 m.		NE			
<i>Arenaria paludicola</i> marsh sandwort (perennial herb)	E	E	1B.1	Marshes and swamps. Growing up through dense mats of typha, juncus, scirpus, etc. In freshwater marsh. 10-170m.			C, E		W
<i>Astragalus brauntonii</i> Braunton's milk-vetch (perennial herb)	E	None	1B.1	Closed-cone coniferous forest, chaparral, coastal scrub, valley and foothill grassland. Recent burns or disturbed areas. 4-640m.	NW		C, E		W
<i>Astragalus pycnostachyus</i> <i>var. lanosissimus</i> Ventura Marsh milk-vetch (perennial herb)	E	E	1B.1	Coastal salt marsh. Within reach of high tide or protected by barrier beaches, more rarely near seeps on sandy bluffs. 1-35m.	N				W
<i>Astragalus tener</i> <i>var. titi</i> coastal dunes milk-vetch (perennial herb)	E	E	1B.1	Coastal bluff scrub, coastal dunes. Moist, sandy depressions of bluffs or dunes along and near the pacific ocean; one site on a clay terrace. 1-50m.	N		C, E	S	W
<i>Atriplex coulteri</i> Coulter's saltbush (perennial herb)	None	None	1B.2	Coastal bluff scrub, coastal dunes, coastal scrub, valley and foothill grassland. Ocean bluffs, ridgetops, as well as alkaline low places. 10-440m.				S	W
<i>Atriplex pacifica</i> South Coast saltscale (perennial herb)	None	None	1B.2	Coastal scrub, coastal bluff scrub, playas, chenopod scrub. Alkali soils. 1-500m.				S	
<i>Atriplex parishii</i> Parish's brittle-scale (perennial herb)	None	None	1B.1	Alkali meadows, vernal pools, chenopod scrub, playas. Usually on drying alkali flats with fine soils. 4-140m.	N	NE	E	S	W
<i>Atriplex serenana</i> <i>var. davidsonii</i> Davidson's saltscale (perennial herb)	None	None	1B.2	Coastal bluff scrub, coastal scrub. Alkaline soil. 3-250m.			C, E	S	W
<i>Baccharis malibuensis</i> Malibu baccharis (shrub)	None	None	1B.1	Coastal scrub, chaparral, cismontane woodland. In conejo volcanic substrates, often on exposed roadcuts. Sometimes occupies oak Woodland habitat. 150-260m.					W

5. Environmental Analysis
BIOLOGICAL RESOURCES

Table 5.4-2 Sensitive Plant Species: Listing Status and Habitat Preference

Scientific Name Common Name	Listing Status			Habitat Preference ¹	ESG Local District Areas				
	Federal	State	CNPS		NW	NE	C, E	S	W
<i>Berberis nevinii</i> Nevin's barberry (shrub)	E	E	1B.1	Chaparral, cismontane woodland, coastal scrub, riparian scrub. On steep, north-facing slopes or in low grade sandy washes. 290-1575m.	<u>NW</u>	<u>NE</u>	<u>C, E</u>		W
<i>California macrophylla</i> Round-leaved filaree (annual herb)	None	None	1B.1	Cismontane woodland, valley and foothill grassland. Clay soils. 15-1200m.	<u>NW</u>	<u>NE</u>	<u>C, E</u>		W
<i>Calochortus clavatus var. gracilis</i> Slender mariposa-lily (perennial herb)	None	None	1B.2	Chaparral, coastal scrub. Shaded foothill canyons; often on grassy slopes within other habitat. 420-760m	<u>NW</u>	<u>NE</u>	<u>E</u>		W
<i>Calochortus plummerae</i> Plummer's mariposa-lily (perennial herb)	None	None	4.2	Coastal scrub, chaparral, valley and foothill grassland, cismontane woodland, lower montane coniferous forest. Occurs on rocky and sandy sites, usually of granitic or alluvial material. Can be very common after fire. 90-1610m.	<u>NW</u>	<u>NE</u>	<u>C, E</u>		W
<i>Calystegia felix</i> <u>lucky morning-glory</u> (annual herb)	<u>None</u>	<u>None</u>	<u>3.1</u>	<u>Meadows and seeps, riparian scrub. Sometimes alkaline, alluvial. 30-215 m.</u>			<u>C</u>		
<i>Calystegia sepium ssp. binghamiae</i> Santa Barbara morning-glory (perennial herb)	None	None	1B.1	Coastal marshes. 0-30M.			<u>E</u>		W
<i>Castilleja gleasoni</i> <u>Mt. Gleason paintbrush</u> (perennial herb)	<u>None</u>	<u>None</u>	<u>1B.2</u>	<u>Lower montane coniferous forest, chaparral, pinyon and juniper woodland. On open flats or slopes in granitic soil. Restricted to the San Gabriel Mountains. 1160-2170 m.</u>		<u>NE</u>			
<i>Centromadia parryi ssp. australis</i> Southern tarplant (annual herb)	None	None	1B.1	Marshes and swamps (margins), valley and foothill grassland. Often in disturbed sites near the coast at marsh edges; also in alkaline soils sometimes with saltgrass.	<u>N</u>	<u>NE</u>	<u>C, E</u>	S	W
<i>Chaenactis glabriuscula var. orcuttiana</i> Orcutt's pincushion (annual herb)	None	None	1B.1	Coastal bluff scrub, coastal dunes. Sandy sites. 3-100m.					W
<i>Chenopodium littoreum</i> coastal goosefoot (annual herb)	None	None	1B.2	Coastal dunes. 10-30m.					W

5. Environmental Analysis BIOLOGICAL RESOURCES

Table 5.4-2 Sensitive Plant Species: Listing Status and Habitat Preference

Scientific Name Common Name	Listing Status			Habitat Preference ¹	ESG Local District Areas				
	Federal	State	CNPS		NW	NE	C, E	S	W
<i>Chloropyron maritimum</i> ssp. <i>maritimum</i> salt marsh bird's-beak (annual herb)	E	E	1B.2	Coastal salt marsh, coastal dunes. Limited to the higher zones of the salt marsh habitat. 0-30m.	N			S	W
<i>Chorizanthe parryi</i> var. <i>Fernandina</i> San Fernando Valley spineflower (annual herb)	C	E	1B.1	Coastal scrub. Sandy soils. 3-1035m.	NW	NE	E		W
<i>Chorizanthe parryi</i> var. <i>parryi</i> Parry's spineflower (annual herb)	None	None	1B.1	Coastal scrub, chaparral. Dry slopes and flats; sometimes at interface of 2 vegetation types, such as chaparral and oak woodland; dry, sandy soils. 40-1705m.			C, E		
<i>Crossosoma californicum</i> Catalina crossosoma (shrub)	None	None	1B.2	Chaparral, coastal scrub. On rocky sea bluffs, wooded canyons, and dry, open sunny spots on rocky clay. 0-500m				S	
<i>Deinandra minthornii</i> Santa Susana tarplant (shrub)	None	None	1B.2	Chaparral, coastal scrub. On sandstone outcrops and crevices, in shrubland. 280-760m.	NW	NE			W
<i>Dithyrea maritima</i> Beach spectaclepod (perennial herb)	None	T	1B.1	Coastal dunes, coastal scrub. Formerly more widespread in coastal habitats in so. Calif. Sea shores, on sand dunes, and sandy places near the shore. 3-50m.	N				W
<i>Dodecahema leptoceras</i> Slender-horned spineflower (annual herb)	E	E	1B.1	Chaparral, coastal scrub (alluvial fan sage scrub). Flood deposited terraces and washes; 200-760m.	NW	NE	C, E		W
<i>Dudleya blochmaniae</i> ssp. <i>blochmaniae</i> Blochman's dudleya (perennial herb)	None	None	1B.1	Coastal scrub, coastal bluff scrub, valley and foothill grassland. Open, rocky slopes; often in shallow clays over serpentine or in rocky areas with little soil. 5-450m.	NW				W
<i>Dudleya cymosa</i> ssp. <i>marcescens</i> marcescent dudleya (perennial herb)	T	Rare	1B.1	Chaparral. On sheer rock surfaces and rocky volcanic cliffs. 150-520m.					W
<i>Dudleya cymosa</i> ssp. <i>ovatifolia</i> Santa Monica dudleya (perennial herb)	T	None	1B.2	Chaparral, coastal scrub. In canyons on sedimentary conglomerates; primarily north-facing slopes. 210-500m.					W
<i>Dudleya multicaulis</i> Many-stemmed dudleya (perennial herb)	None	None	1B.2	Chaparral, coastal scrub, valley and foothill grassland. In heavy, often clayey soils or grassy slopes. 0-790m.	NW	NE	C, E		W

5. Environmental Analysis
BIOLOGICAL RESOURCES

Table 5.4-2 Sensitive Plant Species: Listing Status and Habitat Preference

Scientific Name Common Name	Listing Status			Habitat Preference ¹	ESG Local District Areas				
	Federal	State	CNPS		NW	NE	C, E	S	W
<i>Dudleya parva</i> Conejo dudleya (perennial herb)	T	None	1B.2	Coastal scrub, valley and foothill grassland. In clayey or volcanic soils on rocky slopes and grassy hillsides. 60-450m.	NW				
<i>Dudleya virens ssp. insularis</i> island green dudleya (perennial herb)	None	None	1B.2	Coastal bluff scrub, coastal scrub. Rocky soils. 5-300m.				S	
<i>Eryngium aristulatum var. parishii</i> San Diego button-celery (annual or perennial herb)	E	E	1B.1	Vernal pools, coastal scrub, valley and foothill grassland. San Diego mesa hardpan & claypan vernal pools & southern interior basalt flow vernal pools; usually surrounded by scrub. 20-620 m.			C		
<i>Harpagonella palmeri</i> Palmer's grapplinghook (annual herb)	None	None	4.2	Chaparral, coastal scrub, valley and foothill grassland. Clay soils; open grassy areas w/in shrubland. 15-830m.	NW	NE			
<i>Helianthus nuttallii ssp. parishii</i> Los Angeles sunflower (perennial herb)	None	None	1A	Marshes and swamps (coastal salt and freshwater). Historical from southern California. 5-1675m.			C, E		W
<i>Horkelia cuneata ssp. puberula</i> Mesa horkelia (perennial herb)	None	None	1B.1	Chaparral, cismontane woodland, coastal scrub. Sandy or gravelly sites. 70-810m.	N	NE	C, E		W
<i>Imperata brevifolia</i> California satintail (perennial grass)	None	None	2B.1	Coastal scrub, chaparral, riparian scrub, Mojavean scrub, meadows and seeps (alkali), Riparian scrub. Mesic sites, alkali seeps, riparian areas. 0-1215 m.		NE			
<i>Isocoma menziesii var. decumbens</i> decumbent goldenbush (shrub)	None	None	1B.2	Coastal scrub. Sandy soils; often in disturbed sites. 10-910m.					W
<i>Lasthenia glabrata ssp. coulteri</i> Coulter's goldfields (annual herb)	None	None	1B.1	Coastal salt marshes, playas, valley and foothill grassland, vernal pools. Usually found on alkaline soils in playas, sinks, and grasslands. 1-1400m.	NW		C, E	S	W
<i>Lepidium virginicum var. robinsonii</i> Robinson's pepper-grass (annual herb)	None	None	1B.2	Chaparral, coastal scrub. Dry soils, shrubland. 1-945m.	NW	NE	C, E		
<i>Lycium brevipes var. hassei</i> Santa Catalina Island desert-thorn (shrub)	None	None	1B.1	Coastal bluff scrub, coastal scrub. Coastal bluffs and slopes. 10-300m				S	

5. Environmental Analysis BIOLOGICAL RESOURCES

Table 5.4-2 Sensitive Plant Species: Listing Status and Habitat Preference

Scientific Name Common Name	Listing Status			Habitat Preference ¹	ESG Local District Areas				
	Federal	State	CNPS		NW	NE	C, E	S	W
<i>Malacothamnus davidsonii</i> Davidson's bush-mallow (shrub)	None	None	1B.2	Coastal scrub, riparian woodland, chaparral. Sandy washes. 180-855m.	NW	NE	E		W
<i>Monardella hypoleuca</i> ssp. <i>hypoleuca</i> white-veined monardella (perennial herb)	None	None	1B.3	Chaparral, cismontane woodland. Dry slopes. 50-1525m.	NW				W
<i>Nama stenocarpum</i> Mud nama (annual and perennial herb)	None	None	2B.2	Marshes and swamps. Lake shores, river banks, intermittently wet areas. 5-500m.	N			S	W
<i>Nasturtium gambelii</i> Gambel's water cress (perennial herb)	E	T	1B.1	Marshes and swamps. Freshwater and brackish marshes at the margins of lakes and along streams, in or just above the water level. 5-330m.			C, E		W
<i>Navarretia fossalis</i> spreading navarretia (annual herb)	T	None	1B.1	Vernal pools, chenopod scrub, marshes and swamps, playas. San Diego hardpan & San Diego claypan vernal pools; in swales & vernal pools, often surrounded by other habitat types. 30-1300m.			C, E	S	W
<i>Navarretia prostrata</i> prostrate vernal pool navarretia (annual herb)	None	None	1B.1	Coastal scrub, valley and foothill grassland, vernal pools. Alkaline soils in grassland, or in vernal pools. Mesic, alkaline sites. 15-700m.			C, E	S	W
<i>Nemacaulis denudata</i> var. <i>denudata</i> coast woolly-heads (annual herb)	None	None	1B.2	Coastal dunes. 0-100m.				S	
<i>Nolina cismontana</i> Peninsular nolina (shrub)	None	None	1B.2	Chaparral, coastal scrub. Primarily on sandstone and shale substrates; also known from gabbro. 140-1275m.	NW				
<i>Orcuttia californica</i> California Orcutt grass (annual herb)	E	E	1B.1	Vernal pools. 15-660m.	NW	NE	C, E	S	W
<i>Pentachaeta lyonii</i> Lyon's pentachaeta (annual herb)	E	E	1B.1	Chaparral, valley and foothill grassland. Edges of clearings in chaparral, usually at the margin between grassland and chaparral or edges of firebreaks. 30-630m.	NW			S	W
<i>Phacelia stellaris</i> Brand's star phacelia (annual herb)	C	None	1B.1	Coastal scrub, coastal dunes. Open areas. 5-1515m.			C, E	S	W
<i>Potentilla multijuga</i> Ballona cinquefoil (perennial herb)	None	None	1A	Meadows and seeps. brackish meadows. 0-2m.					W

5. Environmental Analysis
BIOLOGICAL RESOURCES

Table 5.4-2 Sensitive Plant Species: Listing Status and Habitat Preference

Scientific Name Common Name	Listing Status			Habitat Preference ¹	ESG Local District Areas				
	Federal	State	CNPS		NW	NE	C, E	S	W
<i>Pseudognaphalium leucocephalum</i> White rabbit-tobacco (perennial herb)	None	None	2B.2	Riparian woodland, cismontane woodland, coastal scrub, chaparral. Sandy, gravelly sites. 0-2100m.		<u>NE</u>	<u>C, E</u>		W
<i>Quercus dumosa</i> <i>Nuttall's scrub oak</i> (shrub)	<u>None</u>	<u>None</u>	1B.1	Closed-cone coniferous forest, chaparral, coastal scrub. Generally on sandy soils near the coast; sometimes on clay loam. 15-400 m.					W
<i>Ribes divarticulum var. parishii</i> Parish's gooseberry (shrub)	None	None	1A	Riparian woodland. Salix swales in riparian habitats. 65-100m.			<u>C, E</u>		
<i>Sidalcea neomexicana</i> Salt Spring checkerbloom (perennial herb)	None	None	2B.2	Alkali playas, brackish marshes, chaparral, coastal scrub, lower montane coniferous Forest, Mojavean desert scrub. Alkali springs and marshes. 0-1500m.	<u>N</u>				W
<i>Suaeda esteroa</i> estuary seablite (a perennial herb)	None	None	1B.2	Marshes and swamps. Coastal salt marshes in clay, silt, and sand substrates. 0-5m.				S	
<i>Symphotrichum defoliatum</i> San Bernardino aster (perennial herb)	None	None	1B.2	Meadows and seeps, marshes and swamps, coastal scrub, cismontane woodland, lower. Montane coniferous forest, grassland. Vernal mesic grassland or near ditches, streams and springs; disturbed areas. 2-2040m.			<u>C, E</u>	S	W
<i>Symphotrichum greatae</i> Greata's aster (perennial herb)	None	None	1B.3	Chaparral, cismontane woodland. Mesic canyons. 800-1500 m.	<u>NW</u>	<u>NE</u>	<u>C, E</u>		W

Source: California Department of Fish and Wildlife (CDFW). 2014, February 19. California Natural Diversity Database. <https://nrm.dfg.ca.gov/myaccount/login.aspx?ReturnUrl=%2fcnddb%2fview%2fquery.aspx>.

Notes:

Federal Status

- E Taxa listed as endangered
- T Taxa listed as threatened
- C Candidate for listing.

State Status

- E Taxa listed as endangered
- T Taxa listed as threatened

CNPS: California Native Plant Society Classifications

- 1A Plants presumed by CNPS to be extinct in California
- 1B Plants considered by CNPS to be rare or endangered in California and elsewhere
- 2 Plants considered by CNPS to be rare, threatened or endangered in California, but which are more common elsewhere
- 3 Review list of plants suggested by CNPS for consideration as endangered but about which more information is needed.
- 4 Watch list of plants of limited distribution whose status should be monitored.

Threat Ranks

- 0.1-Seriously threatened in California (high degree/immediacy of threat)
- 0.2-Fairly threatened in California (moderate degree/immediacy of threat)
- 0.3-Not very threatened in California (low degree/immediacy of threats or no current threats known)

¹ 1 meter is 3.28 feet; so equivalents of metric elevations are rounded to the nearest foot.
10 m 33 ft

5. Environmental Analysis BIOLOGICAL RESOURCES

Table 5.4-2 Sensitive Plant Species: Listing Status and Habitat Preference

Scientific Name Common Name	Listing Status			Habitat Preference ¹	ESG Local District Areas					
	Federal	State	CNPS		NW	NE	C, E	S	W	
25 m 82 ft										
50 m 164 ft										
100 m 328 ft										
250 m 820 ft										
500 m 1,640 ft										
1,000 m 3,280 ft										
Xeric: dry soil moisture condition										
Mesic: soil moisture intermediate between dry (xeric) and wet (hydic)										
Hydic: wet soil moisture condition										

No sensitive plants in native habitats are anticipated to occur on LAUSD campuses.

Sensitive Wildlife

Sensitive species documented as occurring in or near the District, as identified in the CNDDDB searches described above, are listed in Table 5.4-3.

Table 5.4-3 Sensitive Animal Species: Listing Status and Habitat Preference

Scientific Name Common Name	Status		Habitat Preference	ESG Local District Area				
	Federal	State		NW	NE	C, E	S	W
Invertebrates								
<i>Aglaothorax longipennis</i> Santa Monica shieldback katydid	None	None	Occur nocturnally in chaparral and canyon stream bottom vegetation, in the Santa Monica Mtns of southern California. Inhabit introduced iceplant and native chaparral plants.					W
<i>Brennania belkini</i> Belkin's dune tabanid fly	None	None	Coastal sand dunes of southern California					W
<i>Carollela busckana</i> Busck's gallmoth	None	None	None listed			E		W
<i>Cicindela gabbii</i> western tidal-flat tiger beetle	None	None	Inhabits estuaries and mudflats along the coast of southern California. Generally found on dark-colored mud in the lower zone; occasionally found on dry saline Flats of estuaries.				S	
<i>Cicindela hirticollis gravida</i> sandy beach tiger beetle	None	None	None listed				S	W
<i>Cicindela latesignata latesignata</i> western beach tiger beetle	None	None	Mudflats and beaches in coastal southern California				S	

5. Environmental Analysis
BIOLOGICAL RESOURCES

Table 5.4-3 Sensitive Animal Species: Listing Status and Habitat Preference

Scientific Name Common Name	Status		Habitat Preference	ESG Local District-Area				
	Federal	State		NW	NE	C, E	S	W
<i>Cicindela senilis frosti</i> senile tiger beetle	None	None	Inhabits marine shoreline, from central California coast south to salt marshes of San Diego. Also found at Lake Elsinore Inhabits dark-colored mud in the lower zone and dried salt pans in the upper zone.					W
<i>Coelus globosus</i> globose dune beetle	None	None	Inhabitant of coastal sand dune habitat; erratically distributed from ten mile creek in Mendocino County south to Ensenada, Mexico. Inhabits foredunes and sand hummocks; it burrows beneath the sand surface and is most common beneath dune vegetation.	N				W
<i>Danaus plexippus</i> monarch butterfly	None	None	Winter roost sites extend along the coast from northern Mendocino to Baja California, Mexico. Roosts located in wind-protected tree groves (eucalyptus, monterey pine, cypress), with Nectar and water sources nearby.	NW	NE		S	W
<i>Eucosma henei</i> Henne's eucosman moth	None	None	Endemic to the El Segundo dunes (type locality), Los Angeles County. Larval foodplant is phacelia ramosissima var austrolitoralis; larvae can be found on Woody stems and upper root parts.					W
<i>Euphilotes battoides allyni</i> El Segundo blue butterfly	E	None	Restricted to remnant coastal dune habitat in southern California. Hostplant is eriogonum parvifolium; larvae feed only on the flowers and seeds; used by adults as major nectar source.					W
<i>Euphydryas editha quino</i> Quino checkerspot butterfly	E	None	Sunny openings within chaparral & coastal sage shrublands in parts of Riverside & San Diego counties. Hills & mesas near the coast. Need high densities of food plants <i>Plantago erecta</i> , <i>P. insularis</i> , <i>Orthocarpus purpureus</i>					
<i>Glaucopsyche lygdamus palosverdesensis</i> Palos Verdes blue butterfly	E	None	Restricted to the cool, fog-shrouded, seaward side of Palos Verdes Hills, Los Angeles County. Host plant is <i>Astragalus trichopodus</i> var. <i>lonchus</i> (locoweed).				S	
<i>Onychobaris langei</i> Lange's El Segundo Dune weevil	None	None	Known from El Segundo dunes.					W
<i>Panoquina errans</i> wandering (=saltmarsh) skipper	None	None	Southern California coastal salt marshes. Requires moist saltgrass for larval development.				S	
<i>Socalchemmis gertschi</i> Gertsch's socialchemmis spider	None	None	Known from only 2 localities in Los Angeles County: Brentwood (type locality) and Topanga Canyon.	NW W				W
<i>Streptocephalus woottoni</i> Riverside fairy shrimp	E	None	Endemic to W. Riv, Orange & San Diego counties in areas of tectonic swales/earth slump basins in grassland & coastal sage	NW				

5. Environmental Analysis
 BIOLOGICAL RESOURCES

Table 5.4-3 Sensitive Animal Species: Listing Status and Habitat Preference

<i>Scientific Name</i> <i>Common Name</i>	<i>Status</i>		<i>Habitat Preference</i>	<i>ESG Local District Area</i>				
	<i>Federal</i>	<i>State</i>		<i>NW</i>	<i>NE</i>	<i>C, E</i>	<i>S</i>	<i>W</i>
			scrub. Inhabit seasonally astatic pools filled by winter/spring rains. Hatch in warm water later in the season.					

5. Environmental Analysis
BIOLOGICAL RESOURCES

Table 5.4-3 Sensitive Animal Species: Listing Status and Habitat Preference

Scientific Name Common Name	Status		Habitat Preference	ESCLocal District-Area				
	Federal	State		NW	NE	C, E	S	W
<i>Trigonoscuta dorothea</i> Dorothea's El Segundo Dune weevil	None	None	Coastal sand dunes in Los Angeles County					W
<i>Tryonia imitator</i> mimic tryonia (California brackishwater snail)	None	None	Inhabits coastal lagoons, estuaries and salt marshes, from Sonoma County south to San Diego County. Found only in permanently submerged areas in a variety of sediment types; able to Withstand a wide range of salinities.				S	W
Fish								
<i>Catostomus santaanae</i> Santa Ana sucker	T	None	Endemic to Los Angeles basin south coastal streams. Habitat generalists, but prefer sand-rubble-boulder bottoms, cool, clear water & algae.	NW	NE			
<i>Eucyclogobius newberryi</i> tidewater goby	E	None	<u>Brackish water habitats along the Calif coast from Agua Hedionda lagoon, San Diego co. to The mouth of the Smith river.</u> <u>Found in shallow lagoons and lower stream reaches, they need fairly still but not stagnant water & high oxygen levels.</u>					W
<i>Gila orcutti</i> Arroyo chub	None	SC	Los Angeles Basin south coastal streams. Slow water stream sections with mud or sand bottoms. Feeds heavily on aquatic vegetation & associated invertebrates.	NW	NE			W
<i>Oncorhynchus mykiss irideus</i> southern steelhead – southern California DPS	E	None	Fed listing refers to pops from Santa Maria river south to southern extent of range (San Mateo creek in San Diego Co.) Southern steelhead likely have greater physiological tolerances to warmer water & more variable conditions.					W
<i>Rhinichthys osculus</i> ssp. Santa Ana speckled dace	None	SC	Headwaters of the Santa Ana and San Gabriel rivers. May be extirpated from the Los Angeles River system. Requires permanent flowing streams with summer water temps of 17-20° c. Usually inhabits shallow cobble and gravel riffle	NW	NE			
<i>Siphateles bicolor mohavensis</i> Mohave tui chub			Endemic to the Mojave River Basin, adapted to alkaline, mineralized waters. Needs deep pools, ponds, or slough-like areas. Needs vegetation for spawning.				S	
Amphibians								
<i>Anaxyrus californicus</i> Arroyo toad	E	SC	Semi-arid regions near washes or intermittent streams, including valley-foothill and desert riparian, desert wash, etc. Rivers with sandy banks, willows, cottonwoods, and sycamores; loose, gravelly areas of streams in drier parts of range.	NW				

5. Environmental Analysis BIOLOGICAL RESOURCES

Table 5.4-3 Sensitive Animal Species: Listing Status and Habitat Preference

Scientific Name Common Name	Status		Habitat Preference	ESG Local District-Area				
	Federal	State		NW	NE	C, E	S	W
<i>Plestiodon skiltonianus interparietalis</i> Coronado Island skink	None	SC	Grassland, chaparral, pinon-juniper & juniper sage woodland, pine-oak & pine forests in coast ranges of southern California. Found in rocky areas close to streams & on dry hillsides.	N				
<i>Rana draytonii</i> California red-legged frog	T	SC	Lowlands & foothills in or near permanent sources of deep water with dense, shrubby or emergent riparian vegetation. Requires 11-20 weeks of permanent water for larval development. Must have access to estivation habitat.	NW				
<i>Rana muscosa</i> Southern mountain yellow-legged frog	E	E	Federal listing refers to populations in the San Gabriel, San Jacinto & San Bernardino Mountains only. Always encountered within a few feet of water. Tadpoles may require 2 – 4 yrs. to complete their aquatic development.	NW	NE	C, E		
<i>Spea hammondi</i> Western spadefoot	None	SC	Occurs primarily in grassland habitats, but can be found in valley-foothill hardwood woodlands. Vernal pools are essential for breeding and egg-laying.	NW	NE			
<i>Taricha tarosa tarosa</i> Coast Range newt	None	SC	Coastal drainages from Mendocino County to San Diego County. Lives in terrestrial habitats & will migrate over 1 km to breed in ponds, reservoirs & slow moving streams.		NE	C, E		
Reptiles								
<i>Anniela pulchra pulchra</i> Silvery legless lizard	None	SC	Sandy or loose loamy soils under sparse vegetation. Soil moisture is essential. They prefer soils with a high moisture content.	NW	NE	E	S	W
<i>Aspidoscelis tigris stejnegeri</i> Coastal whiptail	None	None	Found in deserts & semiarid areas with sparse vegetation and open areas. Also found in woodland & riparian areas. Ground may be firm soil, sandy, or rocky.	NW	NE			W
<i>Diadophis punctatus modestus</i> San Bernardino ringneck snake	None	None	Most common in open, relatively rocky areas. Often in somewhat moist microhabitats near intermittent streams. Avoids moving through open or barren areas by restricting movements to areas of surface litter or herbaceous veg.					W
<i>Emys marmorata</i> Western pond turtle	None	SC	A thoroughly aquatic turtle of ponds, marshes, rivers, streams & irrigation ditches, usually with aquatic vegetation. Need basking sites and suitable (sandy banks or grassy open fields) upland habitat up to 0.5 km from water for egg-laying	NW	NE	C, E		W

5. Environmental Analysis
BIOLOGICAL RESOURCES

Table 5.4-3 Sensitive Animal Species: Listing Status and Habitat Preference

Scientific Name Common Name	Status		Habitat Preference	ESCLocal District-Area				
	Federal	State		NW	NE	C, E	S	W
<i>Lampropeltis zonata</i> California mountain kingsnake (San Diego population)	None	SC	Restricted to the San Gabriel and San Jacinto mountains of southern California. Inhabits a variety of habitats, including valley-foothill hardwood, coniferous, chaparral, riparian, and wet meadows.					W
<i>Phrynosoma blainvillii</i> Coast horned lizard	None	SC	Frequents a wide variety of habitats, most common in lowlands along sandy washes with scattered low bushes. Open areas for sunning, bushes for cover, patches of loose soil for burial & abundant supply of ants & other insects.	NW	NE	C, E	S	W
<i>Thamnophis hammondi</i> Two-striped garter snake	None	SC	Coastal California from vicinity of Salinas to northwest Baja California. From sea to about 7,000 ft elevation. Highly aquatic, found in or near permanent fresh water. Often along streams with rocky beds and riparian growth.	NW	NE			W
Birds								
<i>Agelaius tricolor</i> Tricolored blackbird	None	SC	Highly colonial species, most numerous in central valley & vicinity. Largely endemic to California. Requires open water, protected nesting substrate, & foraging area with insect prey within a few km of the colony.	NW			S	
<i>Aquila chrysaetos</i> Golden eagle	None	FP	Rolling foothills, mountain areas, sage-juniper flats, & desert. Cliff-walled canyons provide nesting habitat in most parts of range; also, large trees in open areas.	NW				W
<i>Athene cunicularia</i> Burrowing owl	None	SC	Open, dry annual or perennial grasslands, deserts & scrublands characterized by low-growing vegetation. Subterranean nester, dependent upon burrowing mammals, most notably, the California ground squirrel.	NW	NE	C, E	S	W
<i>Buteo swainsoni</i> Swainson's hawk	None	T	Breeds in grasslands with scattered trees, juniper-sage flats, riparian areas, savannahs, & agricultural or ranch lands with groves or lines of trees. Requires adjacent suitable foraging areas such as grasslands, or alfalfa or grain fields supporting rodent populations.	NW	NE			W
<i>Charadrius alexandrinus nivosus</i> Western snowy plover	T	SC	Sandy beaches, salt pond levees & shores of large alkali lakes					W
<i>Coccyzus americanus occidentalis</i> Western yellow-billed cuckoo	C	E	Riparian forest nester, along the broad, lower flood-bottoms of larger river systems. Nests in riparian jungles of willow, often mixed with cottonwoods, w/lower story of blackberry, nettles, or wild grape.	NW	NE	C, E		

5. Environmental Analysis BIOLOGICAL RESOURCES

Table 5.4-3 Sensitive Animal Species: Listing Status and Habitat Preference

Scientific Name Common Name	Status		Habitat Preference	ESG Local District Area				
	Federal	State		NW	NE	C, E	S	W
<i>Elanus leucurus</i> White-tailed kite	None	FP	Rolling foothills and valley margins with scattered oaks & river bottomlands or marshes next to deciduous woodland. Open grasslands, meadows, or marshes for foraging close to isolated, dense-topped trees for nesting and perching.	NW				
<i>Empidonax traillii extimus</i> Southwestern willow flycatcher	E	E	Riparian woodlands in southern California		NE	E	S	W
<i>Eremophila alpestris aetia</i> California horned lark	None	None	Coastal regions, chiefly from Sonoma co. to San Diego co. Also main part of San Joaquin Valley & east to foothills. Short grass prairie, "bald" hills, mountain meadows, open coastal plains, fallow grain fields, alkali flats.					
<i>Falco peregrinus anatum</i> Peregrine falcon	None	FP	Peregrine falcons have recently begun to colonize urban areas because tall buildings are suitable for nesting by this species, and because of the abundance of pigeons as prey. ³⁵			C, E		W
<i>Laterallus jamaicensis coturniculus</i> California black rail	None	T	Inhabits freshwater marshes, wet meadows & shallow margins of saltwater marshes bordering larger bays. Needs water depths of about 1 inch that does not fluctuate during the year & dense vegetation for nesting habitat.					W
<i>Passerculus sandwichensis beldingi</i> Belding's savannah sparrow	None	E	Inhabits coastal salt marshes, from Santa Barbara south through San Diego County. Nests in salicornia on and about margins of tidal flats.					W
<i>Pelecanus occidentalis californicus</i> California brown pelican	None	FP	Colonial nester on coastal islands just outside the surf line. Nests on coastal islands of small to moderate size which afford immunity from attack by ground-dwelling predators. Roosts communally.				S	W
<i>Polioptila californica californica</i> Coastal California gnatcatcher	T	SC	Obligate, permanent resident of coastal sage scrub below 2500 ft in southern California. Low, coastal sage scrub in arid washes, on mesas & slopes. Not all areas classified as coastal sage scrub are occupied.	NW	NE	C, E	S	W
<i>Sternula antillarum browni</i> California least tern	E	E	Nests along the coast from San Francisco Bay south to Northern Baja California. Colonial breeder on bare or sparsely vegetated, flat substrates: sand beaches, alkali flats, landfills, or paved areas.				S	W

³⁵ Potter, M. 2002. *Falco peregrinus*, Animal Diversity Web. http://animaldiversity.ummz.umich.edu/accounts/Falco_peregrinus/.

5. Environmental Analysis
 BIOLOGICAL RESOURCES

Table 5.4-3 Sensitive Animal Species: Listing Status and Habitat Preference

Scientific Name Common Name	Status		Habitat Preference	ESG Local District Area				
	Federal	State		NW	NE	C, E	S	W
<i>Vireo bellii pusillus</i> Least Bell's vireo	E	E	Summer resident of southern California in low riparian in vicinity of water or in dry river bottoms; below 2000 ft. Nests placed along margins of bushes or on twigs projecting into pathways, usually willow, baccharis, mesquite.	<u>NW</u>	<u>NE</u>	<u>C, E</u>		W

5. Environmental Analysis BIOLOGICAL RESOURCES

Table 5.4-3 Sensitive Animal Species: Listing Status and Habitat Preference

Scientific Name Common Name	Status		Habitat Preference	ESCLocal District-Area				
	Federal	State		NW	NE	C, E	S	W
Mammals								
<i>Antrozous pallidus</i> Pallid bat	None	SC	Deserts, grasslands, shrublands, woodlands & forests. Most common in open, dry habitats with rocky areas for roosting. Roosts must protect bats from high temperatures. Very sensitive to disturbance of roosting sites.	NW	NE	C, E		W
<i>Corynorhinus townsendii</i> Townsend's big-eared bat	None	SC	Throughout California in a wide variety of habitats. Most common in mesic sites. Roosts in the open, hanging from walls & ceilings. Roosting sites limiting. Extremely sensitive to human disturbance.	NW	NE			
<i>Euderma maculatum</i> Spotted bat	None	SC	Occupies a wide variety of habitats from arid deserts and grasslands through mixed Conifer forests. Feeds over water and along washes. Feeds almost entirely on moths. Needs rock crevices in cliffs or caves for roosting.					W
<i>Eumops perotis californicus</i> Western mastiff bat	None	SC	Many open, semi-arid to arid habitats, including conifer & deciduous woodlands, coastal scrub, grasslands, chaparral etc. Roosts in crevices in cliff faces, high buildings, trees & tunnels.	NW	NE	C, E	S	W
<i>Lasiorycteris noctivagans</i> Silver-haired bat	None	None	Mainly a coastal and montane forest dweller feeding over streams, ponds & open brushy areas. Roosts in hollow trees, beneath exfoliating bark, abandoned woodpecker holes & rarely under rocks. Needs drinking water.	NW	NE	C, E	S	W
<i>Lasiurus blossevillii</i> Western red bat	None	SC	Roosts primarily in trees, 2-40 ft above ground, from sea level up through mixed conifer forests. Prefers habitat edges and mosaics; trees protected from above and open below.					W
<i>Lasiurus cinereus</i> Hoary bat	None	None	Prefers open habitats or habitat mosaics, with access to trees for cover & open areas or habitat edges for feeding. Roosts in dense foliage of medium to large trees. Requires water.	NW	NE	C, E		W
<i>Lasiurus xanthinus</i> Western yellow bat	None	SC	Found in valley foothill riparian, desert riparian, desert wash, and palm oasis habitats. Roosts in trees, particularly palms. Forages over water and among trees.		NE	C, E		W
<i>Lepus californicus bennettii</i> San Diego black-tailed jackrabbit	None	SC	Intermediate canopy stages of shrub habitats & open shrub/herbaceous & tree/herbaceous edges. Coastal sage scrub habitats in southern California.	N	NE			

5. Environmental Analysis
BIOLOGICAL RESOURCES

Table 5.4-3 Sensitive Animal Species: Listing Status and Habitat Preference

Scientific Name Common Name	Status		Habitat Preference	ESG Local District Area				
	Federal	State		NW	NE	C, E	S	W
<i>Macrotus californicus</i> California leaf-nosed bat	None	SC	Desert riparian, desert wash, desert scrub, desert succulent scrub, alkali scrub and palm oasis habitats. Needs rocky, rugged terrain with mines or caves for roosting.	NW	NE			
<i>Microtus californicus stephensi</i> south coast marsh vole	None	SC	Tidal marshes in Los Angeles, Orange and southern Ventura counties.			E	S	W
<i>Myotis ciliolabrum</i> western small-footed myotis a species of vesper bat	None	None	Wide range of habitats mostly arid wooded & brushy uplands near water. Seeks cover in Caves, buildings, mines & crevices. Prefers open stands in forests and woodlands. Requires drinking water. Feeds on a wide variety of small flying insects.					W
<i>Myotis yumanensis</i> Yuma myotis a species of vesper bat	None	None	Optimal habitats are open forests and woodlands with sources of water over which to feed. Distribution is closely tied to bodies of water.					W
<i>Neotoma lepida intermedia</i> San Diego desert woodrat	None	SC	Coastal scrub of southern California from San Diego County to San Luis Obispo County. Moderate to dense canopies preferred. They are particularly abundant in rock outcrops, rocky cliffs & slopes.	N	NE	E	S	W
<i>Nyctinomops femorosaccus</i> Pocketed free-tailed bat	None	SC	Variety of arid areas in southern California; pine-juniper woodlands, desert scrub, palm oasis, desert wash, desert ripa Rocky areas with high cliffs.			C, E	S	W
<i>Nyctinomops macrotis</i> Big free-tailed bat	None	SC	Low-lying arid areas in southern California. Need high cliffs or rocky outcrops for roosting sites.		NE	C, E	S	W
<i>Onychomys torridus ramona</i> Southern grasshopper mouse	None	SC	Desert areas, especially scrub habitats with friable soils for digging. Prefers low to moderate shrub cover.	N	NE	C, E		W
<i>Perognathus longimembris brevinasus</i> Los Angeles pocket mouse	None	SC	Lower elevation grasslands & coastal sage communities in and around the Los Angeles basin. Open ground with fine sandy soils.	NW	NE			
<i>Perognathus longimembris pacificus</i> Pacific pocket mouse	E	SC	Inhabits the narrow coastal plains from the Mexican Border north to El Segundo, Los Angeles Co. Seems to prefer soils of fine alluvial sands near the ocean, but much remains to be learned.				S	W
<i>Sorex ornatus salicornicus</i> southern California saltmarsh shrew	None	SC	Coastal marshes in Los Angeles, Orange And Ventura Counties. Requires dense vegetation and woody debris for cover					W

5. Environmental Analysis

BIOLOGICAL RESOURCES

Table 5.4-3 Sensitive Animal Species: Listing Status and Habitat Preference

Scientific Name Common Name	Status		Habitat Preference	ESG Local District Area				
	Federal	State		NW	NE	C, E	S	W
<i>Taxidea taxus</i> American badger	None	SC	Most abundant in drier open stages of most shrub and forest habitats with crumbly soils. Needs sufficient food, friable soils & open, uncultivated ground. Preys on burrowing rodents. Digs burrows.		NE	C, E	S	W

Source: California Department of Fish and Wildlife (CDFW). 2014, February 19. California Natural Diversity Database. <https://nrm.dfg.ca.gov/myaccount/login.aspx?ReturnUrl=%2fcnddb%2fview%2fquery.aspx>.

Federal Status

E Listed as Endangered
T Listed as Threatened
C Candidate for listing

State Status

E Listed as Endangered
T Listed as Threatened
SC State Species of Special Concern
FP California Fully Protected Species

With the exception of incidental perching or roosting on vegetation and buildings by birds and bats, sensitive animal species that could occur on LAUSD campuses are limited to birds and bats that nest or roost on or in buildings (see Table 5.4-4). Use of existing campuses would be very limited; for instance, maintenance of turf precludes habitation by rodents that could be preyed upon by birds of prey.

Table 5.4-4 Sensitive Animal Species That Could Occur on LAUSD Campuses

Species: Scientific name Common name	Status	Habitat Preference
Species with moderate potential to occur on District campuses		
Peregrine falcon <i>Falco peregrinus anatus</i>	FP	Peregrine falcons have recently begun to colonize urban areas because tall buildings are suitable for nesting by this species, and because of the abundance of pigeons as prey. ³⁶ This species' range includes the District. ³⁷
Western mastiff bat <i>Eumops perotis californicus</i>	SSC	Roosts in crevices in cliff faces, high buildings, trees and tunnels. This species' range includes the District, and several colonies have been reported from buildings in the Los Angeles Basin. ^{38,39}
Western small-footed myotis <i>Myotis ciliolabrum</i>	None	This bat seeks cover in caves, buildings, mines, crevices, and occasionally under bridges and under bark. ⁴⁰ This species' range includes the District. ⁴¹
Yuma myotis <i>Myotis yumanensis</i>	None	The Yuma myotis roosts in buildings, mines, caves, or crevices. ⁴² Yuma myotis' range includes the District. ⁴³

Source: California Department of Fish and Wildlife (CDFW). 2014, February 19. California Natural Diversity Database. <https://nrm.dfg.ca.gov/myaccount/login.aspx?ReturnUrl=%2fcnddb%2fview%2fquery.aspx>.

³⁶ Potter, M. 2002. *Falco peregrinus*, Animal Diversity Web. http://animaldiversity.ummz.umich.edu/accounts/Falco_peregrinus/.

³⁷ CDFW. 2008, March 19. Peregrine Falcon: B129. <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=1688&inline=1>.

³⁸ CDFW. 2008, February 26. Western mastiff bat life history account. <http://www.dfg.ca.gov/biogeodata/cwhr/cawildlife.aspx>.

³⁹ CDFW. 2008, March 13. Western mastiff bat: M042. <http://www.dfg.ca.gov/biogeodata/cwhr/cawildlife.aspx>.

⁴⁰ CDFW. 2008, February 26. Western small-footed myotis life history account. <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=2331&inline=1>.

⁴¹ CDFW. 2008, March 13. Western small-footed myotis: M029. <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=2332&inline=1>.

⁴² CDFW. 2008, February 26. Yuma myotis life history account. <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=2319&inline=1>.

⁴³ CDFW. 2008, March 13. Yuma myotis: M023. <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=2320&inline=1>.

Original Map 1988-1990; Revisions 195 & 2000. <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=2320&inline=1>.

5. Environmental Analysis
BIOLOGICAL RESOURCES

Sensitive Natural Communities

Sensitive natural communities documented on the CNDDDB as occurring in or near the District are described below in Table 5.4-5.

Table 5.4-5 Sensitive Natural Communities In and Near the District

Natural Community	Description	ESCLocal District Areas				
		NW	NE	C, E	S	W
California Walnut Woodland	Open tree canopy locally dominated by <i>Juglans californica</i> (California black walnut). The open tree canopy allows development of a grassy understory which is comprised of introduced winter-active annuals in most sites. On relatively moist, fine-textured soils of valley slopes and bottoms, as well as encircling rocky outcrops.	NW	NE	C, E		W
Riversidian Alluvial Fan Sage Scrub	A type of coastal sage scrub on dry sites south of Point Conception. Typical stands are fairly open and dominated by California sagebrush (<i>Artemisia californica</i>), California buckwheat (<i>Eriogonum fasciculatum</i>), and foxtail brome (<i>Bromus rubens</i>). Typically on dry sites such as steep slopes, severely drained soils, or clays that release stored soil moisture only slowly	NW	NE			
Southern California Arroyo Chub/Santa Ana Sucker Stream	Small to medium sized streams that flow year-round and may vary in depth from a few inches to over three feet deep. They favor cool (<72°F) flowing water where gravel, rubble, and boulder substrates are present.	N	NE			
Southern California Coastal Lagoon	Characterized by non-woody salt-tolerant plant species adapted to life in water and/or in saturated soils forming moderate to dense cover and up to three feet tall. Most species are active in summer, dormant in winter. Usually segregated horizontally with <i>Spartina</i> (cordgrass) nearer the open water, <i>Salicornia</i> (pickleweed) at mid-littoral elevations, and a richer mixture closer to high ground. Usually found along sheltered inland margins of bays, lagoons, and estuaries. These soils are flooded by salt water for at least part of each year.					W
Southern California Steelhead Stream	Within a stream resident rainbows and freshwater phase steelhead have in-stream habitat preferences generally determined by size. The smallest fish are mostly found in riffles, medium sized fish in runs, and larger fish predominantly in pools.					W
Southern Coast Live Oak Riparian Forest	Open to locally dense evergreen riparian woodlands dominated by <i>Quercus agrifolia</i> (coast live oak). This type appears to be richer in herbs and poorer in understory shrubs than other riparian communities. Bottomlands and outer floodplains along larger streams, on fine-grained, rich alluvium.	NW	NE	C, E		W
Southern Coastal Bluff Scrub	Most plants woody and/or succulent, and up to 6.5 feet tall. Most growth and flowering occur from late winter through spring. Exposed to nearly constant winds with high salt content. Soil usually rocky and poorly developed.				S	
Southern Coastal Salt Marsh	See <i>Southern California Coastal Lagoon</i> above.					W
Southern Cottonwood Willow Riparian Forest	Tall, open, broadleaved winter-deciduous riparian forests dominated by Fremont cottonwood (<i>Populus fremontii</i>), black cottonwood (<i>Populus trichocarpa</i>), and several tree willows. Understories usually are shrubby willows. Frequently flooded lands along rivers and streams. The dominant species require moist, bare mineral soil for germination and establishment. This is provided after flood waters recede, leading to uniform-aged stands of trees.	NW	NE	E		W

5. Environmental Analysis

BIOLOGICAL RESOURCES

Table 5.4-5 Sensitive Natural Communities In and Near the District

Natural Community	Description	ESCLocal District Areas				
		NW	NE	C, E	S	W
Southern Dune Scrub	A dense, coastal scrub community of scattered shrubs and nonwoody flowering plants, generally less than three feet tall. Restricted to the coast on relatively stabilized backdune slopes, ridges, and flats. Only remaining area left in mainland southern California is El Segundo Dunes in Los Angeles County. ⁴⁴					W
Southern Mixed Riparian Forest	No description available. See <i>Southern Cottonwood Willow Riparian Forest</i> above.	NW	NE			
Southern Riparian Scrub	A scrubby streamside thicket, varying from open to impenetrable, dominated by any of several willows. Relatively fine-grained sand and gravel bars that are closed to river channels and therefore close to ground water.	NW				
Southern Sycamore Alder Riparian Woodland	A tall, open, broadleaved, winter-deciduous streamside woodland dominated by California sycamore (<i>Platanus racemosa</i>), and often also white alder (<i>Alnus rhombifolia</i>). These stands seldom form closed canopy forests, and even may appear as trees scattered in a shrubby thicket of deciduous species with thick leaves. Very rocky streambeds subject to seasonally high-intensity flooding.	NW	NE	C, E		W
Southern Willow Scrub	Dense, broadleaved, winter-deciduous riparian thickets dominated by several willow (<i>Salix</i>) species, with scattered emergent Fremont cottonwood and California sycamore. Most stands are too dense to allow much understory development. Loose, sandy or fine gravelly alluvium deposited near stream channels during flood flows.	NW	NE			
Valley Needlegrass Grassland	A midheight (to 2 feet) grassland dominated by perennial purple needlegrass (<i>Nassella pulchra</i>). Native and introduced annuals occur between the perennials. Usually on fine-textured (often clay) soils, moist or even waterlogged during winter, but very dry in summer.	NW				
Valley Oak Woodland	Open, grassy-understoried savanna. Valley oak (<i>Quercus lobata</i>) is usually the only tree present. On deep, well-drained alluvial soils, usually in valley bottoms.	NW	NE			
Walnut Forest	No description available. See <i>California Walnut Woodland</i> above. Forests generally have denser tree cover than woodlands.			C, E		

Sources: California Gap Analysis Project, University of California Santa Barbara Biogeography Lab. 2012, December 9. Community Types Mapped for the California Gap Analysis Project. http://www.biogeog.ucsb.edu/projects/gap/gap_home.html; University of California. 2014, February 4. California Fish Species. <http://calfish.ucdavis.edu/species/?ds=241&uid=69>; Holland, Robert F. 1986, October. Preliminary Descriptions of the Terrestrial Natural Communities of California. <http://www.cal-ipc.org/ip/inventory/pdf/HollandReport.pdf>.

No sensitive natural communities are present on District school campuses.

Wildlife Movement Corridors

One regional habitat linkage in the District is identified in the Los Angeles County General Plan: a linkage along part of the north District boundary linking the San Gabriel Mountains and the Santa Susana Mountains; the linkage crosses the I-5 and SR-14 freeways just north of the junction of the two freeways.⁴⁵

⁴⁴ The El Segundo Dunes Significant Ecological Area is in the Community of Playa Del Rey in the City of Los Angeles, in the west end of the Los Angeles International Airport property (see Figure 5.4-1).

⁴⁵ Department of Regional Planning, Los Angeles County. 2013, December. Regional Habitat Linkages: Figure 9.2. http://planning.lacounty.gov/assets/upl/project/gp_2035_2014-FIG_9-2_Regional_Wildlife_Linkages.pdf.

5. Environmental Analysis BIOLOGICAL RESOURCES

Much of the area in and near the linkage is protected in the Angeles National Forest east of the two freeways, and Santa Clarita Woodlands Park west of the two freeways. No additional regional wildlife corridors in the District are identified in the City of Los Angeles General Plan.⁴⁶

Riparian Habitats, Jurisdictional Waters, and Wetlands

Riparian habitats occur along the banks of rivers and streams. Note that six of the sensitive natural communities described above in Table 5.4-5 are riparian communities: southern willow scrub and the five communities with “riparian” in the community name. Riparian habitats are mapped on the National Wetlands Mapper along numerous drainages in the District in the San Gabriel Mountains, Santa Susana Mountains, Simi Hills, Santa Monica Mountains, Hollywood Hills, and Palos Verdes Hills.⁴⁷

Major wetland areas in the District are generally in 100-year flood zones, for instance, in Hansen Dam Park, Tujunga Wash, and Pacoima Wash in the San Fernando Valley; and in Ken Malloy Harbor Regional Park in Harbor City in the City of Los Angeles.⁴⁸ Many smaller wetland areas that would be identified by site-specific jurisdictional delineations are not mapped on the National Wetlands Mapper.

Existing District schools are generally fully developed with buildings, parking lots, hardscape including walkways and hardcourts, and landscaped areas including turf playfields; thus, existing campuses usually don't include jurisdictional waters and/or wetlands.

Major Conservation Areas

Angeles National Forest

The northeast corner of the District (~~north ESC area~~) is in the Angeles National Forest (ANF), which spans about 700,000 acres extending from the west edge of San Bernardino County in the eastern San Gabriel Mountains in the east to the east edge of Ventura County in the northern Transverse Ranges in the west. The ANF provides habitat for more than 180 species identified as sensitive, of concern, or at risk.⁴⁹ No District schools are within the ANF.

San Gabriel Mountains National Monument

On Oct. 10, 2014, President Barack Obama designated 346,177 acres of existing federal lands as the San Gabriel Mountains National Monument: 342,177 acres of the ANF, and 4,002 acres of the San Bernardino National Forest, which abuts the east side of the ANF. The San Gabriel Mountains contains some of the greatest biodiversity in the country. Deep canyons, many with perennial streams, provide crucial habitat for rare and unique wildlife, including the California condor, spotted owl, bighorn sheep, and 1,000-year-old

⁴⁶ City of Los Angeles. 2001, September 26. Conservation Element of the City of Los Angeles General Plan. <http://planning.lacity.org/cwd/gnlpln/ConsvElt.pdf/>.

⁴⁷ U.S. Fish and Wildlife Service (USFWS). 2014, February 24. National Wetlands Mapper. <http://www.fws.gov/wetlands/Data/Mapper.html>.

⁴⁸ U.S. Fish and Wildlife Service (USFWS). 2014, February 24. National Wetlands Mapper. <http://www.fws.gov/wetlands/Data/Mapper.html>.

⁴⁹ Center for Biological Diversity (CBD). 2010, July 10. Introduction to the Four Southern California National Forests. http://www.biologicaldiversity.org/programs/public_lands/forests/southern_california_forests/pdfs/Intro-4-S-CA-National-Forests.pdf.

5. Environmental Analysis

BIOLOGICAL RESOURCES

limber pines.^{50, 51} The San Gabriel Mountains National Monument is outside of the District; portions of the southwest Monument boundaries are near the northeast District boundaries.⁵²

Santa Monica Mountains National Recreation Area

Much of the eastern part of the Santa Monica Mountains National Recreation Area (SMMNRA) is within the District. The SMMNRA spans over 153,000 acres, abutting U.S. 101 (Hollywood Freeway) at its east end and the Naval Base Ventura County at its west end. One District school, Topanga Elementary Charter School, is within the SMMNRA.

Proposed Rim of the Valley Corridor Special Resource Study

A Special Resource Study and Environmental Assessment for a 400,000-acre area including the Santa Monica Mountains, western San Gabriel Mountains, Santa Susana Mountains, and Simi Hills are under preparation by the National Park Service, with completion anticipated in 2014.⁵³ The special resource study will determine whether any portion of the Rim of the Valley Corridor study area is eligible to be designated as a unit of the national park system or added to the SMMNRA. The study will also explore other ways that private and/or governmental entities can protect resources and provide more outdoor recreation opportunities.⁵⁴

Palos Verdes Peninsula NCCP/HCP

The Palos Verdes Peninsula NCCP/HCP is described above.

5.4.2 Thresholds of Significance

According to CEQA Guidelines Appendix G a project would normally have a significant effect on the environment if the project would:

- BIO-1 Have a substantial effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service.

- BIO-2 Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service.

⁵⁰ US Forest Service (USFS). 2015, September 3. San Gabriel Mountains National Monument. <http://www.fs.fed.us/visit/san-gabriel-mountains-national-monument>.

⁵¹ US Forest Service (USFS). 2014, October 8. San Gabriel Mountains National Monument Fact Sheet. <http://www.fs.fed.us/sites/default/files/media/2014/41/san-gabriel-fact-sheet.pdf>.

⁵² Ibid. USFS 2014.

⁵³ An Environmental Assessment is a type of environmental documentation prepared for compliance with the National Environmental Policy Act (NEPA).

⁵⁴ National Park Service (NPS). 2014, February 12. Rim of the Valley Corridor Special Resource Study. <http://www.nps.gov/pwro/rimofthevalley/index.htm>.

5. Environmental Analysis BIOLOGICAL RESOURCES

- BIO-3 Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including but not limited to marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means.
- BIO-4 Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors or impede the use of native wildlife nursery sites.
- BIO-5 Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.
- BIO-6 Conflict with the provisions of an adopted habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.

5.4.3 Environmental Impacts

ANALYTICAL METHODOLOGY

A search of the CNDDDB, maintained by CDFW was conducted for all of the topographic quads encompassing the District, except for the Condor Peak quad, which contains the northeast corner of the District in the Angeles National Forest, where no schools are located.⁵⁵ Evaluation of the potential for sensitive animal species listed to roost or forage on campuses was based on habitat information in the CNDDDB and in life history accounts and range maps from the CDFW.

The applicable thresholds are identified in brackets after the impact statement.

Impact 5.4-1: SUP-related projects are not anticipated to substantially affect sensitive species. [Threshold BIO-1]

All SUP Projects

New construction projects on new properties could impact sensitive species directly through harm to the animal, and indirectly through creation of significant light or noise, or habitat modification. A literature search was conducted; sensitive animal species and sensitive natural communities documented in or near the District are listed above in Tables 5.4-2, 5.4-3, and 5.4-4. For each construction project on new property, biological resources that could be impacted by the project would be identified by a qualified biologist through a literature search, and, where deemed appropriate by the biologist, a site visit and/or aerial photo analysis would be conducted. A literature search using the California Natural Diversity Database (CNDDDB) generates a list of potential species occurrence; however, it would not be used as evidence of non-occurrence. CNDDDB data is limited to lands that have been surveyed and reported and a lack of records does not mean that rare plants or animals do not occur on or adjacent to the site-specific project. Field verification for the presence or

⁵⁵ The quads searched are Beverly Hills, Burbank, Calabasas, Canoga Park, Hollywood, Inglewood, Long Beach, Los Angeles, Malibu Beach, Oat Mountain, Pasadena, San Fernando, San Pedro, Simi Valley East, South Gate, Sunland, Topanga, Torrance, Van Nuys, and Venice.

5. Environmental Analysis

BIOLOGICAL RESOURCES

absence of sensitive species by a qualified biologist would take place for projects on or adjacent to sensitive species or native habitat.

All types of SUP-related projects are required to comply with USFWS, CDFW and/or the Army Corps permitting and LAUSD ~~PDF-SC-BIO-1 through SC-~~ ~~PDF-BIO-52, PDF-BIO-3, and PDF-BIO-4~~. Impacts to sensitive species would be less than significant.

Impact 5.4-2: SUP-related projects are not anticipated to substantially affect riparian habitats or other sensitive natural communities. [Threshold BIO-2]

New Construction on New Properties

Construction projects on new properties ~~could~~ may in some cases affect sensitive natural communities. ~~Currently documented;~~ sensitive natural communities ~~documented as~~ occurring in or near the District boundary are listed above in Table 5.4-5.

For each future site-specific construction project on new property, biological resources that could be impacted by the project would be identified by a qualified biologist. CDFW requires “no net loss” of either riparian habitat values or acreage. Conversion or changes to subsurface drains, placement of fill or building of structures, and channelization or removal of materials from a streambed may affect riparian habitat. SUP-related projects are required to comply with USFWS, CDFW and/or the Army Corps permitting and LAUSD ~~LAUSD SC-BIO-1 through SC-BIO-5~~ Standards. Impacts to sensitive natural communities ~~or~~ and riparian habitats would be less than significant.

New Construction and Modernization on Existing Campuses

New construction, modernization, repair, replacement, upgrade, remodel, renovation and installation projects would not cause the loss of sensitive habitats, since no sensitive habitats are present on existing District campuses. Some District campuses contain native gardens; however, these are instructional and ornamental gardens subject to frequent disturbances and thus do not provide substantial habitat value. SUP-related projects are required to comply with USFWS, CDFW and/or the Army Corps permitting and LAUSD ~~PDF-SC-BIO-1 through SC-~~ ~~PDF-BIO-52, PDF-BIO-3, and PDF-BIO-4~~. Impacts would be less than significant.

Impact 5.4-3: SUP-related projects would not have a substantial adverse on jurisdictional waters or wetlands. [Threshold BIO-3]

New Construction on New Properties

New construction projects on new properties could impact jurisdictional waters and/or wetlands. Where the biological resources investigation required under LAUSD ~~SC-BIO-1 and~~ ~~PDF-SC-BIO-4-5~~ for a project site determines that jurisdictional waters or wetlands could be present on the site, a preliminary jurisdictional delineation of the site would be required. Final jurisdictional delineations would be made by regulatory agencies: the Army Corps, the Los Angeles RWQCB, and the CDFW. CDFW requires “no net loss” of either

5. Environmental Analysis BIOLOGICAL RESOURCES

wetland habitat values or acreage. Conversion or changes to subsurface drains, placement of fill or building of structures within a wetland, and channelization or removal of materials from a streambed may affect wetlands. The District would apply for permits from the three regulatory agencies for disturbances to waters and/or wetlands. Types and areas in acres of jurisdictional waters and wetlands that would be impacted and compensation for impacts would be identified in the permits. Implementation permit requirements would be required. Impacts would be less than significant.

New Construction and Modernization on Existing Campuses

These new construction, modernization, repair, replacement, upgrade, remodel, renovation and installation projects would occur on existing school campuses. Generally an entire school campus is developed with buildings, parking lots, hardscape including walkways and hardcourts, and landscaped areas including turf playfields. Thus, existing campuses usually don't include jurisdictional waters and/or wetlands, and the overwhelming majority of projects on existing campuses would not disturb jurisdictional waters and/or wetlands. Subsequent project-level CEQA review would include a survey of the impacted area, pursuant to LAUSD SC-BIO-1 and PDF-BIO-4 ~~SC-BIO-5~~, to determine whether jurisdictional waters or wetlands could be present in the impacted area. Where potential jurisdictional waters or wetlands are identified and would be affected, the District would have a preliminary jurisdictional delineation conducted and would comply with regulatory permits. SUP-related projects are required to comply with USFWS, CDFW and/or the Army Corps permitting and LAUSD Standards. Impacts would be less than significant.

Impact 5.4-4: SUP-related projects implementation would not interfere substantially with wildlife movement or nesting. [Threshold BIO-4]

Overland Wildlife Movement

New Construction on New Properties

The only regional habitat linkage in the District is in mostly vacant land in hills connecting the San Gabriel and Santa Susana Mountains.⁵⁶ Much of the area in and near the linkage is protected in the Angeles National Forest and Santa Clarita Woodlands Park. No District schools or adjacent property cross this linkage. Impacts would be less than significant.

New Construction and Modernization on Existing Campuses

Most District campuses are developed and are in urbanized settings next to urban land uses. Campuses are not available for overland wildlife movement or migration. No existing District schools are in a designated habitat linkage. No impact would occur.

⁵⁶ County of Los Angeles General Plan

5. Environmental Analysis

BIOLOGICAL RESOURCES

Nesting Birds

All SUP Projects

Some SUP-related site-specific projects may require the removal of mature trees and shrubs. These could be used for nesting by migratory birds. Migratory nongame native bird species are protected by international treaty under the Federal Migratory Bird Treaty Act (MBTA) of 1918 (50 C.F.R. Section 10.13). Additionally, the California Fish and Game Code, Sections 3503, 3503.5, and 3513, prohibit the take of all birds and their active nests, including raptor and other migratory nongame birds (as listed under the Federal MBTA).

All projects that would remove trees would comply with the Federal MBTA and Fish and Game Code, and would implement LAUSD PDF-SC-BIO-3 that outlines required actions that would be implemented if the project site or construction staging are near and/or cause direct disturbances to native and nonnative vegetation, structures, and/or substrates during nesting season (February 1 through August 31; as early as January 1 for some raptors). With implementation of these laws, regulations, and conditions, requiring intensive nest search and delaying the removal of trees containing active nests. With this PDF, nesting impacts would be less than significant.

Impact 5.4-5: SUP-related projects would not conflict with any local policies or ordinances protecting biological resources. [Threshold BIO-5]

All SUP Projects

Most of the land in designated Significant Ecological Areas (SEAs) is vacant; and much of the land is already protected, including Griffith Park and parts of the Santa Monica Mountains National Recreation Area and Angeles National Forest. No new schools would be proposed on land already protected as open space.

Some cities, including Los Angeles, have ordinances that protect native trees such as individual oaks and sycamores, along with woodlands. Although it is not anticipated that SUP-related construction projects would affect mature native trees or woodlands, SC-BIO-4 outlines CDFW standards that would be implemented if native oaks or oak woodlands are affected.

SUP-related site-specific projects include ~~measures as part of the project design features~~ LAUSD Standards ~~to that~~ reduce impacts to native trees, natural vegetation on slopes, birds, native plants, and other biological resources. Impacts would be less than significant.

Impact 5.4-6 SUP implementation would not conflict with an adopted Habitat Conservation Plan or Natural Community Conservation Plan. [Threshold BIO-6]

All SUP Projects

Small parts of the southwest corner of the District are in the Palos Verdes Peninsula NCCP/HCP; however there are no habitat reserves within the District. No other habitat conservation plans are in the District. Program implementation would not conflict with the Palos Verdes Peninsula NCCP/HCP; therefore, no impact would occur.

5. Environmental Analysis BIOLOGICAL RESOURCES

5.4.4 Applicable Regulations and Standard Conditions

Federal

- United States Code, Title 16, Sections 1531 et seq.: Endangered Species Act
- United States Code, Title 33, Sections 1251 et seq.: Clean Water Act

State

- California Fish and Game Code, Section 2080: Endangered Species Act
- California Fish and Game Code Section 3503: Raptor protection
- California Fish and Game Code, Section 1600: Lake and Streambed Alteration Program
- California Public Resources Code, Sections 30000 et seq.: California Coastal Act

LAUSD Standard Conditions of Approval

- ~~Project Design Features: SC--BIO-1 through SC--BIO-52, BIO-3, and BIO-4~~

5.4.5 Level of Significance Before Mitigation

Upon implementation of regulatory requirements and LAUSD Standard Conditions listed above, the following impacts would be less than significant: 5.4-1, 5.4-2, 5.4-3, 5.4-4, 5.4-5, and 5.4-6.

5.4.6 Mitigation Measures

No mitigation measures are required.

5.4.7 Level of Significance After Mitigation

Impacts would be less than significant.

5. Environmental Analysis

BIOLOGICAL RESOURCES

This page intentionally left blank.

5. Environmental Analysis

5.5 CULTURAL RESOURCES

This section of the program EIR evaluates the potential for implementation of the SUP to impact cultural resources in the District. This section discusses regulatory framework (plans and policies from several jurisdictional agencies and LAUSD Standard Conditions)~~plans and policies from several jurisdictional agencies and LAUSD standard conditions, guidelines, specifications, practices, policies, and project design features (LAUSD Standards)~~, along with the existing cultural resource conditions throughout the SUP area, and possible environmental impacts that may occur as SUP-related site-specific projects are implemented during future phases of the SUP and site-specific projects implemented under the SUP.

TERMINOLOGY

Cultural resources include places, objects, and settlements that reflect group or individual religious, archaeological, or architectural activities, or paleontological resources. Such resources provide information on scientific progress, environmental adaptations, group ideology, or human advancements. Cultural resources analyzed in this section include resources located within the project site and, for purposes of assessing potential cumulative impacts, resources located within a minimum of one mile radius beyond the boundaries of the project site. Throughout this section, historical and archaeological resources are separated from paleontological resources due to the large difference in the types of resources they entail.

Architectural Resources include buildings, structures, objects, and sites of the built environment.

Historical Resources are buildings, structures, objects, sites, and districts that have been formally evaluated and found to meet one or more of the significance criteria identified in CEQA Section 15064.5 (a)(3). While most Historical Resources will be fifty years old or older, resources that have achieved significance in less than fifty years may also be considered historic, provided that a sufficient time has passed to understand their historical importance.¹

A **Historic District** is a concentration of historic buildings, structures, objects, or sites within precise boundaries that share a common historical, cultural, or architectural background, and meet one of the criteria for significance set forth in CCR Title 14, Chapter 11.5, Section 4852(b).

Historic Context is “those patterns or trends in history by which a specific occurrence, property, or site is understood and its meaning (and ultimately its significance) is made clear.” A context may be organized by theme, geographic area, or chronology; regardless of the frame of reference, a historic context is associated with a defined area and an identified period of significance. ~~Historic contexts are linked to physical artifacts through the concept of *property types*~~

Property Types are “a grouping of individual properties characterized by common physical and/or associative attributes.” A historic context, therefore, provides a framework for the evaluation of the significance of a potential historic resource.

¹ 14 CCR, Chapter 11.5, Section 4852(d)(2)

5. Environmental Analysis

CULTURAL RESOURCES

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

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

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

A **Paleontological Resource** is a natural resource characterized as faunal or floral fossilized remains, but may also include specimens of non-fossil material dating to any period preceding human occupation.

5.5.1 Environmental Setting

5.5.1.1 REGULATORY FRAMEWORK

National, State, regional and local laws, regulations, plans, and guidelines are summarized below. The following regulatory framework discussion does not include all plans and policies that relate to cultural resources 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 date when a proposed site-specific school project undergoes review. Therefore, this section provides a general discussion of the most important plans and policies that apply to SUP-related projects. Although some of these may not directly applicable to the SUP or site-specific projects implemented under the SUP, they are included to assist in identifying potential impacts and significance thresholds. Applicable LAUSD ~~Standards~~ Standard Conditions of Approval are also listed. See *Applicable Regulations and Standard Conditions* at end of this chapter for those that require District compliance.

Federal

United States Code, Title 16, Sections 470 et seq.

The **National Historic Preservation Act of 1966** (16 U.S.C. 470 et seq.) authorized the National Register of Historic Places and coordinates public and private efforts to identify, evaluate, and protect the nation’s historic and archaeological resources.

5. Environmental Analysis CULTURAL RESOURCES

Section 106 (*Protection of Historic Properties*) of the National Historic Preservation Act of 1966 (NHPA) requires federal agencies to take into account the effects of their undertakings on historic properties. Section 106 Review refers to the federal review process designed to ensure that historic properties are considered during federal project planning and implementation. The Advisory Council on Historic Preservation, an independent federal agency, administers the review process with assistance from State Historic Preservation Office (OHP)s.

United States Code, Title 16, Sections 470aa-mm

The **Archaeological Resources Protection Act** became law on October 31, 1979, and has been amended four times. It regulates the protection of archaeological resources and sites that are on federal and Indian lands.

United States Code, Title 25, Sections 3001 et seq.

The **Native American Graves Protection and Repatriation Act** (NAGPRA) is a federal law passed in 1990 that provides a process for museums and federal agencies to return certain Native American cultural items, such as human remains, funerary objects, sacred objects, or objects of cultural patrimony, to lineal descendants and culturally affiliated Indian tribes.

Code of Federal Regulations, Title 36, Chapter I, Part 60

National Register Federal Program Regulations. Title 36–Parks, Forests, and Public Property, Chapter I–National Park Service, Department of the Interior, Part 60–National Register of Historic Places is authorized by National Historic Preservation Act of 1966, as amended, 16 U.S.C. 470 et seq., and E.O. 11593.

The **National Register of Historic Places** (NRHP) is the nation’s official list of buildings, structures, objects, sites, and districts worthy of preservation because of their significance in American history, architecture, archeology, engineering, and culture. The NRHP recognizes resources of local, state and national significance which have been documented and evaluated according to uniform standards and criteria.

The NRHP includes districts, sites, buildings, structures, and objects that are significant in American history, architecture, archaeology, engineering, and culture. The NRHP is administered by the National Park Service. Currently there are more than 76,000 listings that make up the NRHP, including all historic areas in the National Park System, over 2,300 National Historic Landmarks, and properties that have been listed because they are significant to the nation, a state, or a community.

Properties are nominated to the NRHP by the State Historic Preservation Officer (SHPO) of the State in which the property is located, by the Federal Preservation Officer for properties under federal ownership or control, or by the Tribal Historic Preservation Officer if a property is on tribal lands.

Any individual or group may prepare a NRHP nomination. Thorough documentation of physical appearance and historic significance of the property is required. In California, completed nominations are submitted to the Office of Historic Preservation. After an application has been reviewed by Office of Historic Preservation staff, it is submitted to the State Historical Resources Commission (SHRC) to determine

5. Environmental Analysis

CULTURAL RESOURCES

whether or not the property meets criteria for evaluation, and the SHRC makes a recommendation to the SHPO to approve or disapprove the designation. Nominations recommended by the SHRC and approved by the SHPO are forwarded for consideration to the Keeper of the National Register at the National Park Service in Washington, D.C.

During the time the proposed nomination is reviewed by the SHPO, property owners and local officials are notified of the intent to nominate. Local officials and property owners are given the opportunity to comment on the nomination, and owners of private property are given an opportunity to object to or concur with the nomination. If the owner of a private property or the majority of owners objects to the nomination, the SHPO may forward the nomination to National Park Service only for a determination of eligibility. Without formally listing the property in the NRHP, the National Park Service then determines whether the property is eligible for listing.

Properties may qualify for the NRHP when they meet any of four basic criteria:

- Are associated with events that have made a significant contribution to the broad patterns of history.
- Are associated with the lives of persons significant in our past.
- Embody the distinctive characteristics of a type, period, or method of construction; represent the work of a master; possess high artistic values; or represent a significant and distinguishable entity whose components may lack individual distinction.
- Have yielded, or may be likely to yield, information important in prehistory or history.

A final critical component of eligibility is “integrity.” Integrity refers to the ability of a property to convey its significance and the degree to which the property retains the identity, including physical and visual attributes, for which it is significant under the four basic criteria. The NRHP criteria recognize seven aspects or qualities of integrity: location, design, setting, materials, workmanship, feeling, and association.

State

California Health and Safety Code, Section 7050.5

This code requires that if human remains are discovered in the project site, disturbance of the site shall halt and remain halted until the coroner has conducted an investigation into the circumstances, manner, and cause of any death, and the recommendations concerning the treatment and disposition of the human remains have been made to the person responsible for the excavation, or to his or her authorized representative. If the coroner determines that the remains are not subject to his or her authority and recognizes or has reason to believe the human remains are those of a Native American, he or she shall contact, by telephone within 24 hours, the Native American Heritage Commission.

5. Environmental Analysis CULTURAL RESOURCES

California Public Resources Code, Sections 5020–5029.5

This code continued the former Historical Landmarks Advisory Committee as the **State Historical Resources Commission**. The commission oversees the administration of the CRHR and is responsible for the designation of State Historical Landmarks and Historical Points of Interest.

California Public Resources Code, Sections 5079–5079.65

This code defines the functions and duties of the **Office of Historic Preservation** (OHP). The OHP is responsible for the administration of federal- and state-mandated historic preservation programs in California and the California Heritage Fund.

California Public Resources Code, Sections 5097.9–5097.991

This code provides protection to Native American historical and cultural resources and sacred sites, and identifies the powers and duties of the **Native American Heritage Commission** (NAHC). It also requires notification to descendants of discoveries of Native American human remains and provides for treatment and disposition of human remains and associated grave goods.

California Public Resources Code, Section 5024.1

The **California Register of Historical Resources** (CRHR) is the State version of the NRHP program. The CRHR was enacted in 1992 and became official January 1, 1993. The CRHR was established to serve as an authoritative guide to the state's significant historical and archaeological resources (~~California Public Resources Code (PRC) Section 5024.1~~). The program may involve resources listed or eligible for listing in the California Register. These resources may include properties already under the ownership of the district, and properties considered and acquired for implementation of the SUP.

Resources that may be eligible for listing include buildings, sites, structures, objects, and historic districts. CEQA identifies a historic resource as a property that is listed on—or eligible for listing on—the NRHP, CRHR, or local registers. NRHP-listed properties are automatically included on the CRHR. The criteria for both are similar and described below, with the NRHP letter (A, B, C, and D) followed by the corresponding CRHR number (1, 2, 3, and 4)

- **A/1:** For an association with events that have made a significant contribution to the broad patterns of local or regional history, or the cultural heritage of California or the United States (~~NRHP Criterion A; CRHR Criterion 1~~);
- **B/2:** For an association with the lives of persons important to local, California, or national history (~~NRHP Criterion B; CRHR Criterion 2~~);
- **C/3:** As an embodiment of the distinctive characteristics of a type, period, region, or method of construction, representative of the work of a master or high artistic values (~~NRHP Criterion C; CRHR Criterion 3~~); or

5. Environmental Analysis

CULTURAL RESOURCES

- **D/4:** Has yielded, or has the potential to yield, information important to the prehistory or history of the local area, California, or the nation (~~NRHP Criterion D; CRHR Criterion 4~~).

Resources eligible for listing in the CRHR must retain enough of their historic character or appearance to be “recognizable as historic resources and to convey the reasons for their significance.” Under CRHR regulations, “it is possible that historical resources may not retain sufficient integrity to meet the criteria for listing in the NRHP, but they may still be eligible for listing in the California Register.”² OHP has consistently interpreted this to mean that a California Register–eligible property must retain “substantial” integrity. Because CRHR regulations do not provide substantial written guidance on evaluating integrity, the NRHP bulletin, “How to Apply the National Register Criteria for Evaluation,” is used.

The CRHR also includes properties that: have been formally determined eligible for listing or are listed in the NRHP; are registered State Historical Landmark Number 770 and above; are points of historical interest that have been reviewed and recommended to the State Historical Resources Commission for listing; and are city- and county-designated landmarks or districts (if criteria for designation are determined by OHP to be consistent with CRHR criteria).

California Historical Landmarks are buildings, structures, sites, or places that have been determined to have statewide historical significance. The resource must be approved for designation by the County Board of Supervisors or the City/Town Council in whose jurisdiction it is located; be recommended by the State Historical Resources Commission; and be officially designated by the Director of California State Parks. A resource must meet at least one of these following criteria:

- Be the first, last, only, or most significant of its type in the state or within a large geographic region (Northern, Central, or Southern California).
- Be associated with an individual or group having a profound influence on the history of California.
- Be a prototype of, or an outstanding example of, a period, style, architectural movement or construction or is one of the more notable works or the best surviving work in a region of a pioneer architect, designer or master builder.

California Points of Historical Interest are sites, buildings, features, or events that are of local (city or county) significance and have anthropological, cultural, military, political, architectural, economic, scientific or technical, religious, experimental, or other value. Points of Historical Interest designated after December 1997 and recommended by the State Historical Resources Commission are also listed in the CRHR. No historical resource may be designated as both a landmark and a point. If a point is subsequently granted status as a landmark, the point designation is retired.

To be eligible for designation as a Point of Historical Interest, a resource must meet at least one of the following criteria:

² 14 CCR Section 4852(c).

5. Environmental Analysis CULTURAL RESOURCES

- The first, last, only, or most significant of its type within the local geographic region (city or county).
- Associated with an individual or group having a profound influence on the history of the local area.

A prototype of, or an outstanding example of, a period, style, architectural movement or construction or is one of the more notable works or the best surviving work in the local region of a pioneer architect, designer or master builder.

5. Environmental Analysis

CULTURAL RESOURCES

California Code of Regulations, Title 24, Part 8

The 2010 California Historic Building Code provides regulations for the preservation, restoration, rehabilitation, relocation, or reconstruction of buildings or properties designated as qualified historical buildings or properties. The Code is intended to provide solutions for the preservation of qualified historical buildings or properties, to promote sustainability, to provide access for persons with disabilities, to provide a cost-effective approach to preservation, and to provide for the reasonable safety of the occupants or users.

California Government Code Sections 50280 et seq

Under the Mills Act a city or county may contract with the owner of any qualified historical property to restrict the use of the property.

California Public Resources Code Sections 21000 et seq. and California Code of Regulations Title 14 Sections 15000 et seq.

The **California Environmental Quality Act (CEQA)** and the **CEQA Guidelines** have specific provisions relating to the evaluation of a project's impact on historical and unique archaeological resources.

PRC Section 21084.1 of CEQA and Section 15064.5 of the CEQA Guidelines together establish the prevailing test for determining whether a resource can or must be considered a historical resource under CEQA. First, a resource is considered a historical resource for purposes of CEQA if it is listed or "deemed eligible for listing" in the CRHR by the State Historical Resources Commission.³ Second, it will be considered a historical resource, based on a presumption of significance, if it is either (1) listed in a local register of historic resources as defined in PRC Section 5010.1,⁴ or (2) identified in a local survey of historic resources meeting the criteria set forth in PRC Section 5024.1.⁵ If a resource meets either of these criteria, the lead agency must treat the resource as historically significant unless the "preponderance of the evidence" indicates that the resource is not historically significant.

Third, a lead agency may find a resource to be a historical resource even though it is not formally listed in the California Register, listed in a local register, or identified in a local survey.⁶ Any such determination must be based on substantial evidence in light of the whole record.⁷

CEQA also provides further guidance with respect to historical resources of an archeological nature and unique archaeological resources. A unique archeological resource is defined in PRC Section 21083.2(g) as:

[A]n archaeological artifact, object or site about which it can be clearly demonstrated that, without merely adding to the current body of knowledge, there is a high probability that it meets any of the following criteria: (1) contains information needed to answer important scientific research questions and that there is a demonstrable public interest in that

³ PRC Section 21084.1; 14 CCR Section 15064.5(a)(1).

⁴ PRC Section 21084.1; 14 CCR Section 15064.5(a)(2).

⁵ PRC Section 21084.1; 14 CCR Section 15064.5(a)(2).

⁶ PRC Sections 21084.1 and 15064.5(a)(3)(4).

⁷ 14 CCR Section 15064.5(a)(3).

5. Environmental Analysis CULTURAL RESOURCES

information, (2) has a special and particular quality such as being the oldest of its type or best available example of its type, and (3) is directly associated with a scientifically recognized important prehistoric or historic event or person.

According to the CEQA Guidelines Section 15064.5(b): “A project with an effect 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.” This section of the guidelines defines historical resources as including both the built environment and archaeological resources.

A substantial adverse change is defined in the CEQA Guidelines Section 15064.5(4)(b)(1), 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.” The significance of an historical resource is materially impaired, according to the CEQA Guidelines Section 15064.5(4)(b)(2), when a project:

- (A) Demolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register of Historical Resources; or
- (B) Demolishes or materially alters in an adverse manner those physical characteristics that 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 an 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 the evidence that the resource is not historically or culturally significant; or
- (C) Demolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its eligibility for inclusion in the California Register of Historical Resources as determined by a lead agency for purposes of CEQA.

The CEQA Guidelines provide that “generally” a project that follows the Secretary’s Standards “shall be considered as mitigated to a level of less than a significant impact on the historical resource.”⁸

At the same time, however, a failure to precisely conform to the Secretary’s Standards in all respects does not necessarily mean that a project necessarily has a significant adverse impact on historical resources. There are circumstances where a project impacting historical resources may fail to conform to the Secretary’s Standards, and yet the lead agency can conclude based on substantial evidence that the overall impact is insignificant because the project does not “materially impair” the historical resource within the meaning of Section 15064.5(b).

CEQA Guidelines Section 15064.5 subsection (c) addresses impacts on archaeological sites. That section provides as follows:

⁸ 14 CCR Sections 15064.5(b)(3) and 15126.4(b).

5. Environmental Analysis

CULTURAL RESOURCES

- (1) When a project will impact an archaeological site, a lead agency shall first determine whether the site is an historical resource, as defined in subsection (a).
- (2) If a lead agency determines that the archaeological site is an historical resource, it shall refer to the provisions of Section 21084.1 of the Public Resources Code and this section, Section 15126.4 of the Guidelines, and the limits contained in Section 21083.2 of the Public Resources Code do not apply.
- (3) If an archaeological site does not meet the criteria defined in subsection (a), but does meet the definition of a unique archaeological resource in Section 21083.2 of the Public Resources Code, the site shall be treated in accordance with the provisions of Section 21083.2. The time and cost limitations described in Public Resources Code Section 21083.2 (c–f) do not apply to surveys and site evaluation activities intended to determine whether the project location contains unique archaeological resources.

For historical resources of an archaeological nature, “preservation in place is the preferred manner of mitigating impacts to archaeological sites.”⁹ “When recovery through excavation is the only feasible mitigation, a data recovery plan, which makes provisions for adequately recovering the scientifically consequential information from and about the historical resource, shall be prepared and adopted prior to any excavation being undertaken.” In practice, the OHP has consistently determined that excavation, coupled with implementation of a data recovery plan, does not result in a significant environmental impact on a historical resource of an archaeological nature.

A project that would cause “damage to a unique archaeological resource, may require reasonable efforts to be made to permit any or all of these resources to be preserved in place or left in an undisturbed state.” “To the extent that unique archaeological resources are not left in an undisturbed state, mitigation measures shall be required as provided in this subdivision.”¹⁰ CEQA Guidelines Section 15064.5(f) provides that “a lead agency should make provisions for historical or unique archaeological resources accidentally discovered during construction.”

CEQA Guidelines Section 15064.5(d) specifies a process for evaluating human remains, and this issue is identified on the CEQA Checklist as an issue for evaluation in environmental documents. In addition, the CEQA Checklist identifies the presence of paleontological resources as an environmental concern that needs to be considered. Therefore, the issues of human remains and paleontological resources are included in the significance criteria and the evaluation of impacts at the program level.

Senate Bill 18

Traditional Tribal Cultural Places Act was signed into law in September 2004 and went into effect on March 1, 2005. The law institutes a process which requires a city or county to consult with the NAHC and any appropriate Native American tribe for the purpose of preserving relevant traditional tribal cultural places (TTCP) prior to the adoption, revision, amendment, or update of a city’s or county’s general plan. While SB

⁹ 14 CCR Section 15126.4(b)(3)(A).

¹⁰ PRC Section 210783.2(b) and (c).

5. Environmental Analysis CULTURAL RESOURCES

18 does not specifically mention consultation or notice requirements for adoption or amendment of specific plans, the Tribal Guidelines advises that SB 18 requirements extend to specific plans as well, as state planning law requires local governments to use the same process for amendment or adoption of specific plans as general plans (defined in California Government Code Section 65453). The Office of Planning and Research Tribal Guidelines recommends that the NAHC provide written information as soon as possible but no later than 30 days to inform the Lead Agency if the proposed project is determined to be in proximity to a TTCP and another 90 days for tribes to respond to a local government if they want to consult on possible adverse impacts on the TTCP. There is no statutory limit on the consultation duration. The CEQA public distribution list may include tribes listed by the NAHC who have requested consultation or it may not. If the NAHC, the tribe, and interested parties agree upon the mitigation measures necessary for the proposed project, they would be included in the project's EIR. If both the City and the tribe agree that adequate mitigation or preservation measures cannot be taken, then neither party is obligated to take action.

SB 18 requires that a Native American TTCP must be shown to actually have been used for activities related to traditional beliefs, cultural practices, or ceremonies. The law also amended Civil Code Section 815.3 and adds California Native American tribes to the list of entities that can acquire and hold conservation easements for the purpose of protecting their cultural places.

Assembly Bill 52

The **Native American Historic Resource Protection Act** (AB 52) took effect July 1, 2015, and incorporates tribal consultation and analysis of impacts to tribal cultural resources (TCR) into the CEQA process. It requires TCRs to be analyzed like any other CEQA topic and establishes a consultation process for lead agencies and California tribes. Projects that require a Notice of Preparation of an EIR or Notice of Intent to adopt a ND or MND on or after July 1st are subject to AB 52. A significant impact on a TCR is considered a significant environmental impact, requiring feasible mitigation measures.

TCRs must have certain characteristics:

- 1) Sites, features, places, cultural landscapes (must be geographically defined), sacred places, and objects with cultural value to a California Native American tribe that are either included or determined to be eligible for inclusion in the California Register of Historic Resources or included in a local register of historical resources.¹¹
- 2) The lead agency, supported by substantial evidence, chooses to treat the resource as a TCR.¹²

The first category requires that the TCR qualify as a historical resource according to PRC Section 5024.1. The second category gives the lead agency discretion to qualify that resource—under the conditions that it support its determination with substantial evidence and consider the resource's significance to a California tribe. The following is a brief outline of the process.¹³

¹¹ PRC Section 21074(a)(1).

¹² PRC Section 21074(a)(2).

¹³ PRC Sections 21080.3.1–3.3

5. Environmental Analysis

CULTURAL RESOURCES

- 1) A California Native American tribe asks agencies in the geographic area with which it is traditionally and culturally affiliated to be notified about projects. Tribes must ask in writing.
- 2) Within 14 days of deciding to undertake a project or determining that a project application is complete, the lead agency must provide formal written notification to all tribes who have requested it.
- 3) A tribe must respond within 30 days of receiving the notification if it wishes to engage in consultation.
- 4) The lead agency must initiate consultation within 30 days of receiving the request from the tribe.
- 5) Consultation concludes when both parties have agreed on measures to mitigate or avoid a significant effect to a TCR, OR a party, after a reasonable effort in good faith, decides that mutual agreement cannot be reached.
- 6) Regardless of the outcome of consultation, the CEQA document must disclose significant impacts on TCRs and discuss feasible alternatives or mitigation that avoid or lessen the impact

Local

City of Los Angeles Cultural Heritage Department

The City of Los Angeles Cultural Heritage Department is authorized under Administrative Code Title 22 Chapter 7 (Sections 22.101 et seq.), and the City Cultural Heritage Commission is authorized under Administrative Code Title 22 Chapter 9 Article 1 (Sections 22.171 et seq.).

In the City of Los Angeles, properties may be designated Historic-Cultural Monuments and/or may be included in Historic Preservation Overlay Zones. The Historic-Cultural Monument designation is reserved for individual historically significant properties. Historic Preservation Overlay Zones apply to areas of historical or cultural significance.

Los Angeles Historic-Cultural Monuments

In the City of Los Angeles, an HCM is defined in Cultural Heritage Ordinance Section 22.130 as "...any site (including significant trees or other plant life located thereon), building, or structure of particular historical or cultural significance to the City of Los Angeles, such as historic structures or sites in which broad cultural, political, economic, or social history of the nation, State, or community is reflected or exemplified or which are identified with historic personages or with important events within the main currents of national, State or history, or which embodies the distinguishing characteristics of an architectural-type specimen, inherently valuable for a study of a period, style or method of construction, or a notable work of a master builder, designer, or architect whose individual genius influenced his age." Listing of a site as an HCM is subject to review by the Cultural Heritage Commission and the Arts, Health, and Humanities Committee of the city council, and requires approval by the city council. The city currently has over 1,000 historic-cultural

5. Environmental Analysis CULTURAL RESOURCES

monuments, providing official recognition and protection for Los Angeles' most significant and cherished historic resources.¹⁴

Historic Preservation Overlay Zone

The Historic Preservation Overlay Zone (HPOZ) Ordinance was adopted by the City of Los Angeles in 1979 and revised in 1997. As defined in the Cultural Heritage Masterplan Review Draft (March 7, 2000), an HPOZ is "...a planning tool which recognizes the special qualities of areas of historic, cultural, or architectural significance. An HPOZ does not change the underlying zoning, rather it lays an added level of protection over a zone through local board oversight." There are 29 designated historic preservation overlay zones in Los Angeles. The Cultural Heritage Masterplan identifies the criteria for evaluating HPOZ applications. Under those criteria, "structures, natural features, or sites within the involved area, or the area as a whole, shall meet one or more of the following:

- "Adds to the historic architectural qualities or historic associations for which a property is significant because it was present during the period of significance, and possesses historic integrity reflecting its character at that time.
- "Owing to its unique location or singular physical characteristics, represents an established feature of the neighborhood, community, or City."
- "Retaining the structure would help preserve and protect an historic place or area of historic interest in the City."

Because HPOZs have "special character or special historical, cultural, architectural, archeological, community or aesthetic value," they are "presumed to be historically or culturally significant" and are therefore considered eligible for listing in the California Register.

Other Cities

Of the cities either entirely or partially within the district's boundaries, only the City of Los Angeles has a historic preservation element in its general plan. However, the following cities do have historic preservation ordinances or regulations governing historic properties: Bell Gardens, Carson, El Segundo, Gardena, Huntington Park, Long Beach, Montebello, Monterey Park, Rancho Palos Verdes, San Fernando, Santa Monica, South Gate, Torrance, and West Hollywood.

Los Angeles County

County of Los Angeles historic preservation policies include local designation processes, commissions, or boards established to review historic properties, and zoning or other variances or special provisions for historic properties. Los Angeles County programs for protections for historic properties include the county Mills Act Program, which provides incentives for owners of qualified historical properties within the

¹⁴ City of Los Angeles Office of Historic Resources. 2014, March 11. Historic-Cultural Monuments and the Cultural Heritage Commission. <http://www.preservation.lacity.org/commission>.

5. Environmental Analysis CULTURAL RESOURCES

unincorporated areas of the county to preserve, restore, and rehabilitate the historic character of such properties. The county Landmarks and Records Commission recommends to the county board of supervisors local historical landmarks defined to be worthy of registration by the State of California Department of Parks and Recreation, either as “California Historical Landmarks” or as “Points of Historical Interest,” and may consider and comment for the board on applications relating to the NRHP. The Mills Act Program is authorized under Los Angeles County Code of Ordinances Sections 22.52.2700 et seq., and the Landmarks and Records Commission is authorized under Sections 3.30.010 et seq.¹⁵

LAUSD

Standard Conditions of Approval

This table lists the cultural resource related standard conditions and project design features (PDF) that are will be included as part of each SUP-related project, as appropriate.

PDF Reference #	Topic	Trigger for Compliance	Implementation Phase	Standard Conditions and Project Design Features
Standard Condition				
<u>SC-CUL-100</u> Compliance	Cultural Resource Assessment Procedures	If a project may affect historic resources.	Prior to project approval	OEHS CEQA Specification Manual, Appendix H, Historical Resources Policy This document establishes assessment methodology and procedures for the identification and analysis of historical resources, unique archaeological resources, and paleontological resources pursuant to the CEQA.
<u>SC-CUL-42</u>				
<u>SC-CUL-42</u>	Architectural Character	If a project may affect historic buildings or structures.	During project design	School Design Guide. LAUSD shall re-use rather than destroy historical resources, where feasible. LAUSD shall take the following steps when dealing with historical resources: <ul style="list-style-type: none"> • Retain and preserve the historic character of a building, structure, or site, where feasible. • Treat distinctive architectural features or examples of skilled craftsmanship that characterize a building with sensitivity, where feasible. • Conceal reinforcement required for structural stability or the installation of life safety or mechanical systems, wherever feasible. • Undertake surface cleaning of historic structures with the gentlest means possible. Avoid sandblasting and chemical treatments
<u>SC-CUL-3</u>	<u>Architectural Character</u>	<u>May affect historic buildings or structures</u>	<u>During project design</u>	<u>Design Guidelines and Treatment Approaches for Historic Schools.</u> <u>This document outlines the use of design guidelines as an effective tool for planning and implementing projects that avoid significant adverse impacts to historic resources.</u>
<u>SC-CUL-24</u>	Historical Resource Assessment	If a Cultural Resource Assessment identifies historic resources on or near a proposed project	During project design and prior start of CEQA document	LAUSD shall engage a design team, consisting of an architect and structural engineer, as necessary, with five (5) years' experience applying the Secretary of the Interior's Standards for the Treatment of Historic

¹⁵ <https://library.municode.com/index.aspx?clientId=16274>.

5. Environmental Analysis CULTURAL RESOURCES

PDF Reference #	Topic	Trigger for Compliance	Implementation Phase	Standard Conditions and Project Design Features
		site		Properties. The Design Team, in consultation with the Master Reviewer, shall consider whether and to what extent the proposed project could have a significant impact on the site's historical resources. If the Design Team determines that the proposed project could have a significant impact on the site's historical resources, and the Master Reviewer concurs with that determination, the Design Team shall develop and consider mitigation measures and alternatives that could minimize, avoid or substantially reduce the impacts.
<u>SC-CUL-35</u>	Historical Resource Assessment	For projects involving the R +relocation, conversion, rehabilitation, or alteration of an historical resource, or construction in the immediate surroundings of an historical resource-	During project design and prior start of CEQA document	LAUSD shall develop at least one alternative that either (1) complies with the Secretary of the Interior's Standards for the Treatment of Historic Properties, or (2) otherwise avoids material impairment of the historical resource. LAUSD need not adopt any such alternative unless the LAUSD Board of Education determines that the alternative is feasible within the meaning of PRC Section 21061.1 and necessary to avoid a significant impact on historical resources.
<u>SC-CUL-46</u>	Historical Resource Preservation	For projects involving the R +relocation, conversion, rehabilitation or alteration of an historical resource, or construction in the immediate surroundings of an historical resource, and if compliance with the Secretary's Standards or avoidance of a material impairment of the historical resources is adopted as a site-specific project mitigation measure or alternative-	During design development phase, and implementation of mitigation measures.	LAUSD shall retain a preservation architect meeting the Secretary of the Interior's Professional Qualifications Standards in historic architecture (preservation architect) to review and comment upon project plans through the design development phase for conformance with the adopted mitigation measure or alternative.
<u>SC-CUL-57</u>	Historical Resource Preservation	<u>May affect historic buildings or structures</u> For projects that may impact an historical resource	During pre-construction and construction monitoring activities	The preservation architect shall participate in pre-construction and construction monitoring activities to ensure continuing conformance with Secretary's Standards and/or avoidance of a material impairment of the historical resources.
<u>SC-CUL-68</u>	Historical Resource Documentation	If a project or any project alternative <u>D</u> includes the demolition or potential damage to any recognized historic resources or any contributors to a historic district-	Prior to demolition or alteration	LAUSD shall retain a professional architectural photographer and an architectural historian that meets the Secretary of the Interior's Professional Qualifications Standards (Architectural Historian) to implement Historic American Building Survey (HABS) Level II documentation or closely following the HABS Level II outline format. Documentation shall include drawings, photographs, and written data for each building/structure/element. For all levels of documentation, the following quality standards shall be met: Large format photographs: Photographic documentation shall include of the current status of all recognized historic resources or any contributors to a historic district and the existing surrounding setting. Large format photographs

5. Environmental Analysis CULTURAL RESOURCES

PDF Reference #	Topic	Trigger for Compliance	Implementation Phase	Standard Conditions and Project Design Features
				<p>shall clearly depict the appearance of the property and areas of significance of the recorded building, site, structure, or object. Each view shall be perspective corrected and fully captioned. All shall be archivally processed and prints shall be made on fiber-based paper. Two original negatives (large format 4-inch by 5-inch black and white negatives) shall be made at the time the photographs are taken, two sets of contact prints, and three sets of 8-inch by 10-inch prints shall be processed.</p> <ul style="list-style-type: none"> • one set of negatives and one set of contact prints shall be archived at the National Park Service for entry into the HABS collection in the Library of Congress • one set of negatives and one set prints shall be archived at Los Angeles Public Library at the Central Library. • one set of prints shall be archived at the Los Angeles City Historical Society. • one set of prints shall be archived at LAUSD. <p>Narrative description: 1) Written history and description shall be based on primary sources to the greatest extent possible. A frank assessment of the reliability and limitations of sources shall be included. Within the written history, statements shall be footnoted as to their sources, where appropriate. The written data shall include a methodology section specifying name of researcher, date of research, sources searched, and limitations of the project; 2) the architectural historian shall prepare a narrative description (closely following the Historic American Buildings Survey Level II outline format) of historical architectural resources, including Department of Parks and Recreation (DPR) series forms.</p> <p>Document Submittal: The draft documentation shall be assembled by the architectural historian and submitted to the LAUSD Architectural Master Reviewer for review and comment. Architectural Master Reviewer shall give final approval prior and receive final documentation prior to submittal to the repositories and prior to work on the project. LAUSD shall submit the LAUSD-approved final documentation to the Los Angeles Public Library at the Central Library and the South Central Coastal Information Center.</p>
<u>SC-CUL-79</u>	Historical Resource Notification	For projects where LAUSD has identified historical resources on the site.	As part of the public review process	LAUSD shall provide OHP and the Los Angeles Conservancy copies of all negative declarations and environmental impact reports.
<u>SC-CUL-810</u>	Historical Resource Reuse	If a project or any project alternative includes the demolition of any of the recognized historic structures	Prior to demolition or alteration	LAUSD, consistent with Education Code Section 17540, shall offer to sell any useful features of the school building (e.g., the school bell, chalkboards, lockers, etc.) that do not contain hazardous materials for use or display, if features are not retained by LAUSD for reuse or display.
<u>SC-CUL-911</u>	Historical Resource Reuse	If a project or any project alternative includes the demolition	Prior to demolition or alteration	LAUSD, consistent with Education Code Section 17545, shall offer for sale any remaining functional and defining features and building materials from the buildings. These

5. Environmental Analysis CULTURAL RESOURCES

PDF Reference #	Topic	Trigger for Compliance	Implementation Phase	Standard Conditions and Project Design Features
		of any of the recognized historic structures		materials could include doors, windows, siding, stones, lighting, doorknobs, hinges, cabinets, and appliances, among others. They shall be made available to the public for sale and reuse, if features are not retained by LAUSD for reuse or display.
<u>SC- CUL-1012</u>	Archaeological Resource	if the project area is deemed highly sensitive for archaeological resources.	Prior to and during grading, excavation, or other ground-disturbing activities	LAUSD shall retain a qualified archaeologist to be available on-call. The qualified archaeologist shall meet the Secretary of the Interior's Professional Qualifications Standards (48 Federal Register 44738-39).

5. Environmental Analysis CULTURAL RESOURCES

PDF Reference #	Topic	Trigger for Compliance	Implementation Phase	Standard Conditions and Project Design Features
SC- CUL- 14 13	Historic and Archaeological Resource	If Historical or unique archaeological resources are discovered during construction activities.	During grading, excavation, or other ground-disturbing activities	The contractor shall halt construction activities in the immediate area and notify the LAUSD. LAUSD shall retain a qualified archeologist to make an immediate evaluation of significance and appropriate treatment of the resource. To complete this assessment, the qualified archeologist will be afforded the necessary time to recover, analyze, and curate the find. The qualified archeologist shall recommend the extent of archeological monitoring necessary to ensure the protection of any other resources that may be in the area. Construction activities may continue on other parts of the building site while evaluation and treatment of historical or unique archaeological resources takes place.
SC- CUL- 14 14	Archaeological Resource Monitoring Program	When a Phase I Archaeological Site Investigation shows a strong possibility that unique resources, and/or unique architectural resources have been identified on a site.	Prior to the start of construction	LAUSD shall implement an archaeological monitoring program for construction activities at a site prepared by a qualified archaeologist under the following conditions: (1) when a Phase I Site Investigation shows a strong possibility that unique archeological resources are buried on the site; and/or (2) when unique architectural resources have been identified on a site, but LAUSD does not implement a Phase III Data Recovery/Mitigation Program because the resources can be recovered through the archaeological monitoring program.
SC- CUL- 14 15	Archaeological Resource	If any Evidence of prehistoric or historic cultural resources is uncovered.	During grading, excavation, or other ground-disturbing activities	All work shall stop within a 30-foot radius of the discovery. Work shall not continue until the discovery has been evaluated by a qualified archaeologist. The qualified archaeologist shall assess the find(s) and, if it is determined to be of value, shall draft a monitoring program and oversee the remainder of the grading program. Should evidence of prehistoric or historic cultural resources be found the archaeologist shall monitor all ground-disturbing activities related to the proposed project. Any significant archaeological resources found shall be preserved as determined necessary by the archaeologist and offered to a local museum or repository willing to accept the resource. Any resulting reports shall also be forwarded to the South Central Coastal Information Center at the California State University, Fullerton.
SC- CUL- 14 16	Archaeological Resource	If project construction requires archaeological monitoring	Prior to the start grading, excavation, or other ground-disturbing activities	Cultural resources sensitivity training shall be conducted by a qualified archaeologist for all construction workers involved in moving soil or working near soil disturbance. This training shall review the types of archaeological resources that might be found, along with laws for the protection of resources.
SC- CUL- 14 17	Archaeological Resource	When unique archaeological resources are discovered and LAUSD determines not to avoid them by abandoning the site or redesigning the project	During grading, excavation, or other ground-disturbing activities	LAUSD shall determine whether it is feasible to prepare and implement a Phase III Data Recovery/Mitigation Program. A Phase III Data Recovery/Mitigation Program would be designed by a Qualified Archaeologist to recover a statistically valid sample of the archaeological remains and to document the site to a level where the impacts can be determined to be less than significant. All documentation shall be prepared in the standard format of the ARMR Guidelines, as prepared by the OHP. Once a Phase III Data Recovery/Mitigation Program is completed, an archaeological monitor shall be present on site to

5. Environmental Analysis CULTURAL RESOURCES

PDF Reference #	Topic	Trigger for Compliance	Implementation Phase	Standard Conditions and Project Design Features
				oversee the grading, demolition activities, and/or initial construction activities to ensure that construction proceeds in accordance with the adopted Phase III Data Recovery/Mitigation Program. The extent of the Phase III Data Recovery/Mitigation Program and the extent and duration of the archaeological monitoring program depend on site-specific factors.
SC-CUL-1618 SC-CUL-1618	Native American Resource	<u>Project requires a Notice of Intent (NOI) or Notice of Preparation (NOP) under CEQA if evidence of Native American resources is uncovered</u>	<u>Within 14 days of submittal of FSD project to OEHS or completion of project description</u> During grading, excavation, or other ground-disturbing activities	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. LAUSD shall comply with AB 52 (Gatto, 2014). Guidance for consultation and analysis of "tribal cultural resources" is on the Governor's Office of Planning and Research website http://www.opr.ca.gov/s_ab52.php . Because the guidance documents are being updated it is not included as an appendix to this EIR. CEQA Guidelines update to Appendix G must be drafted by OPR, and adopted by Resources Agency by July 1, 2016. LAUSD shall incorporate new OPR CEQA checklist questions.-
SC-CUL-1719 SC-CUL-1719	Paleontological Resource	If the Cultural Resources Assessment identifies the project area as sensitive for paleontological resources.-	During grading, excavation, or other ground-disturbing activities	LAUSD shall have a paleontological monitor on-call during construction activities. This monitor shall provide the construction crew(s) with a brief summary of the sensitivity, the rationale behind the need for protection of these resources, and information on the initial identification of paleontological resources. If paleontological resources are uncovered during construction, the on-call paleontologist shall be notified and afforded the necessary time and funds to recover, analyze, and curate the find(s). Subsequently, the monitor shall remain on site for the duration of the ground disturbances to ensure the protection of any other resources that may be in the area.
SC-CUL-2018 SC-CUL-2018	Paleontological Resource	If the project area is deemed highly sensitive for paleontological resources.-	During grading, excavation, or other ground-disturbing activities	The paleontological monitor shall be on site for all ground altering activities and shall advise LAUSD as to necessary means of protecting potentially significant paleontological resources, including, but not limited to, possible cessation of construction activities in the immediate area of a find. If resources are identified during the monitoring program, the paleontologist shall be afforded the necessary time and funds to recover, analyze, and curate the find(s). Subsequently, the monitor shall remain on site for the duration of the ground disturbances to insure the protection of any other resources that may be in the area.

5.5.1.2 EXISTING CONDITIONS

Natural Setting

California has been divided into 11 geomorphic provinces, that is, regions defined by characteristic landforms. The District spans parts of two geomorphic provinces: the Transverse Ranges Geomorphic Province, an

5. Environmental Analysis

CULTURAL RESOURCES

east-west-trending series of steep mountain ranges and valleys; and the Peninsular Ranges Geomorphic Province, a series of northwest-trending mountain ranges and valleys. The boundary between the two geomorphic provinces within the District is the southern base of the Santa Monica Mountains and the Hollywood Hills.

Nearly all the southern half of the District is in the Los Angeles Basin; the southwest corner of the District is in the Palos Verdes Hills. Major landforms in the Northwest Local District are, from north to south: Santa Susana Mountains, San Fernando Valley, Simi Hills, and Santa Monica Mountains. Major landforms in the Northwest Local District, from north to south, are: north half of the District are, from north to south: San Gabriel Mountains, Santa Susana Mountains, San Fernando Valley, Verdugo Mountains, Simi Hills, San Rafael Hills, Repetto Hills, Santa Monica Mountains, and Hollywood Hills, and Los Angeles Basin. The San Rafael Hills are in the Central Local District; the, Repetto Hills are in the East Local District; and portionsart of the Los Angeles Basin are in the Central, East, West, and South Local Districtsare in the East Educational Service Center (ESC); the remainder of the landforms are in the North ESC. Landforms in the District are described further in Section 5.6, *Geology and Soils*, of this DEIR.

Much of the District is urbanized. The California Resources Agency has divided California into 10 bioregions, that is, ecologically and geographically defined areas. Bioregions are defined based on geology, landforms, soils, climate, vegetation, land use, and wildlife. The District is in the South Coast Bioregion, which extends from the southern half of Ventura County to the Mexican border and east to the edge of the Mojave desert. The climate of most of the South Coast Bioregion is mild year-round with warm dry summers and wet winters. Habitat varies widely, from chaparral, juniper-pinyon woodland, and grasslands at lower elevations to mixed hardwood forest, southern oak, southern Jeffrey pine, and southern yellow pine at higher levels.¹⁶ Much of the South Coast Bioregion is urbanized.

Vegetation types in the part of the District in the San Gabriel Mountains include mixed chaparral, montane hardwood, chamise-redshank chaparral, and coastal scrub.¹⁷ Vegetation types in the Santa Monica Mountains near Topanga Elementary Charter School include coastal oak woodland and annual grassland.¹⁸ The aforementioned vegetation types are described in Section 5.4, *Biological Resources*, of this DEIR.

Unique Geological Features

La Brea Tar Pits

The La Brea Tar Pits are one of the best-known localities for ice-age fossils in the world. The La Brea Tar Pits are in and near the 23-acre Hancock Park in the City of Los Angeles, which includes an art museum and the Page Museum (tar pit-related displays and activities). The tar pits have provided an abundance of animal

¹⁶ California Resources Agency (CRA). 1998, December. South Coast Bioregion.

¹⁷ National Park Service (NPS). 2011, September. San Gabriel Watershed and Mountains: Special Resource Study and Environmental Assessment. <http://parkplanning.nps.gov/document.cfm?documentID=43639>.

¹⁸ California State Parks. 2012, September 28. Topanga State Park General Plan and Environmental Impact Report. Chapter Two: Existing Conditions and Issues. <http://www.parks.ca.gov/pages/21299/files/02finalgp-ch2.pdf>.

5. Environmental Analysis CULTURAL RESOURCES

and plant fossils. Most are from the Pleistocene epoch (Ice Age) and date as far back as 40,000 years. Finds include mammoths, saber-tooth cats, insects, and birds.¹⁹

Cultural Setting

Prehistoric Archaeological Setting

The ancestors of the Gabrielino-Tongva Tribe occupied the entire Los Angeles Basin and were hunters and gatherers. Small encampments to large village sites have been identified throughout the area, some dating back over 5,000 years.

Historical Setting

The occupation of Los Angeles County by nonnatives began with the colonization of California, the expedition in 1769 to build a series of missions along the coast, and in 1781 when a group of 44 settlers founded the town of Our Lady the Queen of the Angels (El Pueblo de Nuestra Señora la Reina de Los Angeles de Prociuncula). This rich history has resulted in many significant archaeological and built-environment resources in the Los Angeles area. Table 3.5-1 provides a chronology of key events in history for the greater Los Angeles basin.

Table 5.5-1 Chronology for the Los Angeles Area and LAUSD

Date	Description
5000 BC-1769	Ancestors of the Gabrielino-Tongva occupied all of Los Angeles County
Ca. 1500 A.D.	
1500	Thousands of Gabrielino-Tongvas reside in the area that will become Southern California. The Chumash live along the coast from Malibu north; the Gabrielino-Tongva live along the coast from Malibu south to El Toro and inland to the San Gabriel Mountains; and the Tafaviam reside in and around the San Fernando Valley.
1542	First European contact when Spanish explorer Juan Rodriguez Cabrillo lands on Catalina Island; followed in the 1700s by numerous expeditions and the beginnings of the Mission Period (1769).
1700 A.D.	
1765	King Carlos of Spain executes orders to colonize California so that Spanish claim over the region would not be lost.
1769	Spanish land expedition into California led by Gaspar de Portola to scout El Camino Real, the series of Franciscan missions to be built along coast. Two Spanish soldiers, Juan Jose Dominguez and Francisco Xavier Sepulveda, and Spain's first mission padre, Father Juan Crespi, were part of the group.
August 5, 1769	Portola crossed the Santa Monica Mountains and came upon a valley they named El Valle de Santa Catalina de Bononia los Encinos, part of what is now San Fernando Valley.
1771	Mission San Gabriel Archangel (San Gabriel Mission) was founded in 1771. Spaniards referred to the Tongva as Gabrielinos, whom they sought to Christianize.
September 4, 1781	El Pueblo de Nuestra Señora la Reina de Los Angeles de Prociuncula, or the town of Our Lady the Queen of the Angels of the Prociuncula, was founded by Los Pobladores, a group of 44 settlers, and established as an official pueblo by Spanish Governor Felip de Neve.
1783	Francisco Xavier Sepulveda retired from Spanish army and made his home in Los Angeles.

¹⁹ City of Los Angeles. 2001, September. Conservation Element of the City of Los Angeles General Plan. <http://planning.lacity.org/cwd/gnpln/ConsvElt.pdf>.

5. Environmental Analysis

CULTURAL RESOURCES

Table 5.5-1 Chronology for the Los Angeles Area and LAUSD

Date	Description
1784	Juan Jose Dominguez received the first Spanish land grant of 75,000 acres, the land south of El Pueblo de Los Angeles. Rancho San Pedro consisted of 75,000 acres. Sepulveda's grandson Jose received permission to raise cattle in the southern part of the rancho.
1797	San Fernando Rey de España Mission (Mission San Fernando) established within the boundaries of the modern-day Los Angeles.
1800 A.D.	
1809	Juan Jose Dominguez died and left Rancho San Pedro to Cristobal Dominguez, who later named his son Manuel Dominguez as executor.
1810	Beginning of Mexican War of Independence from Spain
1817	Ordered by Pablo Vicente de Salo, California's last Spanish governor, first primary school opened in Los Angeles.
1821	Spanish rule in California overthrown by Mexico.
1823	Mexican declaration of the Republic of Mexico.
1824	Jose Dolores Sepulveda was killed and ten years later, his heirs were awarded 32,000 acres of Rancho San Pedro, which they named Rancho de Los Palos Verdes.
1825	The Republic of Mexico claimed California as an official territory. During Mexican rule from 1825–1847, rancheros became wealthy from trade with labor provided by Native Americans.
1827	Under Mexican rule, a second school opened, admitting female pupils and teachers.
1831	Spanish Governor Manuel Victoria overthrown in "The Battle of Los Angeles." California divided into northern and southern provinces. Pio Pico became governor of southern province.
1835	Mexican Congress established Los Angeles a ciudad.
1836	Civil war broke out between northern and southern provinces of California.
1845	War ended with the battle at Cahuenga Pass. Spanish Governor Micheltorena was overthrown and replaced by Pio Pico, who was made governor of entire state.
1846	United States declared war on Mexico. Pio Pico sold almost the entire San Fernando Valley for \$14,000 to Eulogio de Celis.
1848	War ends with Treaty of Guadalupe Hildago, and California established an official U.S. territory.
April 4, 1850	Los Angeles incorporated as an American city, population 1,600.
1852	American public school system established in Los Angeles.
1854	Pio Pico's brother Andres acquired the southern portion of the Valley, which he then transferred back to Pico.
1856–57	Four schools open in Los Angeles County.
1850–1870	Los Angeles economy centered around agriculture of ranchos. As cash economy replaced Mexican barter economy, ranchos forced to mortgage land for money. By 1865, most ranchos transferred to American ownership. The Sepulvedas were forced to foreclose, losing their land to Anglo developers. A period of slow growth; school building in Los Angeles suffered due to lack of state resources, drought, and floods.
1858	Manuel Dominguez sold a portion of Rancho San Pedro to Phineas Banning, who founded Wilmington near San Pedro. The rest of Rancho San Pedro stayed in the Dominguez family until Manuel's daughter married Henry Carson, who assumed management of the rancho.
1860s	Construction of Los Angeles-San Pedro Railroad. Development of San Pedro Harbor increased trade and transportation, which allowed for creation of such communities as Compton and Carson.
1869	Southern Pacific Railroad completed transcontinental railroad to San Francisco. Pio Pico sold his share of the San Fernando Valley to investors led by Isaac B. Lankershim for \$2/acre. Lankershim acquired Valley's southern half and planted world's largest wheat-growing empire with partner Isaac Newton Van Nuys. Los Angeles Board of Education established.
1872	State legislature passed "Act to Enforce the Educational Rights of Children," making education compulsory.
1873	First high school opened in Los Angeles at Temple and Beaudry.

5. Environmental Analysis
 CULTURAL RESOURCES

Table 5.5-1 Chronology for the Los Angeles Area and LAUSD

Date	Description
1874	Northern half of San Fernando Valley sold to Senator Charles MacLay and George K. Porter. MacLay founded Valley's first township, San Fernando.
1876	Southern Pacific Railroad reached Los Angeles, followed by the Santa Fe Railway, sparking the city's first real estate boom. By 1889 the boom was over, but Los Angeles had been put on the American map. First kindergarten opened.
1881	The Los Angeles State Normal School opened for the education of teachers, eventually becoming the University of California at Los Angeles.
1882	MacLay divided northern portion of San Fernando Valley with partners George and Benjamin Porter.
Late 1800s	Major progress made in establishment of Los Angeles infrastructure. Water supplies increased. Discovery of oil stimulated economy. General prosperity reflected by growth in school system, with 40 percent increase in enrollment. Los Angeles City School District established.
1889	Los Angeles High School built.
1890	Population grows to 50,395 and doubles to 102,479 by 1900.

5. Environmental Analysis

CULTURAL RESOURCES

Table 5.5-1 Chronology for the Los Angeles Area and LAUSD

Date	Description
1900 A.D.	
Early 1900s	Arrival of the automobile and Henry E. Huntington's Pacific Electric Railway Company, which linked Los Angeles communities by network of rail cars. Los Angeles became primarily a tourist town. Movie business established its roots.
1904	Leslie C. Brand, founder of the City of Glendale, purchased portion of George Porter's land and later helped construct the line of Pacific Electric railway from downtown Los Angeles via Van Nuys to San Fernando.
1909	<i>Los Angeles Times</i> executives Harrison Gray Otis and Harry Chandler paid \$53/acre for 47,500 acres of the Valley's southern half in what was most significant subdivision in history of the city. The City of Los Angeles annexed a shoestring strip of land extending south to San Pedro. The towns of Wilmington and San Pedro were both annexed, and the port became Port of Los Angeles.
1910	Newly formed City School District encompassed over 85 square mile with enrollment of 46,500.
1911	Manuel Dominguez's grandson John Manuel Carson sold 2,800 acres to the Torrance-Marshall Company.
1913	Water brought into Los Angeles from Owens Valley via William Mulholland's Los Angeles Aqueduct, the largest municipal water system in the country, luring surrounding communities into annexation.
1915	San Fernando Valley annexed by City of Los Angeles.
1916	Los Angeles School District covered 400 square miles, with enrollment of 78,658.
1920s	Economy boosted by oil, movies, and aerospace. Wave of immigration to the region between 1920 and 1940 described as largest internal migration in history of United States. Construction of Hoover Dam brought electricity to area. By 1920, 100,000 automobiles registered in Los Angeles and 150 new miles of road built. Los Angeles City Planning Commission approved 40 new subdivisions a week. Oil refineries built in San Pedro, Carson, Torrance, and El Segundo. Los Angeles School District experienced rapid growth, regularly annexing new schools every year or two. By 1925, enrollment exceeded available school capacity.
1929	Establishment of first community college, Los Angeles Junior College, by Los Angeles School District.
1930	Throughout Depression, migration into area continued. Los Angeles fifth largest city in U.S. with population 1.3 million attracting immigrants from both inside and outside the country. Los Angeles School District covered 1,039 square miles, three times the size of the City of Los Angeles. Enrollment reached 404,351. School facilities totaled 350.
1933	Long Beach earthquake. 40 school buildings demolished. Los Angeles School District implemented a phased school building reconstruction program. Field Act was passed to protect school buildings from future earthquakes, leading to state oversight of school building activities.
1935	Los Angeles School District enrolled 300,000 housed in 384 schools, serving an area of over 1,095 square miles. District contracted in next decade as cities such as Beverly Hills, Torrance and Culver City split off into individual districts. Enrollment, however, continued to increase.
1940	First freeway in western United States, Arroyo Seco Parkway (the Pasadena Freeway) opened, followed by San Gabriel and Hollywood Freeways later that decade.
1941–1945	World War II brings modern industrial phase of Los Angeles. Spurt of population growth and war-related industrial expansion. San Fernando Valley continues to be dominated by agriculture.
1950s	After the war, economic development continued, predominantly in aerospace and electronics. Established industries such as agriculture, petroleum, and fishing became less important. As growth continued, developers built new communities for expanding work force. Valley was rapidly becoming fastest growing area in the country as agriculture in the area was replaced by manufacturing. The southern area also experienced rapid growth, and as a result of growing work force, large areas of tract housing were quickly built. Developing suburbs were to align themselves with existing Los Angeles School District. School building construction, which had slowed during the war, exploded.
1960	Ethnically diverse population without a single majority grown to 2,479,015.
1970	Economy continued to diversify. With end of Cold War, decline in aerospace industry. Expansion of manufacturing, television and music recording, and service industries. Agriculture continued to give way to suburban subdivisions and retail centers. South area continued with development of industrial, office, recreational, and retail centers.

5. Environmental Analysis CULTURAL RESOURCES

Table 5.5-1 Chronology for the Los Angeles Area and LAUSD

Date	Description
1984	Los Angeles displaced Chicago as America's second largest city.
1990s–2000s	Population growth continued with influx of immigrants from all over the world. Los Angeles still the second most populated city, rivaled only by New York, and spread out over the greatest municipal area in the country. LAUSD served more than 720,000 students in a 704-square-mile area.

Source: 2004 New School Construction Program EIR. Adopted June 2004.

LAUSD 2004 Historic Resources Survey

Of the over 700 campuses and administrative complexes operated by the District in 2002, 410 contain permanent buildings which are at least 45 years or older. The LAUSD conducted an inventory of existing schools to determine the age and historical significance.²⁰ The survey was performed in two phases. Phase 1 identified all LAUSD campuses and properties with buildings that were 45 years or older, in accordance with Office of Historic Preservation guidelines for local surveys. Previously completed documentation, including significance evaluations made by OHP in consensus with the Federal Emergency Management Agency following the 1994 Northridge Earthquake, was compiled and incorporated into the resulting database of 409 properties. A historical context statement was prepared, and approximately half of the 409 properties were evaluated and a quarter of these were recorded on standard California historic resources inventory forms (form DPR 523A Primary Record). Phase 2 evaluated and recorded the remaining properties.

LAUSD 2014 Historic Resources Survey (Draft)

In July 2013, in anticipation of the SUP, LAUSD began the process of updating the survey of historic resources in the District.²¹ This process includes developing an updated Historic Context Statement, conducting historic resource surveys of 55 campuses that were not evaluated during the 2002 survey, and preparing design and procedural guidelines to help guide SUP planning efforts and CEQA analysis process

Potential eligibility of schools under Criteria A/1, as outstanding examples of LAUSD design ideals and principles. The history and context of Los Angeles public school design and educational architecture are the particular focus of the 2014 study. Because the postwar era largely fell outside the scope of the 2002 LAUSD historic context statement, this era was examined in detail in the 2014 study.

The study represents not a comprehensive history but rather a first step in better understanding the evolution of school design in the district. Project limitations precluded extensive research on additional aspects of LAUSD's history that might result in eligibility under Criteria A/1 and Criteria B/2. Campus-specific research was conducted on all pertinent topics for each of the schools surveyed. The study includes a section on the typical architectural styles of LAUSD schools to analyze Criteria C/3.

²⁰ See Appendix B-2 for the LAUSD 2002 Survey

²¹ See Appendix B-1 for the LAUSD 2014 Draft Survey

5. Environmental Analysis

CULTURAL RESOURCES

Themes of Significance

The following themes of significance were prepared for LAUSD school property types.

Founding Years, 1875–1894

This theme is embodied in Los Angeles’s remaining one- and two-story wood-frame schoolhouses that generally display Late Victorian or vernacular styles. Only three nineteenth-century schoolhouses are known to remain from LAUSD’s founding years. Schools constructed during this period display traditional modes of school design, before the Progressive Education Movement and widespread reform changed national construction standards and before increased urbanization necessitated larger-capacity school plants.

Pre–1933 Long Beach Earthquake School Plants, 1910–1933

This theme reflects an important period for Los Angeles schools. First, it occurred after the Progressive Education Movement had triggered widespread reform of school design throughout the United States. This resulted in a more differentiated, expansive school plant, with specialized facilities and program-specific buildings and classrooms; this ended the era of the monumental, big-block school. Second, this period occurred before a statewide overhaul of school building codes and practices after the 1933 Long Beach earthquake.

This period also began as the 1920s ushered in a school building boom and period-revival golden age in Southern Californian architecture. The importance placed on public education was expressed through beautifully designed school buildings, often created by the region’s leading architects. Campus design became more unified, with elaborate approaches and entrances. The advent of more grand entrances, as well as the incorporation of separate auditoriums, sited for ease of public access, reflected a growing sense that public education was a community affair.

Replacing the big-block school, with internal corridors, was a generally lower-massed, spread-out campus. In some examples, designers replaced hallways with covered outdoor walkways. Building plans also evolved, as the traditional rectangular plan took on adjacent wings, in H-shaped, T-shaped, or U-shaped buildings that facilitated the creation of sheltered outdoor spaces and patios. Lower massing was particularly common for elementary schools.

Because most pre-1933 schools were substantially remodeled following the Long Beach earthquake, intact examples from this era are relatively rare. It is common to find 1920s-era schools that were remodeled following the earthquake; such schools might exhibit the building plans and configurations typical of the 1920s but with 1930s PWA Moderne and Streamline Moderne detailing

Post–1933 Long Beach Earthquake Schools, 1933–1945

Following the 1933 Long Beach earthquake, state and city legislation regarding school building codes and practices shifted the character of LAUSD schools and campuses. Requirements of the Field Act (1934), such as maintaining one-story massing for elementary schools and no more than two stories for junior and high schools, mirrored reforms already under way. Classroom wings continued to be designed for connections to the outdoors, with L-, H-, U-, and T-shaped buildings accommodating sheltered courtyard and patio spaces.

5. Environmental Analysis CULTURAL RESOURCES

Continuing another trend under way in the 1920s, campuses displayed an increasingly unified site design, with sheltered corridors linking campus buildings.

The advances of the Progressive Education Movement also continued to shift school plant design. Campuses were increasingly differentiated, with administration buildings, auditoriums and gymnasiums, separate classroom, shop, and specialty wings, and cafeterias. Adequate indirect lighting and ventilation were provided through the use of generous bands of windows, including multilight sashes, casements, and clerestories. Stylistically, these buildings were less ornamental than their 1920s period-revival counterparts. An emphasis was placed on traditional Southern Californian styles, such as the Spanish Colonial and Mission Revival. Other styles included Streamline Moderne, Art Deco, and Late Moderne. Much post-earthquake reconstruction was funded through the Public Works Administration (PWA), and many schools exhibit a range of PWA Moderne styles.

Early Experiments in the Modern, Functionalist School, 1933–1945

Although this category shares general characteristics with the preceding theme (Post–1933 Long Beach Earthquake Schools), it is distinguished by an experimental approach to school design that emerged during the Great Depression. Such schools reflect the most avant-garde ideas of the era and the beginning of modern, functionalist school design. Stylistically, the proto-modernist school need not be purely “modern” in the sense of lacking any ornamental detailing. The significant changes reflected a philosophy that went a step further than did the schools of the 1920s in designing for function and integrating school buildings with exterior spaces. During the postwar construction boom, many of the same ideas that characterized these experimental schools became the norm throughout Los Angeles and the United States.

The notable differences between the two themes (or periods) relate to scale, site plan, and functional, child-centered design. The proto-modernist school has an explicitly domestic scale, with low ceilings and a lack of monumental design or massing. These schools generally exhibit a decentralized, nonhierarchical campus, with a strong geometric patterning applied to the site plan. Classroom wings generally consist of one-room-deep rectilinear buildings, lined with adjacent patios and landscaping. Building plans clearly express their function, with (usually) one-story massing, generous expanses of glazing, window sizes and configurations tailored to sun patterns and doors opening directly onto patio areas and courtyards. The preferred typology was the early version of the “finger-plan” school, with rectilinear classroom wings extending from a central axis

Educating the Baby Boom: The Postwar modern Functionalist School Plant, 1945–1969

By the 1950s, many of the design ideas considered experimental in the 1930s had matured and become the national standard for schools. Stylistically, schools might include some historicist detailing reflecting popular styles (such as Colonial Revival). But, overall, a unified campus design, building types and plans that accommodated a high degree of indoor-outdoor integration, ample outdoor spaces, and sheltered corridors marked the typology as the mature version of the functionalist school plant. The priority remained the creation of a domestic scale for schools. Campuses displayed a one-story massing for elementary schools, and up to two stories for middle and high schools. Site plans, which often featured a decentralized, pavilion-like layout, lacked the formality and monumentality that characterized earlier eras of school design.

5. Environmental Analysis

CULTURAL RESOURCES

School types expressive of these ideals include the finger-plan (1940s–1950s) and cluster-plan (1950s), and variations on their basic themes. Combinations of these basic forms, which flexed according to available lot size and school enrollment, are also evident.

For LAUSD, the postwar years brought another round of reform as well as unprecedented expansion. Given the postwar classroom shortage, many campuses were constructed quickly, from standardized plans used district-wide, in designs that convey some of these ideas. The most intact and well-designed campuses among these, though, uniquely represent this era of reform and the midcentury modern school.

LAUSD and the Civil Rights Movement, 1954–1980

This theme of significance begins with the filing of the landmark U.S. Supreme Court case *Brown v. The Board of Education, Topeka, Kansas*. Although *Brown v. Board of Education* addressed state laws that did not exist in California—namely, laws allowing for racially segregated public schools—this case and the Civil Rights Movement helped generate and focus attention on related issues in Los Angeles. Issues touched on racial division and cultural identity, equal access, and how to create more balance and diversity in public schools. Signaling the end of this period of significance is the U.S. Supreme Court decision effectively ending mandatory school busing as a solution to racial imbalance in California’s public schools. Although this issue continued to form part of the social context for LAUSD, this period captures an era of intense debate and activism on the part of community members, parents, politicians and jurists, as well as teachers and administrators.

A school eligible under this theme might be the site of significant integration initiatives, challenges, or community activities related to the Civil Rights Movement and school integration. This might include initiatives for equal access to schools and/or to employment opportunities in LAUSD schools.

In addition, a school might qualify under this theme for a long-term association with a figure who was significant in the Civil Rights Movement and school integration.

LAUSD Historical Resources Table 5.5-2 provides the results of the 2004 inventory. Each of the campuses or properties listed had one or more buildings that were identified as historically significant, meeting the criteria for listing in the NRHP or the CRHR or both. Additional schools may be added to this list as more research is performed or as additional schools meet the criteria. Table 5.5-2 also shows that there are more sites listed as historically significant in the Central area of the district than in the Valley and the South areas.

~~The Valley Area described in Table 5.5-2 corresponds to the current NorthESC; the Central Area corresponds to the East and West ESC except for the southeastern portion of the West ESC; and the South Area corresponds to the South ESC plus the southeastern portion of the West ESC.~~

5. Environmental Analysis
CULTURAL RESOURCES

Table 5.5-2 2004 Schools Identified as Historically Significant

Campus Name	School Type	Street Number	Street Direction	Street Name	Street Type	City	ZIP		CHRSC
Valley Area (current Northwest and Northeast Local Districts North ESC)									
Canoga Park	ES	7438		Topanga Canyon	Bld	Canoga Park	91303		2S2
Canoga Park	SH	6850		Topanga Canyon	Bld	Canoga Park	91303		3CS
Carpenter Avenue	ES	3909		Carpenter	Ave	Studio City	91604		2S2
Kester Avenue	ES	5353		Kester	Ave	Van Nuys	91411		3CS
Lankershim	ES	5250		Bakman	Ave	North Hollywood	91601		5S3
Lokrantz, Sven Special Ed Ctr.	SS	19451		Wyandotte	St	Reseda	91335		3CS
Morningside	ES	576	N	MacLay	Ave	San Fernando	91340		2S2
North Hollywood	SH	5231		Colfax	Ave	North Hollywood	91601		2S2
Pacoima	ES	11016		Norris	Ave	Pacoima	91331		3CS
Reed, Walter	MS	4525		Irvine	Ave	North Hollywood	91602		3S
Reseda	ES	7265		Amigo	Ave	Reseda	91335		2S2
San Fernando	MS	130	N	Brand	Bld	San Fernando	91340		2S2
17th Street	ES	644	W	17th	St	Los Angeles	90015		2S2
Van Nuys	SH	6535		Cedros	Ave	Van Nuys	91411		3S
Verdugo Hills	SH	10625		Plainview	Ave	Tujunga	91042		3S
Central Area (Current West, Central, and East Local Districts East and West ESC except for the southeastern portion of the West and the southern portion of the East Local Districts ESC)									
2nd Street	ES	1942	E	2nd	St	Los Angeles	90033		2S2
10th Street	ES	1000		Grattan	St	Los Angeles	90015		3CS
24th Street	ES	2055	W	24th	St	Los Angeles	90018		2S2
49th Street	ES	750	E	49th	St	Los Angeles	90011		3CS
Adams, John	MS	151	W	30th	St	Los Angeles	90007		3CS
Aldama	ES	632	N	Avenue 50		Los Angeles	90042		3S
Alta Loma	ES	1745		Vineyard	Ave	Los Angeles	90019		3S
Arlington Heights	ES	1717		Seventh	Ave	Los Angeles	90019		2S2
Berendo	MS	1157	S	Berendo	St	Los Angeles	90006		3S
Broadway	ES	1015		Lincoln	Bld	Venice	90291		3CS
Buchanan Street	ES	5024		Buchanan	St	Los Angeles	90042		2S1
Burroughs, John	MS	600	S	McCadden	Pl	Los Angeles	90005		3S
Dorris Place	ES	2225		Dorris	Pl	Los Angeles	90031		3S
Eagle Rock	ES	2057		Fair Park	Ave	Los Angeles	90041		3CS
El Sereno	MS	2839	N	Eastern	Ave	Los Angeles	90032		3S
Euclid Avenue	ES	806		Euclid	Ave	Los Angeles	90023		3CS
Garvanza	ES	317	N	Avenue 62		Los Angeles	90042		2S2
Glassell Park	ES	2211	W	Avenue 30		Los Angeles	90065		3S
Grant	ES	1530	N	Wilton	Pl	Los Angeles	90028		2S2
Hamasaki, Morris K.	ES	4865	E	First	St	Los Angeles	90022		3S
Hamilton, Alexander	SH	2955	S	Robertson	Bld	Los Angeles	90034		2S2
Hancock Park	ES	408	S	Fairfax	Ave	Los Angeles	90036		2S2
Hobart Boulevard	ES	980	S	Hobart	Bld	Los Angeles	90006		3CS
Hollenbeck	MS	2510	E	6th	St	Los Angeles	90023		2S2
Hollywood	SH	1521	N	Highland	Ave	Los Angeles	90028		3S

5. Environmental Analysis CULTURAL RESOURCES

Table 5.5-2 2004 Schools Identified as Historically Significant

Campus Name	School Type	Street Number	Street Direction	Street Name	Street Type	City	ZIP		CHRSC
Irving, Washington	MS	3010		Estara	Ave	Los Angeles	90065		3S
Jefferson, Thomas	SH	1319	E	41st	St	Los Angeles	90011		3S
LA CES/Pasteur, Louis	Mag	5931	W	18th	St	Los Angeles	90035		2S2
Los Feliz	ES	1740	N	New Hampshire	Ave	Los Angeles	90027		2S2
Marshall, John	SH	3939		Tracy	St	Los Angeles	90027		2S2
Nightingale, Florence	MS	3311	N	Figueroa	St	Los Angeles	90065		3CS
Old Canyon School	N/A	421		Entrada	Dr	Santa Monica	90402		3S
Old Farmdale School	N/A	2839	N	Eastern	Ave	Los Angeles	90032		3S
Old Vernon Avenue School	N/A	450	N	Grand	Ave	Los Angeles	90012		3S
Pacific Palisades	ES	800		Via de la Paz		Pacific Palisades	90272		3S
Perez, Alfonso B. Special Education Center	SS	4540		Michigan	Ave	Los Angeles	90022		3CS
Santa Monica Boulevard	ES	1022	N	Van Ness	Ave	Los Angeles	90038		2S2
Solano Avenue	ES	615		Solano	Ave	Los Angeles	90012		3CS
Soto Street	ES	1020	S	Soto	St	Los Angeles	90023		2S2
University	SH	11800		Texas	Ave	Los Angeles	90025		2S2
Utah Street	ES	255	N	Clarence	St	Los Angeles	90033		3CS
Van Ness	ES	501	N	Van Ness	Ave	Los Angeles	90004		2S2
Venice	SH	13000		Venice	Bld	Los Angeles	90066		3S
Vine Street	ES	955	N	Vine	St	Los Angeles	90038		2S2
Virgil	MS	152	N	Vermont	Ave	Los Angeles	90004		3S
West Vernon Avenue	ES	4312	S	Grand	Ave	Los Angeles	90037		3CS
Wright, Orville	MS	6550	W	80th	St	Los Angeles	90045		3S
Yorkdale	ES	5687		Meridian	St	Los Angeles	90042		3CS
South Area (current South Local District ESC plus southeast part of West Local District and southern part of East Local District ESC)									
52nd Street	ES	816	W	51st	St	Los Angeles	90037		3S
66th Street	ES	6600	S	San Pedro	St	Los Angeles	90003		3S
109th Street	ES	10915		McKinley	Ave	Los Angeles	90059		3S
Angeles Mesa	ES	2611	W	52nd	St	Los Angeles	90043		2S
Baldwin Hills	ES	5421		Rodeo	Rd	Los Angeles	90016		3S
Bandini Street	ES	425	N	Bandini	St	San Pedro	90731		2S2
Barton Hill	ES	423	N	Pacific	Ave	San Pedro	90731		3S
Bell	SH	4328		Bell	Ave	Bell	90201		3CS
Bryson Avenue	ES	4470		Missouri	Ave	South Gate	90280		3CS
Carson Street	ES	161	E	Carson	St	Carson	90745		3CS
Cienega	ES	2611	S	Orange	Dr	Los Angeles	90016		S
Corona Avenue	ES	3825		Bell	Ave	Bell	90201		3S
Dorsey, Susan Miller	SH	3537		Farmdale	Ave	Los Angeles	90016		3S
Eshelman Avenue	ES	25902		Eshelman	Ave	Lomita	90717		2S2
Fremont, John C.	SH	7676	S	San Pedro	St	Los Angeles	90003		3S
Fries Avenue	ES	1301		Fries	Ave	Wilmington	90744		3CS
Gompers, Samuel	MS	234	E	112th	St	Los Angeles	90061		2S2
Graham	ES	8407	S	Fir	Ave	Los Angeles	90001		3CS

5. Environmental Analysis
CULTURAL RESOURCES

Table 5.5-2 2004 Schools Identified as Historically Significant

Campus Name	School Type	Street Number	Street Direction	Street Name	Street Type	City	ZIP		CHRSC
Gulf Avenue	ES	828	W	L	St	Wilmington	90744		2S2
Huntington Park	SH	6020		Miles	Ave	Huntington Park	90255		3S
Jordan, David Starr	SH	2265	E	103rd	St	Los Angeles	90002		3CS
Lomita Fundamental Magnet	ES	2211	W	247th	St	Lomita	90717		3CS
Mann, Horace	MS	7001	S	St. Andrews	Pl	Los Angeles	90047		3CS
Manual Arts	SH	4131	S	Vermont	Ave	Los Angeles	90037		2S2
Miramonte	ES	1400	E	68th	St	Los Angeles	90001		2S2
Muir, John	MS	5929	S	Vermont	Ave	Los Angeles	90044		3CS
Point Fermin	ES	3333		Kerckhoff	Ave	San Pedro	90731		3CS
Ritter	ES	11108		Watts	Ave	Los Angeles	90059		2S2
San Gabriel Avenue	ES	8628		San Gabriel	Ave	South Gate	90280		3CS
San Pedro	AS	950	W	Santa Cruz	St	San Pedro	90731		2S2
South Gate	MS	4100		Firestone	Bld	South Gate	90280		2S2
South Gate	SH	3351		Firestone	Bld	South Gate	90280		3S
South Park	ES	8510		Towne	Ave	Los Angeles	90003		3CS
State Street	ES	3211		Santa Ana	St	South Gate	90280		3CS
State Street Children's Center	CC	3210		Broadway		Huntington Park	90255		3CS
State Street Children's Center	ES	3210		Broadway		Huntington Park	90255		3CS
Vernon City	ES	2360	E	Vernon	Ave	Los Angeles	90058		3CS
Virginia Road	ES	2925		Virginia	Rd	Los Angeles	90016		3S

CHRSC Status Codes:

2S: Individual property determined eligible for the National Register by the Keeper. Listed in the California Register.

2S2: Individual property determined eligible for the National Register by a consensus through Section 106 process. Listed in the California Register.

3CS: Appears eligible for the California Register as an individual property through survey evaluation.

The 2014 Historic Resources Survey found that the following 15 of 56 LAUSD campuses appear eligible for either the National Register and/or the California Register

- 156th Street Elementary School.....Eligible for California Register (3CD)
- Castle Heights Elementary SchoolEligible for California Register (3CD)
- Chatsworth Senior High SchoolEligible for National Register (3D)
- Cleveland Senior High School.....Eligible for National Register (3D)
- Colfax Avenue Elementary School.....Eligible for California Register (3CD)
- Dodson Middle School.....Eligible for California Register (3CD)
- Fernangeles Elementary School.....Eligible for California Register (3CD)
- Leapwood Avenue Elementary School.....Eligible for National Register (3D)
- Narbonne Senior High School.....Eligible for California Register (3CD)
- Olive Vista Middle SchoolEligible for California Register (3CD)
- Pacoima Middle SchoolEligible for California Register (3CD)

5. Environmental Analysis

CULTURAL RESOURCES

- Palisades Senior High SchoolEligible for National Register (3D)
- Parmelee Avenue Elementary SchoolEligible for California Register (3CD)
- Topanga Charter Elementary School.....Eligible for National Register (3D)
- Webster Middle SchoolEligible for California Register (3CD)

Of the 41 campuses found ineligible for listing in the National or California Registers:

- Three campuses were found to meet the eligibility standards described for postwar LAUSD schools in the LAUSD Historic Context Statement but did not retain sufficient integrity to convey their period of significance; these campuses did not qualify under other applicable criteria;
- Thirty-eight were found not eligible under applicable criteria, including the context of institutional architectural/educational facilities in Los Angeles as described in the LAUSD Historic Context Statement.

Paleontological Resource Setting

Paleontological resources are fossils, that is, evidence of past life on earth, including bones, shells, leaves, tracks, burrows, and impressions. The La Brea Tar Pits, one of the best-known discovery sites of ice-age fossils in the world, is described above in Section 5.5.1.2, *Natural Setting*. Many fossil-containing rock formations in the Santa Monica Mountains are described in the “Santa Monica Mountains National Recreation Area Paleontological Survey” conducted by the National Park Service in 2004. Over 2,300 fossil localities have been found within the Santa Monica Mountains National Recreation Area (SMMNRA); the eastern part of the SMMNRA is within the District. Fossils described range in age from late Jurassic to Quaternary. (The Jurassic Period extends from 200 million to 146 million years before present, and the Quaternary Epoch extends from 1.8 million ybp to the present.) Types of fossils include mollusks, sand dollars, barnacles, plants, wood, mammals, algae, crabs and other crustaceans, fishes including sharks, whales, sea lions, horses, birds, rodents, camel, bison, tapir, mammoth, mastodon, and giant ground sloth. Two fossil localities are described in the aforementioned paleontological survey: Fossil Ridge Park and Old Topanga Canyon, both in the District.²² Most fossil localities in the City of Los Angeles are in local mountains.²³

5.5.2 Thresholds of Significance

CEQA Guidelines Section 15064.5 provides direction on determining significance of impacts to archaeological and historical resources. Generally, a resource shall be considered “historically significant” if the resource meets the criteria for listing on the CRHR, including the following:

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

²² National Park Service. 2004, January. Santa Monica Mountains National Recreation Area Paleontological Survey. http://www.nature.nps.gov/geology/paleontology/surveys/SAMO_survey_2_low_res.pdf.

²³ City of Los Angeles. 2001, September. Conservation Element of the City of Los Angeles General Plan. <http://planning.lacity.org/cwd/gnpln/ConsvElt.pdf>.

5. Environmental Analysis CULTURAL RESOURCES

- Is associated the with lives of persons important in our past;
- 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
- Has yielded, or may be likely to yield, information important in prehistory or history.

The fact that a resource is not listed in, or determined to be eligible for listing in the CRHR, or is not included in a local register of historical resources, does not preclude a lead agency from determining that the resource may be a historical resource.²⁴

According to CEQA Guidelines Appendix G a project would normally have a significant effect on the environment if the project would:

- CUL-1 Cause a substantial adverse change in the significance of an historical resource pursuant to Section 15064.5.
- CUL-2 Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5.
- CUL-3 Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.
- CUL-4 Disturb any human remains, including those interred outside of formal cemeteries.

5.5.3 Environmental Impacts

The applicable thresholds are identified in brackets after the impact statement.

Impact 5.5-1: SUP-related projects may cause a substantial adverse change in the significance of historical resources. [Threshold CUL-1]

All Projects Involving Historic Resources

The SUP may result in demolition or destruction of historical resources; relocation, conversion, rehabilitation, or alteration of historical resources that substantially impairs the significance of the resources; and/or changes to the immediate surroundings of a historical resource that materially impairs the significance of the resource.

Potential new school sites, sites for expansions of existing schools, and existing schools throughout the District contain historical resources. The degree and kind of any impacts to historical resources under the SUP depends on the specific sites selected and the nature of the historical resources, if any, in or next to those sites.

²⁴ Public Resource Code, Section 5024.1; 14 CCR Section 4852.

5. Environmental Analysis

CULTURAL RESOURCES

LAUSD has not identified site-specific projects to be constructed under the SUP; therefore, the nature and magnitude of any historical resource impacts, if any, cannot be determined. However, the potential for significant impacts does exist. Based on this potential this analysis describes: (1) the methodology for site-specific determinations for presence or absence of historical resources; (2) project design features or other LAUSD procedures that apply performance standards to reduce impacts during site selection and design phase when a site is identified as containing historical resources

As required by CEQA Guidelines Section 15168 (c), once a new school site is identified for acquisition or an existing school campus is identified for modification, the LAUSD conducts a historic resource review pursuant to the LAUSD Cultural Resource Assessment Procedures.²⁵ These procedures ensure that any potential historical resources will be identified using qualified professionals (architectural master reviewer, archaeological master reviewer, qualified architectural historian) and a consistent methodology. The method for identifying cultural resources includes site reconnaissance, an evaluation of CRHR eligibility, and, where required, an intensive survey

When a historical resource is identified, LAUSD must consider: (1) whether the proposed project would result in potentially significant impacts on the historical resources, and (2) if so, whether project design alternations or other feasible measures or alternatives would avoid or substantially reduce the impacts. Each project that may impact an historic resource will include implementation of ~~LAUSD OEHS CEQA Specification Manual, Appendix H, Historical Resources and~~ ~~PDFSC-CUL-1 through SC-PDF-CUL-9-11~~ for measures that reduce impacts caused by relocation, conversion, rehabilitation, alteration, damage or demolition of an historical resource.

If, after consideration of all feasible measures and alternatives, that historic resource impacts are unavoidable, then prior to project approval a CEQA Statement of Overriding Consideration (SOC) must be adopted by the Board of Education. The SOC must outline the benefits of the project and why they outweigh the significant historic resource impact. Because there are no measures available that would avoid, reduce, rectify, or minimize the possible demolition or permanent damage to an historic building or structure or the cumulative loss of historic resources in the District, this impact is considered potentially significant and may not be feasibly mitigated to a level of insignificance.

Impact 5.5-2: SUP implementation would not cause a substantial adverse change in the significance of archaeological resources. [Threshold CUL-2]

All Projects Involving Grading, Excavation, or Other Ground-Disturbing Activities

Grading, excavation, or other ground-disturbing activities during construction could damage previously undiscovered archaeological resources. Site-specific impacts cannot be determined until a location is identified for a project. However, the potential for significant impacts does exist. Based on this potential this analysis describes: (1) the methodology for site-specific determinations for presence or absence of archeological

²⁵ LAUSD OEHS CEQA Specification Manual, Appendix H-Historical Resources Policy, (Appendix E.2) LAUSD *Cultural Resource Assessment Procedures*. December 2005, Revised June 2007.

5. Environmental Analysis CULTURAL RESOURCES

resources; (2) project design features or other LAUSD procedures that apply performance standards to reduce impacts when a site is identified as having the potential to affect archeological resources.

Once a new school site is identified for acquisition or an existing school site is identified for modification, the LAUSD conducts an archeological resource review pursuant to the LAUSD Cultural Resource Assessment Procedures. The procedures ensure that unique archaeological resources would be identified through a phased investigation using qualified professional consultants and a consistent methodology. The Cultural Resource Assessment Procedures identify and define certain archaeological resource experts that will play key roles in identifying archaeological resources.

When a Phase I investigation (records check, background research, consultation, a field survey) identifies possible archaeological resources on a project site, the project site will be abandoned or a Phase II investigation will proceed. When a Phase II evaluation (limited subsurface testing, inventorying and evaluation) identifies unique archaeological resources a Phase III Data Recovery/Mitigation Program is conducted if the site is still being considered. Once the site's archaeological resources are characterized through the assessment process, LAUSD considers (1) whether the proposed project with implementation of standard conditions would result in potentially significant impacts to unique archaeological resources, and (2) if so, whether ~~project design features (PDFs) or other~~ feasible measures or alternatives would avoid or substantially reduce the impacts. Each project that may impact an archeological resource will include implementation of ~~OEHS CEQA Specification Manual, Appendix H, Historical Resources and PDF LAUSD SC-CUL-10-12 through PDF SC-CUL-45-17~~ for assessment, monitoring, protection and salvage of resources. Impacts would be less than significant.

Impact 5.5-3: The SUP-related projects are not anticipated to destroy paleontological resources or unique geologic features. [Threshold CUL-3]

All projects Involving Grading, Excavation, or Other Ground-Disturbing Activities

Grading, excavation, or other ground-disturbing activities during construction could damage previously undiscovered fossils. Once a project site is identified for acquisition or an existing school site is identified for modification, the LAUSD would conduct a paleontological investigation pursuant to the LAUSD Cultural Resource Assessment Procedures.²⁶ The procedures ensure that unique paleontological resources will be investigated before projects are approved. Under the procedures, the LAUSD's qualified archaeologist will consult with the Los Angeles County Museum of Natural History, Vertebrate Paleontology Department to determine whether paleontological specimens have been found at the site, the likelihood that a site in that area could yield significant specimens, and recommendations for additional studies, as warranted. If LAUSD determines that paleontological resources are not likely to be found in that area, no further studies are required.

If a paleontological investigation identifies the possibility of unique paleontological resources on a proposed project site or a likelihood that such resources are onsite the District considers (1) whether the proposed

²⁶ LAUSD OEHS CEQA Specification Manual, Appendix H, Cultural Resource Assessment Procedures. December 2005, Revised June 2007.

5. Environmental Analysis

CULTURAL RESOURCES

project with implementation of standard conditions would result in potentially significant impacts to those resources, and (2) if so, whether ~~project design features (PDFs) or other~~ feasible measures or alternatives would avoid or substantially reduce the impacts

Each project that may impact unique paleontological resources will implement ~~OEHS CEQA Specification Manual, Appendix H, Historical Resources Policy and PDF LAUSD SC-CUL-17-19 and SCPDF_CUL-18-20~~ for assessment, monitoring, protection and salvage of potential resources. Impacts would be less than significant

Impact 5.5-4: Grading activities are not anticipated to disturb human remains or Tribal Cultural Resources. [Threshold CUL-4]

All Projects Involving Grading, Excavation, or Other Ground-Disturbing Activities

The Los Angeles Basin has been inhabited by the Gabrielino-Tongva Tribe and their ancestors for over 5,000 years. Thus, human remains could be found in grading and/or excavation for construction projects.²⁷ Specific sites for SUP projects have not been identified thus far, and therefore site-specific impacts cannot presently be identified.

CEQA Guidelines Section 15064.5(d) outlines the required process for evaluating, treating, and mitigating impacts based on discovery of human remains. LAUSD would follow the measures specified in the CEQA Guidelines to determine early in the process of project review whether or not there is the potential for human remains.

In the event of accidental discovery of human remains the District and its construction contractors would comply with California Health and Safety Code Section 7050.5 and California Public Resources Code Sections 5097.9 et seq. California Health and Safety Code Section 7050.5 requires that construction activity stop until the coroner has conducted an investigation into the circumstances, manner, and cause of any death, and the recommends treatment and disposition of the human remains. If the coroner determines that the remains are not subject to their authority and if the human remains are Native American, within 24 hours they will contact the Native American Heritage Commission.

Tribal Cultural Resources

The new provisions in the Public Resources Code enumerate topics that may be addressed during consultation, including tribal cultural resources, the potential significance of project impacts, the type of environmental document that should be prepared, possible mitigation measures and project alternatives.²⁸

CEQA Process and Consultation Steps

The new provisions in the Public Resources Code proscribe specific steps and timelines governing the notice and consultation process.²⁹

²⁷ “Construction projects” here means any project involving construction, including new construction, modernization, replacement, upgrade, remodel, renovation, and installation projects that would involve grading, excavation, or other ground-disturbing activities

²⁸ Pub. Resources Code, § 21080.3.2(a)

5. Environmental Analysis CULTURAL RESOURCES

- 1) The Native American Heritage Commission will provide each tribe with a list of all public agencies that may be lead agencies under CEQA within the geographic area with which the tribe is traditionally and culturally affiliated, the contact information of those public agencies, and information on how the Tribe may request consultation. This list must be provided on or before July 1, 2016.³⁰
- 2) If a tribe wishes to be notified of projects within its traditionally and culturally affiliated area, the tribe must submit a written request to the relevant lead agency.³¹
- 3) Within 14 days of determining that a project application is complete, or to undertake a project, the lead agency must provide formal notification, in writing, to the tribes that have requested notification of proposed projects as described in step 2, above. That notice must include a description of the project, its location, and must state that the tribe has 30 days to request consultation.
- 4) If it wishes to engage in consultation on the project, the tribe must respond to the lead agency within 30 days of receipt of the formal notification described in step 3, above. The tribe's response must designate a lead contact person. If the tribe does not designate a lead contact person, or designates multiple people, the lead agency shall defer to the individual listed on the contact list maintained by the Native American Heritage Commission.
- 5) The lead agency must begin the consultation process with the tribes that have requested consultation within 30 days of receiving the request for consultation.
- 6) Consultation concludes when either: 1) the parties agree to measures to mitigate or avoid a significant effect, if a significant effect exists, on a tribal cultural resource, or 2) a party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached.³² Note that consultation can also be ongoing throughout the CEQA process.

Additionally, each project that may impact ~~Native American Tribal Cultural R~~-resources will implement ~~LAUSD SC-OEHS CEQA Specification Manual, Appendix H, Historical Resources Policy and CULPD-F-1, SC-CUL-12, SC-CUL-13, SC-CUL-14 SC-CUL-16, SC-CUL-17, and SC-CUL-18~~ for protection and salvage of resources. Impacts would be less than significant.

5.5.4 Applicable Regulations and Standard Conditions

Federal

- National Historic Preservation Act
- Archaeological Resources Protection Act

²⁹ http://www.opr.ca.gov/docs/DRAFT_AB_52_Technical_Advisory.pdf

³⁰ Pub. Resources Code, § 5097.94 (m)

³¹ Pub. Resources Code, § 21080.3.1(b)

³² Pub. Resources Code, § 21080.3.2 (b)(1) & (2)

5. Environmental Analysis

CULTURAL RESOURCES

- Native American Graves Protection and Repatriation Act
- National Register Federal Program Regulations: Qualifications for and nomination of properties to the NRHP

State

- California Public Resources Code Sections 5079–5079.65: Qualifications for and nomination of properties to the CRHR.
- California Public Resources Code Sections 5097.9–5097.99: Protections for Native American historical and cultural resources and sacred sites.
- California Health and Safety Code Section 7050.5: Procedures in the event of accidental discovery of human remains.

LAUSD Standard Conditions of Approval

- ~~SC-CUL-1 through SC-CUL-20~~ ~~EHS CEQA Specification Manual, Appendix H, Historical Resources Policy. (2004 PEIR Appendix E.2, LAUSD Cultural Resource Assessment Procedures).~~
- ~~Project Design Features: PDF CUL-1, PDF CUL-2, PDF CUL-3, PDF CUL-4, PDF CUL-5, PDF CUL-6, PDF CUL-7, PDF CUL-8, PDF CUL-9, PDF CUL-10, PDF CUL-11, and PDF CUL-12.~~

5.5.5 Level of Significance Before Mitigation

Upon implementation of regulatory requirements and LAUSD Standard Conditions listed above, the following impacts would be less than significant: 5.5-2, 5.5-3, and 5.5-4.

Even with implementation of regulatory requirements and LAUSD Standard Conditions the following impacts would be **potentially significant**:

- Impact 5.5 1: SUP-related project implementation may substantially degrade the significance of historical resources.

5.5.6 Mitigation Measures

Impact 5.5-1

There are no additional measures that would further reduce significant impacts to historic resources.

Impact 5.5-2, 5.5-3, and 5.5-4

No mitigation measures are required.

5. Environmental Analysis CULTURAL RESOURCES

5.5.7 Level of Significance After Mitigation

Impact 5.5-1

Each project that may impact an historic resource will include implementation of ~~SC-CUL-1~~ ~~OEHS CEQA~~ ~~Specification Manual, Appendix H, Historical Resources and~~ ~~PDF-CUL-1~~ through ~~PDF-SC-CUL-9-11~~ to reduce impacts from relocation, conversion, rehabilitation, alteration, damage or demolition of an historical resource. LAUSD Standard Conditions would reduce historic resource impacts to the extent feasible; however, no mechanism for the full mitigation has been established. Therefore, even with the federal, state regulatory compliance, and implementation of LAUSD Standard Conditions, impacts associated with the demolition or damage to a historic resource would remain **significant and unavoidable**.

Impact 5.5-2, 5.5-3, and 5.5-4

Impacts would be less than significant.

5. Environmental Analysis CULTURAL RESOURCES

This page intentionally left blank.

5. Environmental Analysis

5.6 GEOLOGY AND SOILS

This section of the EIR evaluates the potential for implementation of the SUP to impact geological and soil resources in the District. The section ~~regulatory framework (plans and policies from several jurisdictional agencies and LAUSD Standard Conditions) plans and policies from several jurisdictional agencies and LAUSD standard conditions, guidelines, specifications, practices, policies, and project design features (LAUSD Standards)~~, along with the existing seismic hazards, underlying soil characteristics, slope stability, and erosion throughout the SUP area, and possible environmental impacts that may occur as SUP-related site-specific projects are implemented, ~~during future phases of the SUP and site specific projects implemented under the SUP.~~

TERMINOLOGY

Seismic Hazard Zone Maps. Maps issued by the State Geologist under PRC Section 2696 that show zones of required investigation.

Zones of Required Investigation referred to as **Seismic Hazard Zones.** Defined in CCR Section 3722, are areas shown on Seismic Hazard Zone Maps where site investigations are required to determine the need for mitigation of potential liquefaction and/or earthquake-induced landslide ground displacements.

Minimum Statewide Safety Standard. The Seismic Hazards Mapping Act and related regulations establish a statewide minimum public safety standard for mitigation of earthquake hazards. This means that the minimum level of mitigation for a project should reduce the risk of ground failure during an earthquake to a level that does not cause the collapse of buildings for human occupancy, but in most cases, not to a level of no ground failure at all. More stringent requirements are prescribed by the California Building Code (CCR Title 24) for hospitals, public schools, and essential service buildings. For such structures, the requirements of the Seismic Hazards Mapping Act are intended to complement the CCR Title 24 requirements.

Fault. A fault is a fracture along which the blocks of crust on either side have moved relative to one another parallel to the fracture. Faults are classified as active by the California Geological Survey if they show evidence of surface displacement within the last 11,000 years.¹

Energy Release. The energy released by an earthquake is measured as moment magnitude (M_w). The M_w scale is logarithmic; therefore, each one-point increase in magnitude represents a tenfold increase in amplitude of the waves and a 32-fold increase in energy. So, a magnitude 7 earthquake produces 100 times (10 × 10) the ground motion amplitude of a magnitude 5 earthquake.

Ground Motion. Motion at the ground surface during an earthquake is measured as horizontal ground acceleration in g, where g is the acceleration of gravity.

The Modified Mercalli Intensity (MMI) Scale. is a qualitative scale of how earthquakes are felt by people and how they affect buildings. The MMI is a 12-point scale ranging from Intensity I, which is rarely felt by people, to

¹ California Geological Survey (CGS). 2007, August 27. Fault-Rupture Hazards in California: Special Publication 42. <ftp://ftp.consrv.ca.gov/pub/dmg/pubs/sp/Sp42.pdf>.

5. Environmental Analysis

GEOLOGY AND SOILS

Intensity XII, in which damage to structures is total and objects are thrown into the air.² In California, the estimated relationship between peak ground acceleration and MMI intensity is shown in Table 5.6-1.

Table 5.6-1 Estimated Relationship between Peak Ground Acceleration and Intensity

Peak Ground Acceleration, g	MMI	Effects
0.039–0.092	V	Felt by nearly everyone; many awakened. Some dishes, windows broken. Unstable objects overturned. Pendulum clocks may stop.
0.092–0.18	VI	Felt by all, many frightened. Some heavy furniture moved; a few instances of fallen plaster. Damage slight.
0.18–0.34	VII	Damage negligible in buildings of good design and construction; slight to moderate in well-built ordinary structures; considerable damage in poorly built or badly designed structures; some chimneys broken.
0.34–0.65	VIII	Damage slight in specially designed structures; considerable damage in ordinary substantial buildings with partial collapse. Damage great in poorly built structures. Fall of chimneys, factory stacks, columns, monuments, walls. Heavy furniture overturned.
0.65–1.24	IX	Damage considerable in specially designed structures; well-designed frame structures thrown out of plumb. Damage great in substantial buildings, with partial collapse. Buildings shifted off foundations.
>1.24	X+	MMI X: Some well-built wooden structures destroyed; most masonry and frame structures destroyed with foundations. Rails bent. MMI XII: Damage total. Lines of sight and level are distorted. Objects thrown into the air.

Source: Wald, David J., et al. 1999, August. Relationships Between Peak Ground Acceleration, Peak Ground Velocity, and Modified Mercalli Intensity in California. Earthquake Spectra 15 No. 3.
Note: g = acceleration of gravity.

Alquist-Priolo Earthquake Fault Zone. The California Geological Survey designates zones of required investigation along known active faults. Before cities and counties can permit development within Alquist-Priolo Earthquake Fault Zones, geologic investigations are required to show that the sites are not threatened by surface rupture from future earthquakes. Building sites must be set back from identified active faults.

Liquefaction. Liquefaction is a process whereby strong earthquake shaking causes sediment layers that are saturated with groundwater to lose strength and behave as a fluid. This subsurface process can lead to near-surface or surface ground failure that can result in property damage and structural failure. If surface ground failure does occur, it is usually expressed as lateral spreading, flow failures, ground oscillation, and/or general loss of bearing strength. Sand boils (injections of fluidized sediment) can commonly accompany these different types of failure.

In order to determine a region's susceptibility to liquefaction, three major factors must be analyzed:

- The intensity and duration of ground shaking.
- The age and textural characteristic of the alluvial sediments: Generally, the younger, less well compacted sediments tend to have a higher susceptibility to liquefaction. Textural characteristics also play a dominant role in determining liquefaction susceptibility. Sand and silty sands deposited in river channels and

² US Geological Survey (USGS). 2012, July 24. The Modified Mercalli Intensity Scale. <http://earthquake.usgs.gov/learn/topics/mercalli.php>.

5. Environmental Analysis GEOLOGY AND SOILS

floodplains tend to be more susceptible to liquefaction and floodplains tend to be more susceptible to liquefaction than coarser or finer grained alluvial materials.

- The depth to the groundwater. Groundwater saturation of sediments is required in order for earthquake induced liquefaction to occur. In general, groundwater depths shallower than 10 feet to the surface can cause the highest liquefaction susceptibility.

Research and historical data indicate that loose, granular materials at depths of less than 50 feet with silt and clay contents of less than 30 percent saturated by relatively shallow groundwater table are most susceptible to liquefaction.

Earthquake-Induced Landslides. Landslides triggered by earthquakes historically have been a significant cause of earthquake damage. In California, large earthquakes such as the 1971 San Fernando, 1989 Loma Prieta, and 1994 Northridge earthquakes triggered landslides that were responsible for destroying or damaging numerous structures, blocking major transportation corridors, and damaging life-line infrastructure. Areas that are most susceptible to earthquake-induced landslides are steep slopes in poorly cemented or highly fractured rocks; areas underlain by loose, weak soils; and areas on or adjacent to existing landslide deposits.³

Collapsible Soils. Collapsible soils are low-density, silty to very fine-grained, predominantly granular soils containing minute pores and voids. When saturated, these soils undergo a rearrangement of their grains and a loss of cementation, causing substantial, rapid settlement under even relatively light loads. A rise in the groundwater table or an increase in surface water infiltration, combined with the weight of a building or structure, can cause rapid settlement and consequent cracking of foundations and walls. Collapsible soils generally result from rapid deposition close to the source of the sediment where the materials have not been sufficiently moistened to form a compact soil.

Expansive Soils. Expansive soils contain certain types of clay minerals that shrink or swell as the moisture content changes; the shrinking or swelling can shift, crack, or break structures built on such soils. Arid or semiarid areas with seasonal changes of soil moisture experience a much higher frequency of problems from expansive soils than areas with higher rainfall and more constant soil moisture.⁴

Subsidence. Subsidence is the sinking of the land surface. Evidence of subsidence includes ground cracking and damage to roadways, aqueducts, and structures. Subsidence caused by excessive groundwater pumping is a common occurrence in areas of California where groundwater is pumped for agricultural and municipal wells.⁵ Land subsidence also occurs due to oil withdrawal; the best-known example of which is in the

³ California Geological Survey. 2001. Seismic Hazard Zone Report for the Oat Mountain 7.5-Minute Quadrangle, Los Angeles County, California. http://gmw.consrv.ca.gov/shmp/download/quad/OAT_MOUNTAIN/reports/oatm_eval.pdf.

⁴ Colorado Geological Survey (COGS). 2011, April 28. Definition of Swelling Soils. <http://geosurvey.state.co.us/hazards/Swelling%20Soils/Pages/Definition.aspx>.

⁵ Harden, Deborah. 2004. California Geology. Upper Saddle River, NJ: Pearson Education, Inc.

5. Environmental Analysis

GEOLOGY AND SOILS

Wilmington Oil Field in southern Los Angeles County, where land subsidence has reached nine meters (30 feet).⁶

Corrosive Soils. Corrosion of various metals and concrete is a common problem in some soils. Corrosion affects materials both on and below the soil surface. Concrete and uncoated steel are used extensively. Streets, highways, sidewalks, houses, and pipelines for gas, sewage, and water are a few examples of the structures and facilities that are exposed to corrosion.

Groundwater. Groundwater is water underneath the surface of the earth. Rock or soil yielding groundwater to wells or springs in economically usable amounts is termed an aquifer; the upper surface of an aquifer is termed the water table.⁷

Asbestos. Asbestos is the name of a group of silicate minerals that are heat resistant and thus were commonly used as insulation and fire retardant. Inhaling asbestos fibers has been shown to cause lung disease (asbestosis) and lung cancer (mesothelioma).⁸ Outcrops of asbestos minerals can pose health hazards to people nearby.

A **seiche** is a surface wave created when a body of water is shaken, usually by earthquake.

5.6.1 Environmental Setting

5.6.1.1 REGULATORY FRAMEWORK

Regional and local laws, regulations, plans, policies, and guidelines ~~along with LAUSD Standards~~ are summarized below. The following regulatory framework discussion does not include all plans and policies that relate to geology and soils 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 type of project and the location. Specific requirements of these laws, regulations, plans, policies, and guidelines might not be up to date when a proposed site-specific school project undergoes review; therefore, this section provides a general discussion of the most important ones. Some of these are not directly applicable to the SUP or site-specific projects implemented under the SUP; however, they are included to assist in identifying potential impacts and significance thresholds. Applicable LAUSD Standard Conditions of Approval are also listed. See *Applicable Regulations and Standard Conditions* at end of this chapter for those that require District compliance.

⁶ Poland, Joseph F. 1984. Guidebook to studies of land subsidence due to ground-water withdrawal. United Nations Educational, Scientific, and Cultural Organization (UNESCO). <http://www.rcamnl.wr.usgs.gov/rgws/Unesco/PDF-Chapters/Chapter3.pdf>.

⁷ Sharp, John M., Jr. 2007. A Glossary of Hydrogeological Terms. University of Texas, Austin. <http://www.geo.utexas.edu/faculty/jmsharp/sharp-glossary.pdf>.

⁸ Department of Toxic Substances Control (DTSC). 2010, September 13. Glossary of Environmental Terms. http://www.dtsc.ca.gov/InformationResources/Glossary_of_Environmental_Terms.cfm.

5. Environmental Analysis GEOLOGY AND SOILS

Federal

Uniform Building Code Chapter 18, Division 1 Section 1803.2 and 1804.5

The **Uniform Building Code** (UBC) 1994, Chapter 18, Division 1 Section 1803.2 mandates that special foundation design consideration be employed if the soil Expansion Index is 20, or greater in accordance with Table 18-1-B. The methodology and scope for a geotechnical investigation are described in UBC Section 1803, and requires an assessment of a variety of factors, such as slope stability, soil strength, adequacy of load-bearing soils, the presence of compressible or expansive soils, and the potential for liquefaction. The required content of the geotechnical report includes recommendations for foundation type and design criteria. These recommendations can include foundation design provisions that are intended to mitigate the effects of expansive soils, liquefaction, and differential settlement. In general, mitigation can be accomplished through a combination of ground modification techniques (i.e., stone columns, reinforcing nail and anchors, deep soil mixing, etc.), selection of an appropriate foundation type and configuration, and use of appropriate building/foundation structural systems. Section 1804.5 Excavation, Grading, and Fill require the preparation of a geotechnical report where a building will be constructed on compacted fill.⁹

The **International Building Code** (IBC) replaced earlier regional building codes (including the Uniform Building Code) in 2000 and established consistent construction guidelines for the nation. In 2006, the IBC was incorporated into the 2007 California Building Code (CBC), and currently applies to all structures being constructed in California. The national model codes are therefore incorporated by reference into the building codes of local municipalities. The CBC includes building design and construction criteria that take into consideration the State's seismic conditions.

Code of Federal Regulation, Title 10, Section 1022.11

Flood Insurance Rate Maps (FIRMs) are prepared by the Federal Insurance Administration of the Department of Housing and Urban Development after a risk study for a community has been completed and the risk premium rates have been established. The maps indicate the risk premium zones applicable in the community and when those rates are effective. FIRMs are used in making flood plain determinations and determining if a proposed action is in the base or critical action flood plain, as appropriate.

Code of Federal Regulations, Title 40, Parts 122 et seq.

National Pollution Discharge Elimination System (NPDES) regulations are issued by the U.S. Environmental Protection Agency (EPA) for implementation of requirements of the Clean Water Act (US Code, Title 33, Sections 1342 et seq.). All counties with storm drain systems that serve a population of 50,000 or more, as well as construction sites of one acre or more, must file for and obtain an NPDES permit. The State Water Resources Control Board (SWRCB) issues the statewide general NPDES Permit for stormwater discharges from construction sites. Under this Construction General permit, discharges of stormwater from construction sites with a disturbed area of one or more acres are required to either obtain individual NPDES permits or to be covered by the Construction General Permit. Coverage by the Construction General Permit is accomplished by completing and filing a Notice of Intent with the SWRCB

⁹ Uniform Building Code. http://www.ecodes.biz/ecodes_support/updates/Legacy/ICBO/UBC/ICBO_UBC_main.html

5. Environmental Analysis

GEOLOGY AND SOILS

and developing and implementing a Storm Water Pollution Prevention Plan (SWPPP). Each applicant under the Construction General Permit must ensure that a SWPPP is prepared prior to grading and is implemented during construction. The SWPPP must list best management practices (BMPs) to be used on the construction site to protect stormwater runoff, and must contain a visual monitoring program; a chemical monitoring program for “nonvisible” pollutants to be implemented if there is a failure of BMPs; and a monitoring plan if the site discharges directly to a water body listed on the state’s 303(d) list of impaired waters. The NPDES Program is a federal program which has been delegated to the State of California for implementation through the State Water Resources Control Board and the nine Regional Water Quality Control Boards. In California, NPDES permits are also referred to as waste discharge requirements (WDRs) that regulate discharges to waters of the United States. For a more detailed description of the NPDES permitting please refer to Chapter 5.9, Hydrology and Water Quality.

State

California Public Resources Code, Section 2621

The **Alquist-Priolo Earthquake Fault Zoning Act**¹⁰ was signed into state law in 1972, as amended, to mitigate the hazard of fault rupture by prohibiting the location of structures for human occupancy on an active fault. The act requires the state geologist to delineate “Earthquake Fault Zones” along faults that are “sufficiently active” and “well defined.” The act also requires that cities and counties withhold development permits for sites within an Earthquake Fault Zone until geologic investigations demonstrate that the sites are not threatened by surface displacements from future faulting. Pursuant to this act, structures for human occupancy are not allowed within 50 feet of the trace of an active fault. Active earthquake faults are faults where surface rupture has occurred within the last 11,000 years.

California Public Resources Code, Section 2690 et seq.

The **Seismic Hazard Mapping Act** was adopted by the state in 1990 for the purpose of protecting public safety from the effects of (nonsurface fault rupture) earthquake hazards.

The State Department of Conservation, California Geological Survey (CGS)¹¹ prepares and provides local governments with seismic hazard zones maps that identify areas susceptible to amplified shaking, liquefaction, earthquake-induced landslides, and other ground failures. The seismic hazards zones are referred to as “zones of required investigation” because site-specific geological investigations are required for construction projects in these areas. Before a project that is located within a mapped seismic hazard zone can be permitted, a geologic investigation, evaluation, and written report including evaluation of site-specific seismic hazards and recommendations for appropriate measures to minimize such hazards must be prepared by a licensed geologist. In addition, sellers (and their agents) of real property within a mapped Seismic

¹⁰ Under the 1972 Alquist Priolo Act, the zones that were mapped around active fault traces were originally known as “Special Study Zones”. After January 1, 1994, these same mapped zones were then referred to as “Earthquake Fault Zones”. The name of the law was also changed at that time, from the “Alquist Priolo Special Studies Zone Act” to its current name, the “Alquist Priolo Earthquake Fault Zoning Act.”

¹¹ In April 1860 the California Legislature established the *Geological Survey of California* that has evolved during its 150 years of service, and several name changes, into today’s modern *California Geological Survey* (CGS). <http://www.consrv.ca.gov/CGS/Pages/Index.aspx>

5. Environmental Analysis GEOLOGY AND SOILS

Hazard Zone must disclose that the property lies within such a zone at the time of sale. The intent of this act is to protect the public from the effects of strong ground shaking, liquefaction, landslides, ground failure, or other hazards caused by earthquakes.

California Code of Regulations, Title 24, Part 2

Current law states that every local agency enforcing building regulations, such as cities and counties, must adopt the provisions of the **California Building Code (CBC)** within 180 days of its publication. The publication date of the CBC is established by the California Building Standards Commission. The most recent building standard adopted by the legislature and used throughout the state is the 2013 version, often with local, more restrictive amendments that are based on local geographic, topographic, or climatic conditions.¹² These codes provide minimum standards to protect property and public safety by regulating the design and construction of excavations, foundations, building frames, retaining walls, and other building elements to mitigate the effects of seismic shaking and adverse soil conditions. The CBC contains provisions for earthquake safety based on factors including occupancy type, the types of soil and rock onsite, and the strength of ground shaking with specified probability of occurring at a site. The CBC is based largely on the International Building Code (IBC) published by the International Code Council (ICC), an organization of building officials.

Chapter 18 of the CBC, Soils and Foundations, specifies the required level of soil investigation, required by law in California. Requirements in Chapter 18 apply to building and foundations systems and consider reduction of potential seismic hazards.

Section 4-317(e) of the CBC requires geological and soil engineering studies to be made for the construction of any school building, or for the reconstruction or alternation or addition to any school building for work which alters structural elements if the site of the project is within the boundaries of any special studies zone (Alquist-Priolo Zones).

California Code of Regulations, Title 5, Section 14010

Title 5¹³ regulation sets safety standards for selection of new school sites. The section includes prohibitions on construction of public schools on sites containing active faults or fault traces or subject to moderate to high liquefaction or landslides.

California Code of Regulations, Title 5, Section 14011 and 14012

Section 14011, **Procedures for Site Acquisition–State-Funded School**, and Section 14012, **Procedures for Site Acquisition–Locally-Funded School**, requires that, in compliance with Education Code Sections 17212 and 17212.5, the geological and soil engineering study shall address all of the following:

¹² The 2013 CBC took effect on January 1, 2014.

¹³ Title 5. Education, Division 1. California Department of Education, Chapter 13. School Facilities and Equipment, Subchapter 1. School Housing, Article 2. School Sites, 14010. Standards for School Site Selection. <http://government.westlaw.com/linkedslice/default.asp?SP=CCR-1000>.

5. Environmental Analysis

GEOLOGY AND SOILS

- Nature of the site, including a discussion of liquefaction, subsidence or expansive soils, slope, stability, dam or flood inundation, and street flooding.
- Whether the site is located within a special study zone.
- Potential for earthquake or other geological hazard damage.
- Whether the site is situated on or near a pressure ridge, geological fault, or trace fault that may rupture during the life of the school building and the student risk factor.
- Economic feasibility of the construction effort to make the school building safe for occupancy.

California Code of Regulations, Title 14, Division 2, Chapter 8, Article 10

Seismic Hazards Mapping Regulations These regulations govern the exercise of city, county and state agency responsibilities to identify and map seismic hazard zones and to mitigate seismic hazards to protect public health and safety in accordance with the provisions of Public Resources Code, Section 2690 et seq. (Seismic Hazards Mapping Act).¹⁴ Section 3724 “Specific Criteria for Project Approval” states:

The following specific criteria for project approval shall apply within seismic hazard zones and shall be used by affected lead agencies in complying with the provisions of the Act:

- (a)-A project shall be approved only when the nature and severity of the seismic hazards at the site have been evaluated in a geotechnical report and appropriate mitigation measures have been proposed.
- (b)-The geotechnical report shall be prepared by a *registered civil engineer or certified engineering geologist*, having competence in the field of seismic hazard evaluation and mitigation. The geotechnical report shall contain site-specific evaluations of the seismic hazard affecting the project, and shall identify portions of the project site containing seismic hazards. The report shall also identify any known off-site seismic hazards that could adversely affect the site in the event of an earthquake. The contents of the geotechnical report shall include, but shall not be limited to, the following:
 - (1)-Project description.
 - (2)-A description of the geologic and geotechnical conditions at the site, including an appropriate site location map.
 - (3)-Evaluation of site-specific seismic hazards based on geological and geotechnical conditions, in accordance with current standards of practice.

¹⁴ State Department of Conservation, California Geological Survey. CGS Codes. California Code of Regulations, Title 14, Division 2, Chapter 8, Article 10. <http://www.consrv.ca.gov/cgs/codes/ccr/t14/Pages/3720.aspx>

5. Environmental Analysis GEOLOGY AND SOILS

(4)_Recommendations for appropriate mitigation measures as required in Section 3724(a), above.

(5)_Name of report preparer(s), and signature(s) of a certified engineering geologist and/or registered civil engineer, having competence in the field of seismic hazard evaluation and mitigation.

(c)_Prior to approving the project, the lead agency shall independently review the geotechnical report to determine the adequacy of the hazard evaluation and proposed mitigation measures and to determine the requirements of Section 3724(a), above, are satisfied. Such reviews shall be conducted by a certified engineering geologist or registered civil engineer, having competence in the field of seismic hazard evaluation and mitigation.

The Act (PRC, Section 2621) and Regulations (CCR, Title 14, Division 2, Chapter 8, Article 10) state that the site investigation reports must be prepared by a certified engineering geologist or registered civil engineer, who must have competence in the field of seismic hazard evaluation and mitigation, and be reviewed by a certified engineering geologist or registered civil engineer, also competent in the field of seismic hazard evaluation and mitigation.

Although the Seismic Hazards Mapping Act does not distinguish between the types of licensed professionals who may prepare and review the report, the current Business and Professions Code (Geologist and Geophysicist Act, Section 7832; and Professional Engineers Act, Section 6704) restricts the practice of these two professions. Because of the differing expertise and abilities of engineering geologists and civil engineers, the scope of the site investigation report for the project may require that both types of professionals prepare and review the report, each practicing in the area of their expertise. Involvement of both engineering geologists and civil engineers will generally provide greater assurance that the hazards are properly identified, assessed, and mitigated.

The State Mining and Geology Board recommends that engineering geologists and civil engineers conduct the assessment of the surface and subsurface geological/geotechnical conditions at the site, including off-site conditions, to identify potential hazards to the project. It is appropriate for the civil engineer to design and recommend mitigation measures. It also is appropriate for both engineering geologists and civil engineers to be involved in the implementation of the mitigation measures; engineering geologists to confirm the geological conditions and civil engineers to oversee the implementation of the approved mitigation measures.¹⁵

California Geological Survey Special Publication 117

California Geological Survey (CGS) Special Publication 117 “**Guidelines for Evaluating and Mitigating Seismic Hazards in California,**” provides criteria for the evaluation and mitigation of earthquake-related hazards for projects within designated zones of required investigations. Special Publication 117 has two objectives: 1) To assist in the evaluation and mitigation of earthquake-related hazards for projects within

¹⁵ California Geological Survey (CGS). 2008, September 11. Guidelines for Evaluating and Mitigating Seismic Hazards in California (California Geological Survey Special Publication 117). <http://www.conservation.ca.gov/cgs/shzp/webdocs/Documents/sp117.pdf>.

5. Environmental Analysis

GEOLOGY AND SOILS

designated zones of required investigations; and, 2) To promote uniform and effective statewide implementation of the evaluation and mitigation elements of the Seismic Hazards Mapping Act.¹⁶ The document includes: recommended content for site investigation reports within zones of required investigations; earthquake ground-motion parameters; analysis of earthquake-induced landslide hazards; analysis of liquefaction hazards; guidelines for mitigating seismic hazards; guidelines for reviewing site-investigation reports.

According to Special Publication 117, the investigation of potential seismic hazards can be performed in two steps: 1) a preliminary screening investigation, and 2) a quantitative evaluation of the seismic hazard potential and its consequences. The investigation can be completed by skipping stage 1 or 2. For example, a preliminary screening investigation may find that a previous site-specific investigation, on or adjacent to the project site, has shown that no seismic hazards exist, and that a quantitative evaluation is not necessary. Conversely, a consultant or project manager may know from experience that a project site is susceptible to a given hazard, and may opt to forego the preliminary screening investigation and start with a quantitative evaluation of the hazard.

California Geological Survey Note 48

CGS Note 48 is also known as the “**Checklist for the Review of Engineering Geology and Seismology Reports for California Public Schools, Hospitals, and Essential Services Buildings.**”¹⁷ Note 48 is used by the CGS to review the geology, seismology, and geologic hazards evaluated in reports that are prepared under CCR Title 24 (California Building Code). CCR Title 24 applies to California Public Schools, Hospitals, Skilled Nursing Facilities, and Essential Services Buildings. The Building Official for public schools is the Division of the State Architect (DSA). Hospitals and Skilled Nursing Facilities in California are under the jurisdiction of the Office of Statewide Health Planning & Development (OSHDP). The CGS serves as an advisor under contract with these two state agencies. The Checklist includes items listed under: project location; engineering geology/site characterization; seismology and calculation of earthquake ground motion; liquefaction/seismic settlement analysis; slope stability analysis; other geologic hazards or adverse conditions, and; report documentation.

California Government Code, Section 8875.8

In California, unreinforced masonry buildings are generally brick buildings constructed prior to 1933 and predating modern earthquake-resistant design. In earthquakes, the brick walls (especially parapets) tend to disconnect from the building and fall outward, creating a hazard for people below and sometimes causing the building to collapse. The **Unreinforced Masonry Law**, enacted in 1986, requires cities and counties in Seismic Zone 4 to identify hazardous unreinforced masonry buildings and to consider local regulations to abate potentially dangerous buildings through retrofitting or demolition, as outlined in the State Office of Planning and Research Guidelines.

¹⁶ California Geological Survey (CGS). 2008, September 11. Guidelines for Evaluating and Mitigating Seismic Hazards in California (California Geological Survey Special Publication 117). <http://www.conservation.ca.gov/cgs/shzp/webdocs/Documents/sp117.pdf>.

¹⁷ California Geological Survey (CGS). 2007, November 7. Note 48: Checklist for the Review of Engineering Geology and Seismology Reports for California Public Schools, Hospitals, and Essential Services Buildings. http://www.conservation.ca.gov/cgs/information/publications/cgs_notes/note_48/note_48.pdf.

5. Environmental Analysis GEOLOGY AND SOILS

California Education Code, Section 17281

Section 17281, together with Article 6 (commencing with Section 17365) and Article 7 (commencing with Section 81130) of Chapter 1 of Part 49, is known as the Field Act. The Field Act was one of the first legislative acts to mandate earthquake-resistant construction (specifically for schools in California) in the United States. The Field Act was passed because of the 6.4 magnitude 1933 Long Beach earthquake, which destroyed or rendered unsafe 230 school buildings. Many school buildings completely collapsed due to unreinforced masonry construction and/or shoddy workmanship. Governor James Rolph, Jr. and the Legislature responded quickly by enacting the Field Act (named after Assembly Member Don C. Field, its key sponsor), which required earthquake-resistant design and construction of all public schools. It was enacted on April 10, 1933, exactly 30 days after the earthquake. It has since governed the planning, design, and construction of billions of dollars of public school (K-14) building investments.

The act also established the Office of the State Architect (now Division of the State Architect [DSA]), which developed design standards and quality control procedures, and required that schools be designed by registered architects and engineers. Charter school may, but are not required to, use Field Act compliant facilities.¹⁸

The Field Act is built on four major principles:¹⁹

- Seismic design standards
- Plan review
- Construction inspections
- Special tests

More specifically, the Field Act requires:

- The DSA must write design standards for public schools.
- Public school building construction plans must be prepared by qualified California-licensed structural engineers and architects.
- Designs and plans must be checked by DSA for compliance with the Field Act before contracts for construction can be awarded.
- Qualified inspectors, independent of the architecture and engineering contractors and hired directly by the school districts, must continuously inspect construction and verify compliance with the approved plans.

¹⁸ CDE. Charter Schools FAQ Section 10. <http://www.cde.ca.gov/sp/cs/re/csfaqsect10.asp>.

¹⁹ State of California. Alfred E. Alquist, Seismic Safety Commission. *The Field Act and Public School Construction: A 2007 Perspective*. February 2007. http://www.seismic.ca.gov/pub/CSSC_2007-03_Field_Act_Report.pdf

5. Environmental Analysis

GEOLOGY AND SOILS

- Responsible architects and/or structural engineers must observe the construction periodically. Changes to plans (if necessary) must be prepared by the responsible architects and/or structural engineers and are subject to approval by DSA.
- Special tests, if needed, must be ordered by DSA and performed by certified testing laboratories.
- Architects, engineers, inspectors, and contractors must file reports, under penalty of perjury, that verify that actual construction complies with approved plans.

In 1939 the **Garrison Act** applied Field Act standards to existing school buildings. The first real-world test of the Field Act took place in the 1940 Imperial Valley earthquake. This earthquake was magnitude 7.1, but the 16 post-Field Act school buildings subjected to intense shaking suffered damage that was less than 1 percent of their valuation. Older, pre-Field Act structures suffered damaged equal to 29 percent of their valuation.

Although the benefits of the Field Act were demonstrated during the 1940 earthquake, many districts still delayed inspecting or renovating older pre-Field Act structures. As a result, the first and second **Green Acts** were passed in 1967 and 1968, respectively, to set inspection deadlines for school districts. The 1971 San Fernando earthquake spurred the State Legislature to provide additional funding to retrofit older buildings.

California Education Code, Section 17212

This law requires that a geological and soil engineering study be prepared if a prospective school site is within the boundaries of any special studies zone or within an area designated as geologically hazardous in the safety element of the local general plan. Geologic and soil engineering studies provide an assessment of the nature of the site and the potential for earthquake or other geological hazard damage. The geologic and soil engineering studies are used to preclude the siting of a school in a location that would be too expensive to mitigate potential seismic hazards.

California Education Code, Section 17212.5

This law requires preparation of geological and soil engineering studies, as described in Section 17212, for the construction of any school building, or for the reconstruction, alteration, or addition to any school building that alters structural elements, if the estimated cost exceeds \$20,000. No school building shall be constructed, reconstructed, or relocated on the trace of a geologic fault along which surface rupture can reasonably be expected to occur within the life of the school building.

California Department of Education

School Site Selection and Approval Guide. Appendix H: Factors to Be Included in a Geological and Environmental Hazards Report

Beginning in the early 1970s, a series of bans on the use of certain asbestos-containing materials (ACMs) in construction were established by the EPA and the Consumer Product Safety Commission. Most US manufacturers voluntarily discontinued the use of asbestos in certain building products during the 1980s.

5. Environmental Analysis GEOLOGY AND SOILS

Division of the State Architect, Regulatory Document IR A-4

Regulatory Document IR A-4, “Geological Hazard Studies for Schools,” requires that no school building be constructed, reconstructed, or relocated in the trace or within 50 feet either side of a geological fault along which surface rupture can reasonably be expected to occur within the expected life of the school building. Document IR A-4 provides procedures for implementing California Education Code Section 17212.5 and California Building Code Sections 1613A and 1803A.²⁰

LAUSD

Standard Conditions of Approval

LAUSD Standards

This table lists the geology and soils related standard condition that ~~is~~ will be included as part of each SUP-related project, as appropriate.

STANDARD CONDITIONS				
Reference #	Topic	Trigger for Compliance	Implementation Phase	Standard Conditions
SC-GEO-010 Compliance	Seismic Hazards	For all projects that require that involve grading, excavation, or other ground-disturbing activities	During project design, and project construction	OEHS CEQA Specification Manual, Appendix G Supplemental Geohazard Assessment Scope of Work. This document outlines the procedures and scope for LASUD geohazard assessments.

The LAUSD OEHS CEQA Specification Manual, Appendix G Supplemental Geohazard Assessment Scope of Work, March 2, 2006, outlines the procedures and scope for LASUD geohazard assessments as amended for the SUP. Implementation of the geohazard assessment would include the following.

Purpose And Qualifications

For SUP-related project sites where preliminary geotechnical or environmental assessments have identified the potential for risks related to seismic or other geohazards, a supplemental geohazard assessment is required. In order to ensure the proposed site is safe for its intended use, the following scope of work shall be implemented by qualified professionals. Recommended qualifications include:

²⁰ Division of the State Architect . 2013, December 19. IR A-4: Geohazard Report Requirements. http://www.documents.dgs.ca.gov/dsa/pubs/IR_A-4_rev12-19-13.pdf.

5. Environmental Analysis

GEOLOGY AND SOILS

- Staff directing work is a registered California professional (PE, PG, CEG, etc.)
- Recognized experience in geotechnical engineering, geophysics and seismology in Southern California
- Expertise in identifying and dating recent and paleo-seismic events,
- Expertise in soil horizon development identification and dating of recent age seismic events, and
- Recent publications related to the field of expertise (geophysics, seismology, paleoseismic events, soil horizon development, and dating of recent age seismic events).

Task 1.0 – Conduct Seismic Database Review

To supplement existing geotechnical or geological information, a review of existing seismic databases and scientific literature will be conducted. The objective of the database review is to refine, to the extent possible, the location of the potential fault or other geohazards identified near the site during the preliminary review. Review of materials will include, but are not limited to, data provided by the United States Geological Survey (USGS), the California Geological Survey, the California Department of Oil, Gas, and Geothermal Resources (DOGGR), the Southern California Earthquake Center (SCEC), the City and/or County of Los Angeles, recent articles in academic journals, other professional geohazard investigations performed in the site vicinity, and seismic databases and models, such as Georef (<http://www.americangeosciences.org/georef/georef-information-services>).

Task 2.0 – Prepare Draft Report of Findings and Recommendations

Based on the preliminary geotechnical information and the results of the supplemental geohazard assessment, a draft report of combined findings and recommendations will be prepared for review by the LAUSD. The purpose of the report will be to clarify the location of the identified potential geohazards in relation to the proposed site and to characterize potential seismic hazards, if any, that could reasonably be expected to affect the site. The report shall also identify, to the extent possible, any other potential geohazards that may be present on or adjacent to the site, such as low angle or blind-thrust faults. The report shall include maps showing the locations of all identified potential hazards in relation to the site and recommendations for subsequent investigations, if any.

Task 3.0 – Finalize Report

Based on comments received from the LAUSD, the report will be finalized.

5.6.1.2 EXISTING CONDITIONS

Regional Setting

California is divided into 11 geomorphic provinces, that is, regions defined by characteristic landforms. The District spans parts of two geomorphic provinces: the Transverse Ranges Geomorphic Province, an east-west-trending series of steep mountain ranges and valleys, and the Peninsular Ranges Geomorphic Province, a series of northwest-trending mountain ranges and valleys.

5. Environmental Analysis GEOLOGY AND SOILS

District Setting

Geologic Setting

~~The Northwest and Northeast Local Districts Educational Service Center (ESC) area~~ are within the Transverse Ranges Geomorphic Province, and consists of the San Fernando and Verdugo valleys and mountain ranges and hills surrounding the two valleys—counterclockwise from the northeast: the San Gabriel Mountains and Verdugo Mountains, Santa Susana Mountains, Simi Hills; and northern portions of the Santa Monica Mountains and Hollywood Hills.

The West ~~ESC Local District~~ area includes most of the portions of the Santa Monica Mountains and Hollywood Hills in the Transverse Ranges Geomorphic Province – that are within the District. The balance of the West Local District ~~area~~ is part of the western Los Angeles Basin in the Peninsular Ranges Geomorphic Province.

The Central Local District includes part of the central Los Angeles Basin and the San Rafael Hills, both in the Peninsular Ranges Geomorphic Province.

The East Local District includes part of the central Los Angeles Basin and the Repetto Hills, both in the Peninsular Ranges Geomorphic Province.

~~The East ESC area includes part of the central Los Angeles Basin, and the San Rafael Hills and Repetto Hills, all in the Peninsular Ranges Geomorphic Province.~~

The South ~~ESC area~~ Local District spans part of the southern Los Angeles Basin and part of the Palos Verdes Hills, both in the Peninsular Ranges Geomorphic Province.

Sedimentary rocks underlie most of the District, ranging in age from Mesozoic in the Santa Susana Mountains, the northern parts of the Santa Monica Mountains and Hollywood Hills, the San Rafael Hills and Repetto Hills, and the Palos Verdes Hills, to Quaternary across most of the Los Angeles Basin and San Fernando Valley.^{21,22}

The San Gabriel Mountains consist mostly of granitic igneous rocks, ranging from Mesozoic to Precambrian in age; Mesozoic-age granitic rocks also underlie parts of the Hollywood Hills. Some volcanic rocks of Tertiary age are present in the Santa Monica Mountains.²³

²¹ Geologic time scale: Quaternary, present to 1.8 million years before present (mybp); Tertiary, 1.8 to 65.5 mybp; Mesozoic, 65.5 to 251 mybp; Precambrian, 570+ mybp.

²² The Repetto Hills are in the Community of East Los Angeles in unincorporated Los Angeles County, and in the City of Monterey Park.

²³ California Geological Survey. 2013, May 29. 2010 Geologic Map of California. <http://www.quake.ca.gov/gmaps/GMC/stategeologicmap.html>.

5. Environmental Analysis

GEOLOGY AND SOILS

Geologic Asbestos

Asbestos is the name of a group of silicate minerals that are heat resistant and were commonly used as insulation and fire retardant. Outcrops of asbestos minerals can pose health hazards to people nearby. The California Geological Survey has identified a former asbestos mine near the north District boundary.²⁴

Collapsible Soils

Collapsible soils are present in many alluvial areas of Los Angeles County, including the Santa Clarita Valley.²⁵

Expansive Soils

The District is in a semiarid region with marked seasonal changes in precipitation—most rain falls in winter, and there is a long dry season in summer and autumn. Therefore, the District is in a climate such that a relatively high incidence of soil expansion is expected where soils contain the requisite clay minerals.

Ground Subsidence

Significant ground subsidence occurred in the Beverly Hills/Cheviot Hills, Santa Fe Springs, Wilmington, and Inglewood oil fields in the 1950s and 1960s. Subsidence in those four oil fields was slowed greatly in the 1960s by pumping large amounts of water or steam into oil reservoir rock.²⁶ The City of Los Angeles requires monitoring and mitigation measures to prevent significant subsidence related to oil and gas extraction and mining activities, under its Surface Mining District ordinance.²⁷ There are oil fields in many parts of the District—the communities of Harbor City and Wilmington in the City of Los Angeles and the Cities of Lomita and Carson, on the south; the Community of Marina Del Rey in the City of Los Angeles on the west; the City of West Hollywood and the Community of Hollywood in the City of Los Angeles in the central part of the District; and the Santa Susana Mountains along the District's north boundary.²⁸ Total oil production in Los Angeles County in 2012 was approximately 24 million barrels (1 barrel = 42 US gallons).²⁹

Subsidence caused by groundwater withdrawal is documented in many areas of the southwestern United States, including the Santa Clara, Temecula, and San Jacinto Valleys in California.³⁰ Permanent ground subsidence to a depth of over six feet has occurred in the Antelope Valley in northern Los Angeles County. The most damaging effects of subsidence have been ground fissures in areas of differential ground subsidence.³¹

²⁴ California Geological Survey (CGS) and US Geological Survey (USGS). 2011. Reported Historic Asbestos Mines, Historic Asbestos Prospects, and Other Natural Occurrences of Asbestos in California. ftp://ftp.consrv.ca.gov/pub/dmg/pubs/ms/59/MS59_Plate.pdf.

²⁵ Department of Regional Planning, County of Los Angeles. 1990. Technical Appendix to the Safety Element of the Los Angeles County General Plan. http://planning.lacounty.gov/assets/upl/project/gp_web80-tech-safety.pdf.

²⁶ Department of Regional Planning, County of Los Angeles. 1990. Op Cit.

²⁷ Section 13.03, City of Los Angeles Municipal Code.

²⁸ Division of Oil, Gas, and Geothermal Resources (DOGGR). 2014, January 29. DOGGR Online Mapping System (DOMS). <http://maps.conservation.ca.gov/doms/doms-app.html>.

²⁹ DOGGR. 2013, September 20. Well Counts and Production of Oil, Gas, and Water by County – 2012. <http://www.conservation.ca.gov/dog/Documents/2012%20Oil%20and%20Gas%20Production%20by%20County.pdf>.

³⁰ Department of Regional Planning, County of Los Angeles. 1990. Technical Appendix to the Safety Element of the Los Angeles County General Plan. http://planning.lacounty.gov/assets/upl/project/gp_web80-tech-safety.pdf.

³¹ Los Angeles County Waterworks Districts. 2013, March 14. Antelope Valley Groundwater Restoration and Subsidence Mitigation Project. <ftp://dpwftp.co.la.ca.us/pub/PDD/Wash%20DC%20Docs/4%20-%20Fact%20Sheets%20&%20Correspondence/>

5. Environmental Analysis GEOLOGY AND SOILS

Faulting and Seismicity

Faults in the District are listed below and shown on Figure 5.6-1, *Fault Map*.^{32, 33} Faults identified with (AP) are designated as Alquist-Priolo Earthquake Fault Zones.

Active Faults

- Simi Fault Zone
- Santa Susana Fault (AP)
- San Gabriel Fault
- San Fernando Fault (AP)
- Verdugo Fault
- Sierra Madre Fault (AP)
- Raymond Fault (AP)
- Santa Monica Fault
- Hollywood Fault
- Newport-Inglewood Fault Zone (AP)
- Avalon-Compton Fault (AP)
- Cherry-Hill Fault (AP)
- Palos Verdes Hills Fault
- Cabrillo Fault

Other Faults³⁴

- Vasquez Creek Fault
- Northridge Hills Fault
- Eagle Rock Fault
- De Mille Fault
- Chatsworth Fault
- Charnock Fault

Historical Earthquakes

Historical earthquakes within District boundary and within a radius of 25 miles of the District boundary that were magnitude 5 or larger between 1853 to the present are listed in Table 5.6-2.³⁵

Funding%20Priorities/Antelope%20Valley%20Groundwater%20Restoration%20and%20Subsidence%20Mitigation%20Project%20%28Fact%20Sheet%29.pdf.

³² California Geological Survey (CGS). 2013. Geographical Information System (GIS) data layer.

³³ U.S. Geological Survey (USGS). 2013. Geographical Information System (GIS) data layer.

³⁴ These faults are not identified by USGS as active

³⁵ 1853 was chosen as the beginning of the chronology because the Los Angeles City School District, a predecessor to the LAUSD, was founded that year.

5. Environmental Analysis

GEOLOGY AND SOILS

Table 5.6-2 Selected Historic Earthquakes

Earthquake	Year	Magnitude	Fault	Notes
Long Beach	1933	6.4	Newport-Inglewood	120 deaths, over \$50 million damage
San Fernando	1971	6.6	San Fernando	65 deaths, over \$500 million damage.
Point Mugu	1973	5.3	Fault system along southern edge of Transverse Ranges	-
Whittier Narrows	1987	5.9	thrust fault	8 deaths, \$358 million damage
Pasadena	1988	5.0	Raymond	-
Upland	1990	5.4	San Jose	-
Sierra Madre	1991	5.8	Clamshell – Sawpit Canyon	About \$40 million damage; unreinforced masonry buildings hardest hit.
Northridge	1994	6.7	Northridge Thrust	61 deaths, damage over \$40 billion
Chino Hills	2008	5.4	Puente Hills Thrust	-

Source: Southern California Earthquake Data Center 2013, May 14. Chronological Earthquake Index. <http://www.data.scec.org/significant/chron-index.html>.

Many unreinforced masonry buildings, including numerous schools, were destroyed by the Long Beach Earthquake of 1933. The earthquake happened at 5:54 PM on Friday, March 10 when schoolchildren were not at school. The Field Act, requiring earthquake-resistant design and construction of public schools, was passed in 1933 in response to the Long Beach Earthquake.³⁶

The 1994 Northridge Earthquake occurred on a blind thrust fault and produced the strongest ground motions ever instrumentally recorded in an urban setting in North America.³⁷ Damage was widespread: sections of major freeways collapsed, parking structures and office buildings collapsed, and numerous apartment buildings suffered irreparable damage. Damage to wood-frame apartment houses was very widespread in the San Fernando Valley and Santa Monica areas, especially to structures with “soft” first floor or lower-level parking garages. The high accelerations, both vertical and horizontal, lifted structures off of their foundations and/or shifted walls laterally.³⁸

Surface Rupture

Extensive surface fault ruptures resulting from the San Fernando Earthquake of 1971 damaged numerous homes, commercial buildings, and other structures. Surface rupture is the most easily avoided seismic hazard. Alquist-Priolo Earthquake Fault Zones are mapped along the following five active faults in the District: Newport-Inglewood Fault Zone; Raymond Fault; Sierra Madre Fault; San Fernando Fault; and Santa Susana Fault (see Figure 5.6-1).³⁹ A Preliminary Review Alquist-Priolo Earthquake Fault Zone map was issued by CGS on January 8, 2014, for the Hollywood quadrangle, which spans parts of the central Los Angeles area extending from downtown Los Angeles on the east to the City of West Hollywood and the Baldwin Hills on

³⁶ Southern California Earthquake Data Center. 2013, September 12. Long Beach Earthquake. <http://www.data.scec.org/significant/longbeach1933.html>.

³⁷ A thrust fault is one on which one block of earth is thrust over a second block at a fault plane at a small angle to the horizontal; blind thrust faults show no expression at the ground surface.

³⁸ California Department of Conservation (CDC). 2014, January 28. Northridge Earthquake 10 year Anniversary. http://www.consrv.ca.gov/cgs/geologic_hazards/earthquakes/Pages/northridge.aspx.

³⁹ California Geological Survey (CGS). 2014, January 28. Regulatory Maps. <http://www.quake.ca.gov/gmaps/WH/regulatorymaps.htm>.

5. Environmental Analysis GEOLOGY AND SOILS

the west. The Hollywood quadrangle map shows a proposed Alquist-Priolo Earthquake Fault Zone along the Hollywood Fault extending from the City of West Hollywood at the west quadrangle boundary to the Community of Atwater Village in the City of Los Angeles at the east quadrangle boundary. The new official Alquist-Priolo Earthquake Fault Zone map for the Hollywood quadrangle is anticipated to be published in summer of 2014.⁴⁰

Liquefaction

Much of the District is in zones of required investigation for liquefaction designated by the CGS, including parts of the San Fernando Valley and much of the portion of the Los Angeles Basin in the District (see Figure 5.6-2, *Liquefaction Zones*).⁴¹

Earthquake-Induced Landslides

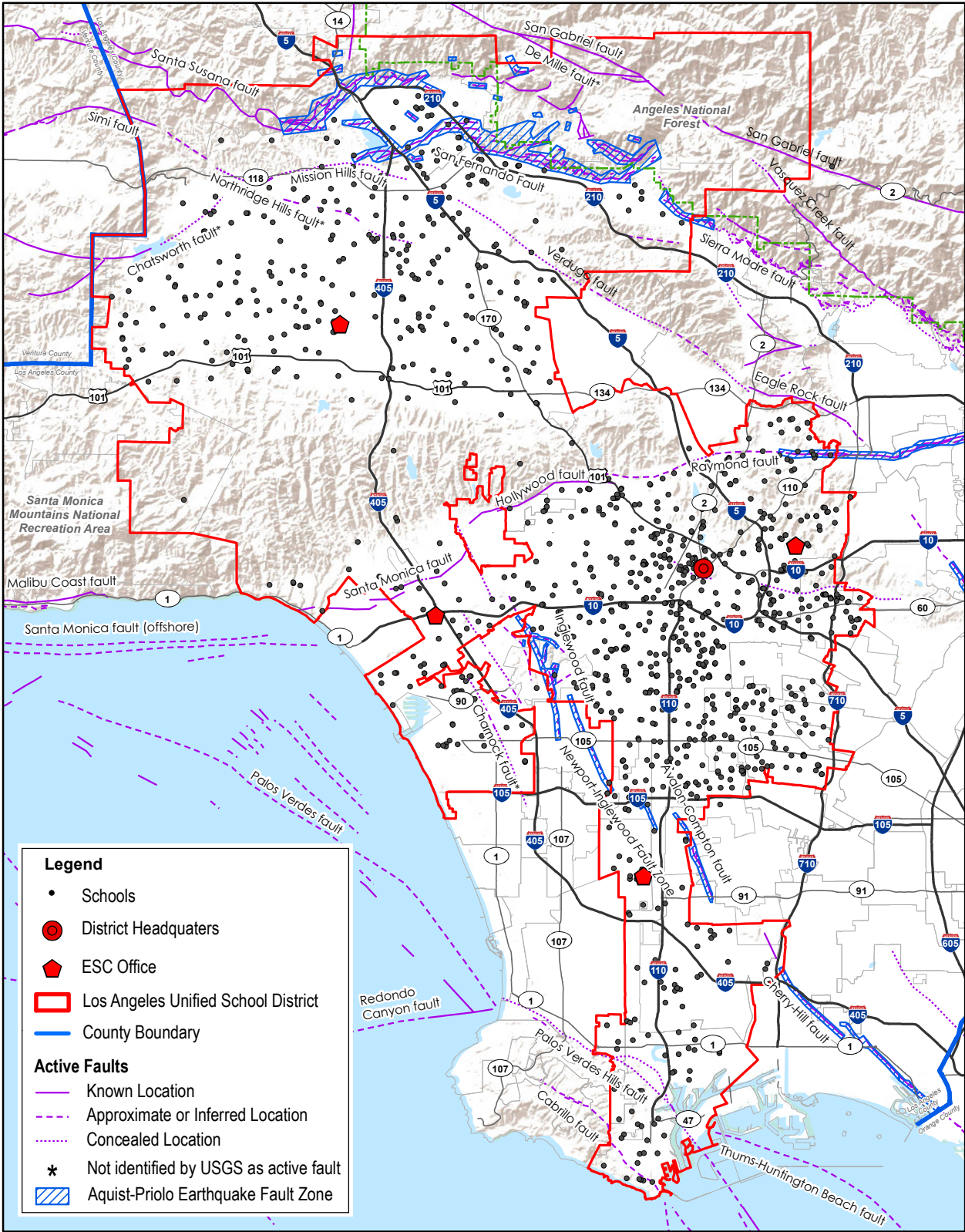
~~Zones of required investigation for earthquake-induced landslides in the District are concentrated in mountainous and hilly regions: the Santa Susana and San Gabriel Mountains; Verdugo Mountains; Santa Monica Mountains and Hollywood Hills, and Palos Verdes Hills (see Figure 5.6-3, *Landslides Zones*).⁴²~~

⁴⁰ California Geological Survey (CGS). 2014, January 8. Preliminary Review Map: Earthquake Zones of Required Investigation, Hollywood Quadrangle. http://www.consrv.ca.gov/cgs/rghm/ap/Documents/Hollywood_EZRIM.pdf.

⁴¹ California Geological Survey. 2013. GIS Layer. Zones of Required Investigation for Liquefaction.

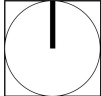
⁴² ~~California Geological Survey. 2013. GIS Layer. Zones of Required Investigation for Earthquake-Induced Landslides.~~

5. Environmental Analysis Figure 5.6-1 Fault Map



Source: California Geological Survey, 2005

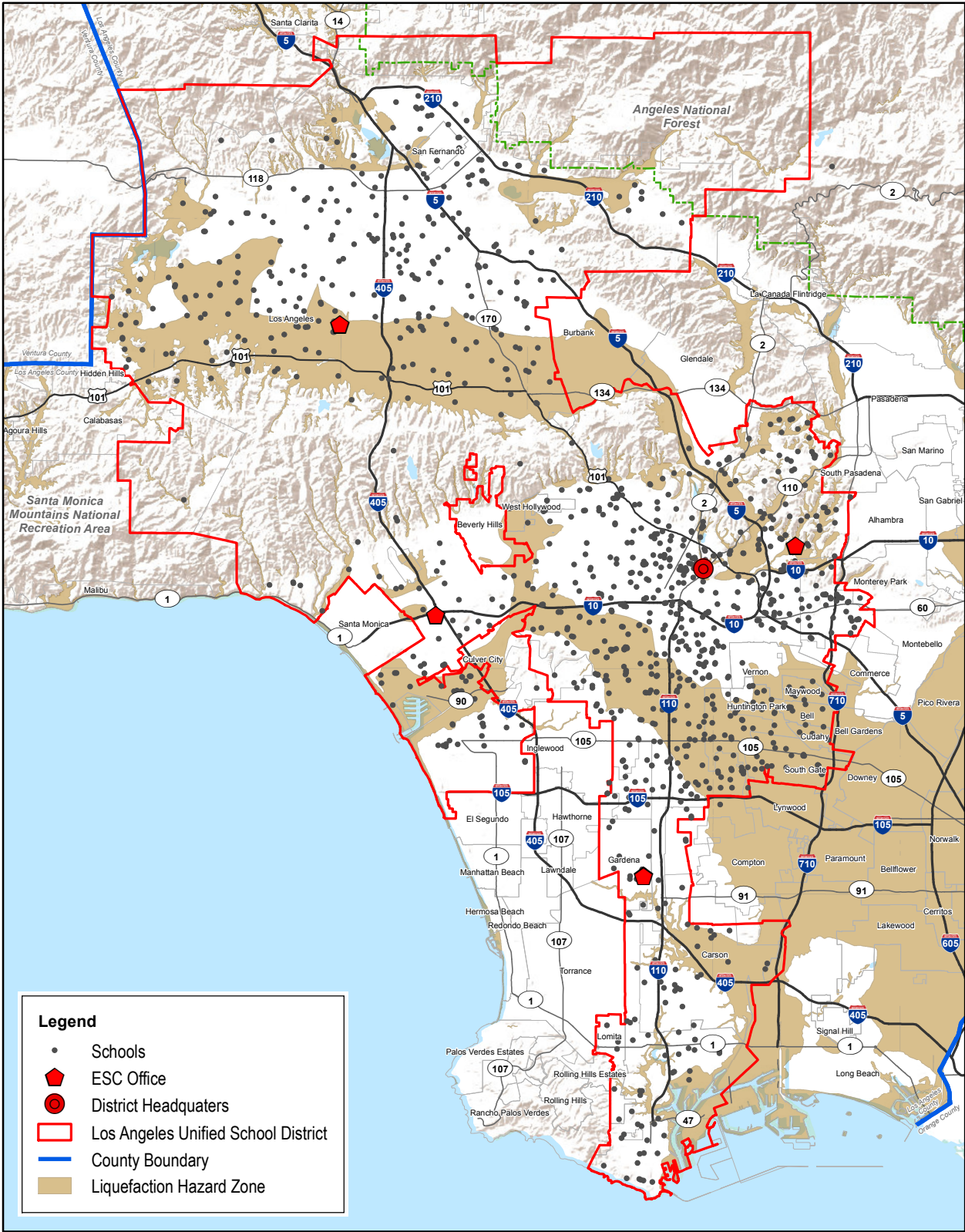
0 6 Miles



5. Environmental Analysis GEOLOGY AND SOILS

This page intentionally left blank.

5. Environmental Analysis Figure 5.6-2 - Liquefaction Zones

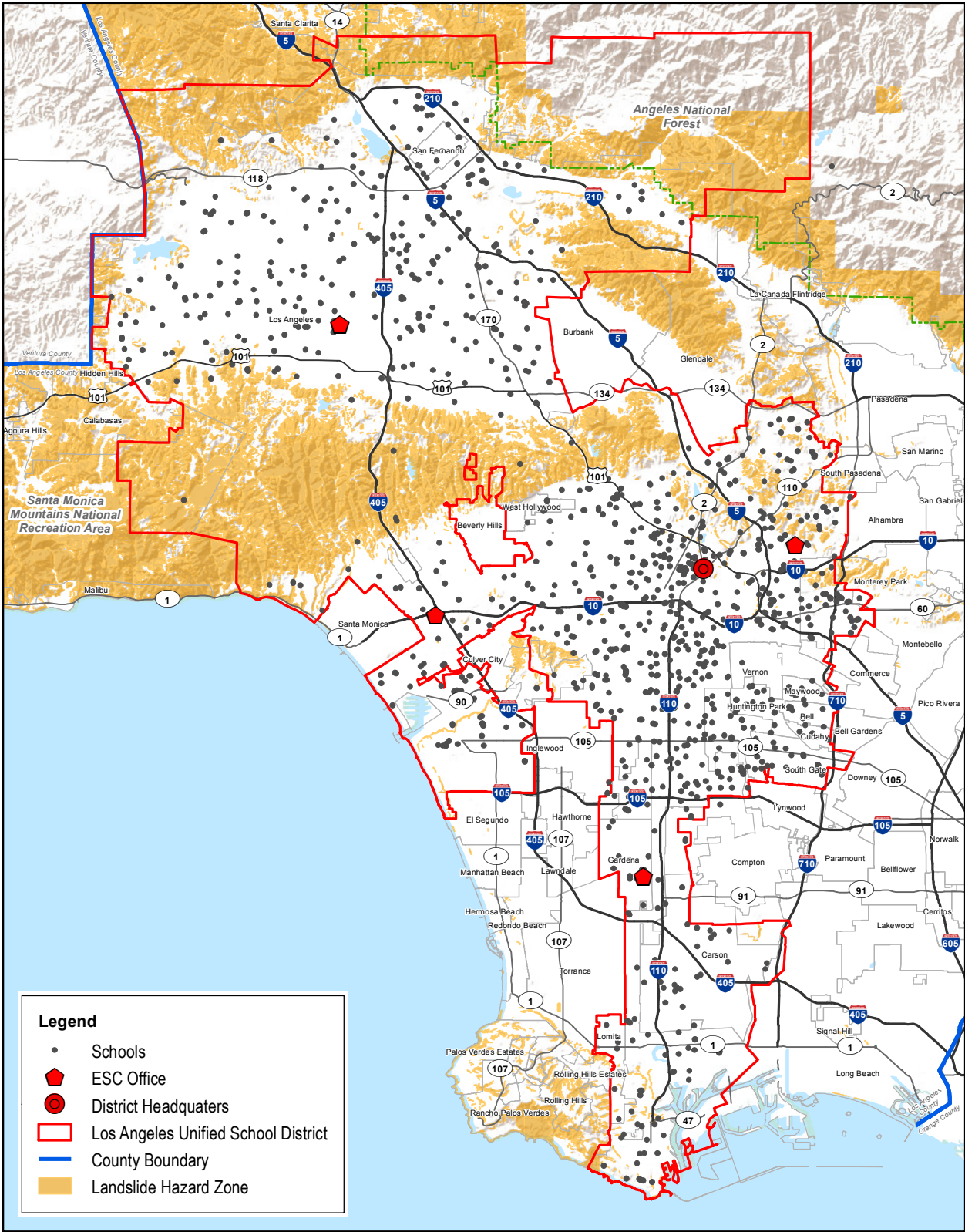


Source: LA County DRP, 2013; California Geological Survey, 2007

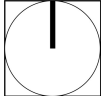
5. Environmental Analysis GEOLOGY AND SOILS

This page intentionally left blank.

5. Environmental Analysis Figure 5.6-3 - Landslide Zones



Source: LA County DRP, 2013; California Geological Survey, 2007



5. Environmental Analysis GEOLOGY AND SOILS

This page intentionally left blank.

5. Environmental Analysis

GEOLOGY AND SOILS

Earthquake-Induced Landslides

~~Zones of required investigation for earthquake-induced landslides in the District are concentrated in mountainous and hilly regions: the Santa Susana and San Gabriel Mountains; Verdugo Mountains; Santa Monica Mountains and Hollywood Hills, and Palos Verdes Hills (see Figure 5.6-3, *Landslides Zones*).⁴³~~

5.6.2 Thresholds of Significance

According to CEQA Guidelines Appendix G a project would normally have a significant effect on the environment if the project would:

- GEO-1 Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:
- i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault. (Refer to Division of Mines and Geology Special Publication 42.)
 - ii) Strong seismic ground shaking.
 - iii) Seismic-related ground failure, including liquefaction.
 - iv) Landslides.
- GEO-2 Result in substantial soil erosion or the loss of topsoil.
- GEO-3 Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse.
- GEO-4 Be located on expansive soil, as defined in Table 18-1B of the Uniform building Code (1994), creating substantial risks to life or property.
- GEO-5 Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water.

5.6.3 Environmental Impacts

The applicable thresholds are identified in brackets after the impact statement.

Impact 5.6-1: SUP implementation would not expose people or structures to substantial adverse effects from surface rupture of a known active fault. [Threshold GEO-1.i].

Fourteen active faults are mapped in the District by the CGS (listed above). Alquist-Priolo Earthquake Fault Zones are mapped along seven of those faults (Santa Susana Fault, San Fernando Fault, Sierra Madre Fault,

⁴³ California Geological Survey. 2013. GIS Layer. *Zones of Required Investigation for Earthquake-Induced Landslides*.

5. Environmental Analysis GEOLOGY AND SOILS

Raymond Fault, Newport-Inglewood Fault Zone, Avalon-Compton Fault, and Cherry-Hill Fault; see Figure 5.6-1).

New Construction on New Property or Existing Campus

New construction on adjacent properties could expose people and structures to hazards from surface rupture of a known active fault if located near a fault. Before new construction could occur on new property, a seismic hazard evaluation would be required for the site, including review of Alquist-Priolo Earthquake Fault Zone maps to determine whether the property is in such a zone.

New construction on existing school campuses could lead to increases in the numbers of people on those campuses and thus would also require seismic hazard evaluations to ensure that increased numbers of people would not be exposed to hazards arising from surface rupture of a known active fault.

New Alquist-Priolo Earthquake Fault Zones could be designated within the life of the SUP. For instance, the Atwater Avenue Elementary School is within a newly proposed Alquist-Priolo Earthquake Fault Zone along the Hollywood fault on the Preliminary Review Hollywood quadrangle map issued in January 2014.⁴⁴ In the past LAUSD has demolished classroom buildings found to be on top of faults. LAUSD also has the option to hire a geologist to determine the exact location of the fault.

For each existing school or adjacent property where new construction may occur, the District conducts a review of seismic hazards following the OEHS CEQA Specification Manual, Appendix G: Supplemental Geohazard Assessment Scope of Work. This assessment includes a seismic database review, preparation of a draft report of findings and recommendations, and a final report. LAUSD follows a standard procedure for obtaining clearance for new buildings:

- Determine whether the site is in an Alquist-Priolo Earthquake Fault Zone
- Conduct a Seismic Hazard Evaluation
- Receive DSA design approval
- Submit to DSA oversight and inspections, as required, during construction
- Obtain DSA certification that each new school building meets State statutory safety requirements.

LAUSD seismic hazard analysis currently complies with the requirements of the CBC, *Guidelines for Evaluating and Mitigating Seismic Hazards in California* (CGS Special Publication 117), and the *Checklist for the Review of Engineering Geology and Seismology Reports for California Public Schools, Hospitals, and Essential Services Buildings* (CGS Note 48).^{45,46} Under the CBC and CGS the scope of geotechnical studies includes, at a minimum:

⁴⁴ California Geological Survey. 2013. GIS Layer. Zones of Required Investigation for Earthquake-Induced Landslides

⁴⁵ California Geological Survey (CGS). 2008, September 11. Guidelines for Evaluating and Mitigating Seismic Hazards in California (California Geological Survey Special Publication 117). <http://www.conservation.ca.gov/cgs/shzp/webdocs/Documents/sp117.pdf>.

⁴⁶ California Geological Survey (CGS). 2007, November 7. Note 48: Checklist for the Review of Engineering Geology and Seismology Reports for California Public Schools, Hospitals, and Essential Services Buildings. http://www.conservation.ca.gov/cgs/information/publications/cgs_notes/note_48/note_48.pdf.

5. Environmental Analysis

GEOLOGY AND SOILS

- A description of local and regional geologic conditions in the site vicinity
- A description of the geologic materials at the site
- Pertinent geologic maps depicting the local and regional geologic setting and the topography of the site
- Information on the current and historic ground water conditions beneath the site
- Information on a determination of whether or not the site is within a State of California Alquist-Priolo Earthquake Fault Zone for fault rupture
- An evaluation of the potential for fault surface rupture at the site
- Information on the distances to selected faults, and the maximum magnitudes of active and potentially active faults in the region
- Information on the magnitudes of historic earthquakes in the region, and the distances of those earthquake's epicenters from the site
- A preliminary evaluation of the potential for liquefaction at the site based on available published literature, ground water conditions, and soil properties
- A preliminary evaluation of the potential for landslides at the site based on available published literature, local topography, and soil and rock properties
- An evaluation of the site's location relative to known flood zones and dam inundation areas
- An evaluation of the site's location relative to the ocean or large bodies of confined water and the anticipated effects associated with tsunamis or seiches (oscillation waves in a body of water due to shaking or rupture).

The seismic hazard evaluation recommends measures, as appropriate, to reduce the risk of seismic related hazards. Each seismic hazard evaluation examines the potential for caving, ground motion, liquefaction, dynamic settlement, inundation, and landslides.

The SUP-related site-specific projects would continue to comply with seismic safety requirements of the LAUSD Supplemental Geohazard Assessment Scope of Work, CBC, DSA, and CDE. Surface rupture hazards from a known active fault would be less than significant.

Modernization, Repair, Replacement, Upgrade, Remodel, Renovation and Installation

These projects would occur on existing campuses and would not expand student capacity or total building area. Thus, these types of projects would not expose increased numbers of people or additional buildings to hazards from surface rupture of a fault.

5. Environmental Analysis GEOLOGY AND SOILS

Impact 5.6-2: SUP implementation would not expose people or structures to substantial adverse effects from strong ground shaking. [Threshold GEO-1.ii]

All SUP Projects

The District is in a seismically active region. Within 25 miles of the District, nine historical earthquakes reached magnitude 5 or more in a 75-year span (see Table 5.6-2). It is very likely that strong ground shaking will occur in the District within the lifetimes of buildings that would be built, modernized, and/or repaired under the SUP. As part of the environmental review for new construction projects, the LAUSD conducts a detailed review of seismic hazards as outlined under Impact 5.6-1.

The seismic hazard evaluation recommends mitigation measures, as appropriate, to reduce the risk of seismic related hazards. Each seismic hazard evaluation examines the potential for caving, ground motion, liquefaction, dynamic settlement, inundation, and landsliding.

The Seismic Hazard Mapping Act and Regulations state that the site-investigation reports must be prepared by a certified engineering geologist or registered civil engineer, who must have competence in the field of seismic hazard evaluation and mitigation, and be reviewed by a certified engineering geologist or registered civil engineer, also competent in the field of seismic hazard evaluation and mitigation.⁴⁷ Although the Seismic Hazards Mapping Act does not distinguish between the types of licensed professionals who may prepare and review the report, the current Business and Professions Code (Geologist and Geophysicist Act, Section 7832; and Professional Engineers Act, Section 6704) restricts the practice of these two professions. Because of the differing expertise and abilities of engineering geologists and civil engineers, the scope of the site-investigation report for the project may require that both types of professionals prepare and review the report, each practicing in the area of his or her expertise. Involvement of both engineering geologists and civil engineers will generally provide greater assurance that the hazards are properly identified, assessed, and mitigated. The State Mining and Geology Board recommends that engineering geologists and civil engineers conduct the assessment of the surface and subsurface geological/geotechnical conditions at the site, including off-site conditions, to identify potential hazards to the project. It is appropriate for the civil engineer to design and recommend mitigation measures. It also is appropriate for both engineering geologists and civil engineers to be involved in the implementation of the mitigation measures—engineering geologists to confirm the geological conditions and civil engineers to oversee the implementation of the approved mitigation measures.⁴⁸

LAUSD will prepare a Seismic Hazard Evaluation for school construction projects, where appropriate, to satisfy the following requirements: (1) Seismic Hazard Mapping Act (California Public Resources Code, Section 2690 et seq); (2) Title 24 of the California Code of Regulations; (3) Guidelines for Evaluating and Mitigating Seismic Hazards in California (State Mining and Geology Board Special Publication 117); (4) the California Geological Survey Checklist for the Review of Geological/Seismic Reports for California Public

⁴⁷ California Geological Survey (CGS). 2008, September 11. Guidelines for Evaluating and Mitigating Seismic Hazards in California (California Geological Survey Special Publication 117). <http://www.conservation.ca.gov/cgs/shzp/webdocs/Documents/sp117.pdf>.

⁴⁸ California Geological Survey (CGS). 2008, September 11. Guidelines for Evaluating and Mitigating Seismic Hazards in California (California Geological Survey Special Publication 117). <http://www.conservation.ca.gov/cgs/shzp/webdocs/Documents/sp117.pdf>.

5. Environmental Analysis

GEOLOGY AND SOILS

Schools, Hospitals, and Essential Services Buildings; and (5) LAUSD Supplemental Geohazard Assessment Scope of Work. Design and construction of new buildings and modernizations of existing buildings would comply with seismic safety requirements of the DSA and CBC outlined in this discussion of Impact 5.6-2. Potential hazards from strong ground shaking would be less than significant.

Impact 5.6-3: SUP implementation would not expose people or structures to substantial adverse effects from seismic-related ground failure, including liquefaction [Threshold GEO-1.iii]

New Construction on New Property or Existing Campus

Construction of new classrooms, either on new property adjacent to or on an existing school campus, could subject increased numbers of people and new structures to hazards from seismic-related ground failure, including liquefaction. For any project which requires site grading or new building construction, the District will have a geotechnical investigation conducted by a professional engineering geologist or licensed geotechnical engineer pursuant to requirements of the CBC, DSA, and CDE. Requirements for the geotechnical study are listed above in Section 5.6.1.1, *Regulatory Framework*.

As part of the geotechnical study the seismic hazard evaluation examines the potential for caving, ground motion, liquefaction, dynamic settlement, inundation, and landslides. The geotechnical study for each project site would evaluate liquefaction potential and provide required recommendations for foundation and building design to minimize hazards from liquefaction. The scope of the geotechnical investigation will include sampling and testing of subsurface soils, and assessment of liquefaction potential. The study, including applicable recommendations, will support compliance with the CBC, DSA, CDE and LAUSD Supplemental Geohazard Assessment. Project implementation would not expose people or structures to substantial hazards from seismic-related ground failure, including liquefaction, and impacts would be less than significant.

Modernization, Repair, Replacement, Upgrade, Remodel, Renovation and Installation

These projects would occur on existing campuses and would not expand student capacity or total building area. Thus, these types of projects would not expose increased numbers of people or buildings to hazards from liquefaction.

Implementation of site-specific SUP-related projects would not expose people or structures to substantial hazards from seismic-related ground failure, including liquefaction; therefore, impacts would be less than significant.

Impact 5.6-4: SUP implementation would not expose people or structures to substantial adverse effects from landslides. [Threshold GEO-1.iv]

New Construction on New Property or Existing Campus

LAUSD will not construct a school in areas that are prone to landslides. Construction of new classrooms, either on new property adjacent to or on an existing school campus, may be located in areas with hills which may subject increased numbers of people and new structures to hazards from landslides. For any project

5. Environmental Analysis GEOLOGY AND SOILS

which requires site grading or new building construction, the District shall have a geotechnical investigation conducted by a professional engineering geologist or licensed geotechnical engineer pursuant to requirements of the CBC, DSA, and CDE. The scope of the geotechnical investigation shall include sampling and testing of subsurface soils; assessment of existing landslide potential on and next to the site; and assessment of the potential for the project to increase landslide hazard on or next to the site. The geotechnical investigation report, including compliance with applicable recommendations, would support compliance with the CBC, DSA, CDE and LAUSD Supplemental Geohazard Assessment. Impacts from exposure of people or structures to substantial adverse effects from landslides would thus be less than significant.

Modernization, Repair, Replacement, Upgrade, Remodel, Renovation and Installation

These projects would occur on existing campuses and would not expand student capacity or total building area. Thus, these types of projects would not expose increased numbers of people or buildings to landslide hazards.

Impact 5.6-5: Implementation of SUP-related projects would not cause substantial soil erosion or loss of topsoil. [Threshold GEO-2]

New Construction on New Property or Existing Campus

New construction may disturb substantial amounts of soil depending on the type of project, and thus could cause extensive soil erosion if effective erosion control measures were not used. Construction projects one or more acres in area would prepare and implement SWPPPs specifying BMPs to be used during construction to minimize water pollution, including BMPs for erosion control and sediment control. Project requirements are outlined in LAUSD Supplemental Geohazard Assessment Scope of Work. Implementation of these measures would render any soil erosion impacts less than significant.

Modernization, Repair, Replacement, Upgrade, Remodel, Renovation and Installation

These projects would be required to prepare and implement SWPPPs pursuant to the Construction General Permit and LASUD ~~PDPs~~ standard conditions for stormwater. Soil erosion impacts would be less than significant.

Impact 5.6-6: SUP-related projects would not be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project and potentially result in on- or off-site collapsible soils, ground subsidence, or corrosive soils. [Threshold GEO-3]

COLLAPSIBLE SOILS

New Construction on New Property

Collapsible soils could be present on new property acquired for school construction. For any project which requires site grading or new building construction, the District shall have a geotechnical investigation conducted by a professional engineering geologist or licensed geotechnical engineer pursuant to requirements of the CBC, DSA, and CDE. The scope of the geotechnical investigation shall include sampling and testing

5. Environmental Analysis

GEOLOGY AND SOILS

of subsurface soils; assessment of site soils for collapsibility; and recommendations for measures such as remedial grading to minimize hazards from collapsible soils. The geotechnical investigation report, including applicable recommendations, would support compliance with the CBC, DSA, and CDE and LAUSD Supplemental Geohazard Assessment Scope of Work. Impacts from a site-specific project located on collapsible soils would be less than significant.

New Construction and Modernization on Existing Campus

New construction, modernization, repair, replacement, upgrade, remodel, renovation and installation projects would be located on existing developed campuses. Soils on existing campuses have been previously graded and compacted, thus reducing the potential for collapsible soils to be present. These types of projects would not be located on collapsible soils and would not expose increased numbers of people, or additional buildings, to hazards from collapsible soils.

GROUND SUBSIDENCE

All SUP Projects

Unmonitored extraction of oil and groundwater can lead to ground subsidence. To avoid overdraft of underlying groundwater basins are monitored and groundwater levels are managed at sustainable pumping rates by the Water Replenishment District of Southern California (WRD) in most of the part of the District south of downtown Los Angeles and the Los Angeles Department of Water and Power (LADWP) in most of the remainder of the District. Thus, substantial ground subsidence in the District due to groundwater withdrawal is unlikely.

Many District schools are near oil fields, specifically some schools in the South ~~Local District ESC area~~—Willowbrook in unincorporated Los Angeles County, Harbor Gateway in the City of Los Angeles, and the City of Gardena—and in the West ~~ESC area~~ Local District near Marina del Rey.

The City of Los Angeles requires monitoring and mitigation measures to prevent significant subsidence related to oil and gas extraction and mining activities under its Surface Mining District ordinance.⁴⁹

Groundwater management by the WRD and LADWP and prevention of subsidence due to oil and gas extraction pursuant to the City of Los Angeles Surface Mining District ordinance would minimize regional ground subsidence in the District. Implementation of the SUP would not subject people to substantial hazards from ground subsidence, and impacts would be less than significant.

CORROSIVE SOILS

All SUP Projects

Corrosive soils could be present at some project work sites. Construction on new properties as well as existing campuses may place metals and/or concrete on or in soils that could be corrosive. For any project which requires site grading or new building construction, the District's current procedure is to have a

⁴⁹ Section 13.03, City of Los Angeles Municipal Code.

5. Environmental Analysis GEOLOGY AND SOILS

geotechnical investigation conducted by a professional engineering geologist or licensed geotechnical engineer pursuant to requirements of the CBC, DSA, and CDE. The scope of the geotechnical investigation includes sampling and testing of subsurface soils and assessment of corrosion potential in site soils. Where geotechnical investigation reports recommended retention of a qualified corrosion engineer for recommending measures for minimizing corrosion to structures and other improvements in or on the soil, the District would retain such engineer and carry out the recommendations. The geotechnical investigation report, including compliance with applicable recommendations, would support compliance with the CBC, DSA, and CDE and LAUSD Supplemental Geohazard Assessment Scope of Work. Impacts from corrosive soils would be less than significant.

Impact 5.6-7 SUP implementation would not subject people or structures to substantial hazards from expansive soils. [Threshold GEO-4]

New Construction on New Property or Existing Campus

Expansive soils could be present at new properties acquired for school expansion. While soils on existing campuses have been previously graded and compacted, expansive soils may still be present at some sites. Geotechnical studies for each site would include testing of soil samples for expansion potential.

Building designs shall comply with the CBC, DSA, and CDE requirements for the preparation of a building specific geotechnical report assessing potential consequences of any liquefaction and soil strength loss, estimation of settlement, lateral movement, or reduction in foundation soil-bearing capacity, and discussion of mitigation measures that includes building design consideration. Building design considerations may include, but are not limited to ground stabilization, selection of appropriate foundation type and depths, selection of appropriate structural systems to accommodate anticipated displacements, or any combination of these measures. Compliance with geotechnical recommendations will meet requirements LAUSD Supplemental Geohazard Assessment Scope of Work, along with the CBC, the DSA, and the CDE. Impacts would be less than significant.

Modernization, Repair, Replacement, Upgrade, Remodel, Renovation and Installation

Modernization, repair, upgrade, and renovation projects would not develop new buildings for human occupancy and would not expand student capacity or total building area. Thus, these types of projects would not be located on expansive soil that would create substantial risks to life or property, or expose increased numbers of people or buildings to hazards from expansive soils. These impacts would be less than significant.

Impact 5.6-8 SUP implementation would not use septic tanks or alternative waste water disposal systems. [Threshold GEO-5]

All Project Types

The proposed project would be connected to the municipal sewer system, and no septic tanks or alternative waste water disposal systems would be necessary. No impact would occur.

5. Environmental Analysis

GEOLOGY AND SOILS

5.6.4 Applicable Regulations and Standard Conditions

State

- CCR, Title 5, Section 14010, 14011 and 14012: Standards for school site selection and acquisition
- CCR, Title 24, Part 2: California Building Code
- California Government Code, Section 8875.8: Unreinforced Masonry Law
- California Education Code, Section 17281: Field Act, along with Garrison Act and Green Acts
- California Education Code, Section 17212 and 17212.5: requirement for geological and soil engineering study
- CGS Special Publication 117, “Guidelines for Evaluating and Mitigating Seismic Hazards in California”
- CGS Note 48 “Checklist for the Review of Engineering Geology and Seismology Reports for California Public Schools, Hospitals, and Essential Services Buildings”
- California Department of Education. School Site Selection and Approval Guide. Appendix H: Factors to Be Included in a Geological and Environmental Hazards Report
- Division of the State Architect. Regulatory Document IR A-4, “Geological Hazard Studies for Schools”
- State Water Resources Control Board. General Construction Permit (Order No. 2012-0006-DWQ; NPDES No. CAS000002)

LAUSD Standard Conditions of Approval

- LAUSD ~~SC-GEO-1/OEHS CEQA Specification Manual, Appendix G, Supplemental Geohazard Assessment Scope of Work, December 2005, Revised June 2007.~~

5.6.5 Level of Significance Before Mitigation

Upon implementation of regulatory requirements and LAUSD Standard Conditions listed above, the following impacts would be less than significant: 5.6-1, 5.6-2, 5.6-3, 5.6-4, 5.6-5, 5.6-6, 5.6-7 and 5.6-8.

5.6.6 Mitigation Measures

No mitigation measures are required.

5. Environmental Analysis GEOLOGY AND SOILS

5.6.7 Level of Significance After Mitigation

Impacts would be less than significant.

5. Environmental Analysis

GEOLOGY AND SOILS

This page intentionally left blank.

5. Environmental Analysis

5.7 GREENHOUSE GAS EMISSIONS

This section of the EIR evaluates the potential for implementation of the SUP to cumulatively contribute to greenhouse gas (GHG) emission impacts in the District. Because individually no one project is large enough to single-handedly result in a significant increase in global concentrations of GHG emissions, project-related climate change impacts are inherently cumulative. The section discusses regulatory framework (plans and policies from several jurisdictional agencies and LAUSD Standard Conditions)~~plans and policies from several jurisdictional agencies and LAUSD standard conditions, guidelines, specifications, practices, policies, and project design features (LAUSD Standards)~~, along with the existing GHG emissions throughout the SUP area, and possible environmental impacts that may occur as SUP-related site-specific projects are implemented during future phases of the SUP and site-specific projects implemented under the SUP.

TERMINOLOGY

The following are definitions for terms used throughout this section.

Greenhouse gases (GHG). Gases in the atmosphere that absorb infrared light, thereby retaining heat in the atmosphere and contributing to a greenhouse effect.

Global warming potential (GWP). Metric used to describe how much heat a molecule of a greenhouse gas absorbs relative to a molecule of carbon dioxide (CO₂) over a given period of time (20, 100, and 500 years). CO₂ has a GWP of 1.

Carbon dioxide-equivalent (CO₂e). The standard unit to measure the amount of greenhouse gases in terms of the amount of CO₂ that would cause the same amount of warming. CO₂e is based on the GWP ratios between the various GHGs relative to CO₂.

MTCO₂e. Metric ton of CO₂e.

MMTCO₂e. Million metric tons of CO₂e.

Greenhouse Gases and Climate Change

Climate change is the variation of earth's climate over time, whether due to natural variability or as a result of human activities. Scientists have concluded that human activities are contributing to global climate change by adding large amounts of heat-trapping gases, known as GHG, to the atmosphere. The primary source of these GHG is fossil fuel use. The Intergovernmental Panel on Climate Change (IPCC) has identified four major GHG—water vapor,¹ CO₂, methane (CH₄), and ozone (O₃)—that are the likely causes of an increase in global average temperatures observed within the 20th and 21st centuries. Other GHG identified by the

¹ Water vapor (H₂O) is the strongest GHG and the most variable in its phases (vapor, cloud droplets, ice crystals). However, water vapor is not considered a pollutant.

5. Environmental Analysis

GREENHOUSE GAS EMISSIONS

IPCC that contribute to global warming to a lesser extent include nitrous oxide (N₂O) and fluorinated gases.^{2,3} The major GHGs are briefly described below.

Carbon dioxide (CO₂) enters the atmosphere through the burning of fossil fuels (oil, natural gas, and coal), solid waste, trees and wood products, and respiration, and as a result of other chemical reactions (e.g., manufacture of cement). Carbon dioxide is removed from the atmosphere (sequestered) when it is absorbed by plants as part of the biological carbon cycle.

Methane (CH₄) is emitted during the production and transport of coal, natural gas, and oil. Methane emissions also result from livestock and other agricultural practices and from the decay of organic waste in municipal landfills and water treatment facilities.

Nitrous oxide (N₂O) is emitted during agricultural and industrial activities as well as during combustion of fossil fuels and solid waste.

Fluorinated gases are synthetic, strong GHGs that are emitted from a variety of industrial processes. Fluorinated gases are sometimes used as substitutes for ozone-depleting substances. These gases are typically emitted in smaller quantities, but they are potent GHGs, sometimes referred to as high GWP gases.

- **Sulfur Hexafluoride (SF₆)** is a colorless gas soluble in alcohol and ether, slightly soluble in water. SF₆ is a strong GHG used primarily in electrical transmission and distribution systems as an insulator.
- **Hydrofluorocarbons (HFCs)** contain only hydrogen, fluorine, and carbon atoms. They were introduced as alternatives to ozone-depleting substances to serve many industrial, commercial, and personal needs. HFCs are emitted as by-products of industrial processes and are also used in manufacturing. They do not significantly deplete the stratospheric ozone layer, but they are strong GHGs.⁴
- **Hydrochlorofluorocarbons (HCFCs)** contain hydrogen, fluorine, chlorine, and carbon atoms. Although ozone-depleting substances, they are less potent at destroying stratospheric ozone than CFCs. They have been introduced as temporary replacements for CFCs and are GHGs.
- **Perfluorocarbons (PFCs)** are a group of human-made chemicals composed of carbon and fluorine only. These chemicals (predominantly perfluoromethane [CF₄] and perfluoroethane [C₂F₆]) were introduced as alternatives, along with HFCs, to the ozone-depleting substances. In addition, PFCs are emitted as by-products of industrial processes and are also used in manufacturing. PFCs do not harm the stratospheric ozone layer, but they have a high global warming potential.

² Intergovernmental Panel on Climate Change (IPCC). 2001. "2001 IPCC Third Assessment Report: Climate Change 2001."

³ Black carbon contributes to climate change both directly, by absorbing sunlight, and indirectly, by depositing on snow (making it melt faster) and by interacting with clouds and affecting cloud formation. Black carbon is the most strongly light-absorbing component of particulate matter (PM) emitted from burning fuels such as coal, diesel, and biomass. Reducing black carbon emissions globally can have immediate economic, climate, and public health benefits. California has been an international leader in reducing emissions of black carbon, with close to 95 percent control expected by 2020 due to existing programs that target reducing PM from diesel engines and burning activities (California Air Resources Board. 2014, February 10. Proposed First Update to the Climate Change Scoping: Building on the Framework. http://www.arb.ca.gov/cc/scopingplan/2013_update/discussion_draft.pdf).

⁴<http://www.epa.gov/climatechange/ghgemissions/gases.html>.

5. Environmental Analysis GREENHOUSE GAS EMISSIONS

- Chlorofluorocarbons (CFCs)** are GHGs covered under the 1987 Montreal Protocol and used for refrigeration, air conditioning, packaging, insulation, solvents, or aerosol propellants. Since they are not destroyed in the lower atmosphere (troposphere, stratosphere), CFCs drift into the upper atmosphere where, given suitable conditions, they break down ozone. These gases are therefore being replaced by other GHG compounds covered under the Kyoto Protocol.

Table 5.7-1 lists the GHG applicable to the SUP and its relative global warming potential (GWP).

Table 5.7-1 GHG and Their Relative Global Warming Potential Compared to CO₂

GHG	Atmospheric Lifetime (years)	Global Warming Potential Relative to CO ₂ ^a
Carbon Dioxide (CO ₂)	50 to 200	1
Methane (CH ₄) ^b	12 (±3)	21
Nitrous Oxide (N ₂ O)	120	310
Hydrofluorocarbons:		
HFC-23	264	11,700
HFC-32	5.6	650
HFC-125	32.6	2,800
HFC-134a	14.6	1,300
HFC-143a	48.3	3,800
HFC-152a	1.5	140
HFC-227ea	36.5	2,900
HFC-236fa	209	6,300
HFC-4310mee	17.1	1,300
Perfluoromethane: CF ₄	50,000	6,500
Perfluoroethane: C ₂ F ₆	10,000	9,200
Perfluorobutane: C ₄ F ₁₀	2,600	7,000
Perfluoro-2-methylpentane: C ₆ F ₁₄	3,200	7,400
Sulfur Hexafluoride (SF ₆)	3,200	23,900

Source: Intergovernmental Panel on Climate Change (IPCC). 2001. 2001 IPCC Third Assessment Report: Climate Change 2001; U.S. Environmental Protection Agency (USEPA), 2012. Greenhouse Gas Emissions.

^a Based on 100-Year Time Horizon of the Global Warming Potential (GWP) of the air pollutant relative to CO₂.

^b The methane GWP includes the direct effects and those indirect effects due to the production of tropospheric ozone and stratospheric water vapor. The indirect effect due to the production of CO₂ is not included.

5.7.1 Environmental Setting

5.7.1.1 REGULATORY FRAMEWORK

National, and State laws, regulations, plans, and guidelines are summarized below. The following regulatory framework discussion does not include all plans and policies that relate to GHG 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 date when a proposed site-specific school project undergoes review. Therefore, this section provides a general discussion of the most important of these matters that apply to SUP projects. Some of

5. Environmental Analysis

GREENHOUSE GAS EMISSIONS

these are not directly applicable to the SUP or site-specific projects implemented under the SUP; however, they are included to assist in identifying potential impacts and significance thresholds. Applicable LAUSD ~~Standards~~ Standard Conditions of Approval are also listed. See *Applicable Regulations and Standard Conditions* at end of this chapter for those that require District compliance.

Federal

The United States Environmental Protection Agency (EPA) announced on December 7, 2009, that GHG emissions threaten the public health and welfare of the American people and that GHG emission from on-road vehicles contribute to that threat. The EPA's final findings respond to the 2007 U.S. Supreme Court decision that GHG emissions fit within the Clean Air Act definition of air pollutants. The findings do not in and of themselves impose any emission reduction requirements, but allow the EPA to finalize the GHG standards proposed in 2009 for new light-duty vehicles as part of the joint rulemaking with the Department of Transportation.⁵

The EPA's endangerment finding covers emissions of six key GHGs—CO₂, CH₄, N₂O, hydrofluorocarbons, perfluorocarbons, and SF₆—which have been the subject of scrutiny and intense analysis for decades by scientists in the United States and around the world.

In response to the endangerment finding, the EPA issued the Mandatory Reporting of GHG Rule that requires substantial emitters of GHG emissions (large stationary sources, etc.) to report GHG emissions data. Facilities that emit 25,000 MTCO_{2e} or more per year are required to submit an annual report.

State

Executive Order S-03-05

Executive Order S-3-05, signed June 1, 2005, set the following GHG reduction targets for the state:

- 2000 levels by 2010
- 1990 levels by 2020
- 80 percent below 1990 levels by 2050

Assembly Bill 32, the Global Warming Solutions Act (2006)

Current State of California guidance and goals for reductions in GHG emissions are generally embodied in AB 32, the Global Warming Solutions Act. AB 32 was passed by the California state legislature on August 31, 2006, to place the state on a course toward reducing its contribution of GHG emissions. AB 32 follows the 2020 tier of emissions reduction targets established in Executive Order S-3-05.

AB 32 directed the California Air Resources Board (CARB) to adopt discrete early action measures to reduce GHG emissions and outline additional reduction measures to meet the 2020 target. Based on the GHG emissions inventory conducted for the Scoping Plan by CARB, GHG emissions in California by 2020 are

⁵ U.S. Environmental Protection Agency (USEPA). 2009, December. EPA: Greenhouse Gases Threaten Public Health and the Environment. Science overwhelmingly shows greenhouse gas concentrations at unprecedented levels due to human activity. <http://yosemite.epa.gov/opa/admpress.nsf/0/08D11A451131BCA585257685005BF252>.

5. Environmental Analysis GREENHOUSE GAS EMISSIONS

anticipated to be approximately 596 MMTCO₂e. In December 2007, CARB approved a 2020 emissions limit of 427 MMTCO₂e (471 million tons) for the state. The 2020 target requires a total emissions reduction of 169 MMTCO₂e, 28.5 percent from the projected emissions of the business-as-usual (BAU) scenario for the year 2020 (i.e., 28.5 percent of 596 MMTCO₂e).^{6,7}

In order to effectively implement the emissions cap, AB 32 directed CARB to establish a mandatory reporting system to track and monitor GHG emissions levels for large stationary sources that generate more than 25,000 MT of CO₂e per year, prepare a plan demonstrating how the 2020 deadline can be met, and develop appropriate regulations and programs to implement the plan by 2012. The Climate Action Registry Reporting Online Tool was established through the Climate Action Registry to track GHG emissions.

CARB 2008 Scoping Plan

The final Scoping Plan was adopted by CARB on December 11, 2008. Key elements of CARB's GHG reduction plan that may be applicable to the SUP include:

- Expanding and strengthening existing energy efficiency programs as well as building and appliance standards (adopted and cycle updates in progress).
- Achieving a mix of 33 percent for energy generation from renewable sources (anticipated by 2020).
- A California cap-and-trade program that links with other Western Climate Initiative (WCI) partner programs to create a regional market system for large stationary sources (adopted 2011).
- Establishing targets for transportation-related GHG emissions for regions throughout California, and pursuing policies and incentives to achieve those targets (several Sustainable Communities Strategies have been adopted).
- Adopting and implementing measures pursuant to state laws and policies, including California's clean car standards (amendments to the Pavley Standards adopted 2009; Advanced Clean Car standard adopted 2012), goods movement measures, and the Low Carbon Fuel Standard (LCFS) (adopted 2009).⁸

⁶ California Air Resources Board. 2008, October. Climate Change Proposed Scoping Plan, a Framework for Change.

⁷ CARB defines BAU in its Scoping Plan as emissions levels that would occur if California continued to grow and add new GHG emissions but did not adopt any measures to reduce emissions. Projections for each emission-generating sector were compiled and used to estimate emissions for 2020 based on 2002–2004 emissions intensities. Under CARB's definition of BAU, new growth is assumed to have the same carbon intensities as was typical from 2002 through 2004.

⁸ On December 29, 2011, the U.S. District Court for the Eastern District of California issued several rulings in the federal lawsuits challenging the LCFS. One of the court's rulings preliminarily enjoins the CARB from enforcing the regulation during the pendency of the litigation. In January 2012, CARB appealed the decision and on April 23, 2012, the Ninth Circuit Court granted CARB's motion for a stay of the injunction while it continues to consider CARB's appeal of the lower court's decision. On July 15, 2013, the State of California Court of Appeals held that the LCFS would remain in effect and that CARB can continue to implement and enforce the 2013 regulatory standards while it corrects certain aspects of the procedures by which the LCFS was adopted. Accordingly, CARB is continuing to implement and enforce the LCFS while addressing the court's concerns.

5. Environmental Analysis

GREENHOUSE GAS EMISSIONS

- Creating target fees, including a public goods charge on water use, fees on high global warming potential gases, and a fee to fund the administrative costs of the state's long-term commitment to AB 32 implementation (in progress).

Table 5.7-2 shows the proposed reductions from regulations and programs outlined in the Scoping Plan. While local government operations were not accounted for in achieving the 2020 emissions reduction, CARB estimates that land use changes implemented by local governments that integrate jobs, housing, and services result in a reduction of 5 MMTCO_{2e}, which is approximately 3 percent of the 2020 GHG emissions reduction goal. In recognition of the critical role local governments play in the successful implementation of AB 32, CARB is recommending GHG reduction goals of 15 percent of today's levels by 2020 to ensure that municipal and community-wide emissions match the state's reduction target.⁹ Measures that local governments take to support shifts in land use patterns are anticipated to emphasize compact, low-impact growth over development in greenfields, resulting in fewer vehicle miles travelled (VMT).¹⁰

2008 Scoping Plan Update

Since release of the 2008 Scoping Plan, CARB has updated the statewide GHG emissions inventory to reflect GHG emissions in light of the economic downturn and of measures not considered in the 2008 Scoping Plan baseline inventory. The updated forecast predicts emissions to be 507 MMTCO_{2e} by 2020. The new inventory identifies that an estimated 80 MMTCO_{2e} of reductions are necessary to achieve the statewide emissions reduction of AB 32 by 2020, 15.7 percent of the projected emissions compared to BAU in year 2020 (i.e., 15.7 percent of 507 MMTCO_{2e}).¹¹

CARB is in the process of completing a five-year update to the 2008 Scoping Plan, as required by AB 32. It released the draft of the proposed 2013 Scoping Plan on February 10, 2014. The 2013 Scoping Plan update defines CARB's climate change priorities for the next five years and lays the groundwork to reach post-2020 goals in Executive Orders S-3-05 and B-16-2012. The update includes the latest scientific findings related to climate change and its impacts, including short-lived climate pollutants. The GHG target identified in the 2008 Scoping Plan is based on IPCC's GWP identified in the Second and Third Assessment Reports. IPCC's Fourth Assessment Report identified more recent GWP values based on the latest available science. As a result, CARB recalculated the 1990 GHG emission levels with these updated GWPs. Using the new GWPs, the 427 MMTCO_{2e} 1990 emissions level and 2020 GHG emissions limit, established in response to AB 32, would be slightly higher at 431 MMTCO_{2e}.¹²

The 2013 update highlights California's progress toward meeting the near-term 2020 GHG emission reduction goals defined in the original 2008 Scoping Plan. As identified in the 2013 Scoping Plan update,

⁹ Although the Scoping Plan references a goal for local governments to reduce community GHG emissions by 15 percent from current (interpreted as 2008) levels by 2020, it does not rely on local GHG reduction targets established by local governments to meet the state's GHG reduction target of AB 32. Table 5.6-3 lists the recommended reduction measures, which do not include additional reductions from local measures.

¹⁰ California Air Resources Board. 2008, October. Climate Change Proposed Scoping Plan, a Framework for Change.

¹¹ California Air Resources Board. 2012. Status of Scoping Plan Recommended Measures. http://www.arb.ca.gov/cc/scopingplan/status_of_scoping_plan_measures.pdf.

¹² California Air Resources Board (CARB). 2014, February 10. Proposed First Update to the Climate Change Scoping: Building on the Framework. http://www.arb.ca.gov/cc/scopingplan/2013_update/discussion_draft.pdf.

5. Environmental Analysis GREENHOUSE GAS EMISSIONS

California is on track to meeting the goals of AB 32. However, the 2013 Scoping Plan also addresses the state's longer-term GHG goals in a post-2020 element. The post-2020 element provides an overview of a long-term strategy for meeting the 2050 GHG goals, including a recommendation for the state to adopt a midterm target. According to the 2013 Scoping Plan, reducing emissions to 80 percent below 1990 levels will require a fundamental shift to efficient, clean energy in every sector of the economy. Progressing toward California's 2050 climate targets will require significant acceleration of GHG reduction rates. Emissions from 2020 to 2050 will have to decline several times faster than the rate needed to reach the 2020 emissions limit.¹³

Table 5.7-2 Scoping Plan GHG Reduction Measures and 2020 State Target

Recommended Reduction Measures	Reductions Counted toward 2020 Target of 169 MMTCO _{2e}	Percentage of Statewide 2020 Target
Cap and Trade Program and Associated Measures		
California Light-Duty Vehicle GHG Standards	31.7	19%
Energy Efficiency	26.3	16%
Renewable Portfolio Standard (33 percent by 2020)	21.3	13%
Low Carbon Fuel Standard	15	9%
Regional Transportation-Related GHG Targets ^a	5	3%
Vehicle Efficiency Measures	4.5	3%
Goods Movement	3.7	2%
Million Solar Roofs	2.1	1%
Medium/Heavy Duty Vehicles	1.4	1%
High Speed Rail	1.0	1%
Industrial Measures	0.3	0%
Additional Reduction Necessary to Achieve Cap	34.4	20%
Total Cap and Trade Program Reductions	146.7	87%
Uncapped Sources/Sectors Measures		
High Global Warming Potential Gas Measures	20.2	12%
Sustainable Forests	5	3%
Industrial Measures (for sources not covered under cap and trade program)	1.1	1%
Recycling and Waste (landfill methane capture)	1	1%
Total Uncapped Sources/Sectors Reductions	27.3	16%
Total Reductions Counted toward 2020 Target	174	100%
Other Recommended Measures – Not Counted toward 2020 Target		
State Government Operations	1.0 to 2.0	1%
Local Government Operations ^b	To Be Determined	NA
Green Buildings	26	15%
Recycling and Waste	9	5%
Water Sector Measures	4.8	3%
Methane Capture at Large Dairies	1	1%
Total Other Recommended Measures – Not Counted toward 2020 Target	42.8	NA

Source: California Air Resources Board. 2008, October. Climate Change Proposed Scoping Plan, a Framework for Change.

Notes: The percentages in the right-hand column add up to more than 100 percent because the emissions reduction goal is 169 MMTCO_{2e} and the Scoping Plan

¹³ California Air Resources Board (CARB). 2014, February 10. Proposed First Update to the Climate Change Scoping: Building on the Framework. http://www.arb.ca.gov/cc/scopingplan/2013_update/discussion_draft.pdf.

5. Environmental Analysis GREENHOUSE GAS EMISSIONS

Table 5.7-2 Scoping Plan GHG Reduction Measures and 2020 State Target

Recommended Reduction Measures	Reductions Counted toward 2020 Target of 169 MMTCO _{2e}	Percentage of Statewide 2020 Target
identifies 174 MMTCO _{2e} of emissions reductions strategies. MMTCO _{2e} : million metric tons of CO _{2e} ^a Reductions represent an estimate of what may be achieved from local land use changes. It is not the SB 375 regional target. ^b According to the Measure Documentation Supplement to the Scoping Plan, local government actions and targets are anticipated to reduce vehicle miles by approximately 2 percent through land use planning, resulting in a potential GHG reduction of 2 million metric tons of CO _{2e} (or approximately 1.2 percent of the GHG reduction target). However, these reductions were not included in the Scoping Plan reductions to achieve the 2020 target.		

Senate Bill 375

In 2008, SB 375 was adopted to achieve the GHG reduction targets in the Scoping Plan for the transportation sector through local land use decisions that affect travel behavior. Implementation is intended to reduce VMT and GHG emissions from light-duty trucks and automobiles (excludes emissions associated with goods movement) by aligning regional long-range transportation plans, investments, and housing allocations with local land use planning. Specifically, SB 375 requires CARB to establish GHG emissions reduction targets for each of the 17 regions in California managed by a metropolitan planning organization (MPO). Pursuant to the recommendations of the Regional Transportation Advisory Committee, CARB adopted per capita reduction targets for each of the MPOs rather than a total magnitude reduction target. The Southern California Association of Governments (SCAG) is the MPO for the southern California region, which includes the counties of Los Angeles, Orange, San Bernardino, Riverside, Ventura, and Imperial. SCAG's targets are an 8 percent per capita reduction from 2005 GHG emission levels by 2020 and a 13 percent per capita reduction from 2005 GHG emission levels by 2035.

The 2020 targets are smaller than the 2035 targets because a significant portion of the built environment in 2020 has been defined by decisions that have already been made. In general, the 2020 scenarios reflect that more time is needed for large land use and transportation infrastructure changes. Most of the reductions in the interim are anticipated to come from improving the efficiency of the region's existing transportation network. The targets would result in 3 MMTCO_{2e} of GHG reductions by 2020 and 15 MMTCO_{2e} of GHG reductions by 2035. Based on these reductions, the passenger vehicle target in CARB's Scoping Plan (for AB 32) would be met.¹⁴

SB 375 requires the MPOs to prepare a Sustainable Communities Strategy (SCS) in their regional transportation plan. For the SCAG region, the SCS was adopted April 2012 (SCAG 2012). The SCS establishes a development pattern for the region, which, when integrated with the transportation network and other transportation measures and policies, would reduce GHG emissions from transportation (excluding goods movement). The SCS is meant to provide growth strategies that will achieve the regional GHG emissions reduction targets. The SCS does not require that local general plans, specific plans, or zoning be consistent with the SCS, but provides incentives for consistency for governments and developers.

¹⁴ California Air Resources Board. 2010, August. Staff Report Proposed Regional Greenhouse Gas Emission Reduction Targets for Automobiles and Light Trucks Pursuant to Senate Bill 375.

5. Environmental Analysis GREENHOUSE GAS EMISSIONS

Assembly Bill 1493

California vehicle GHG emission standards were enacted under AB 1493 (Pavley I). Pavley I is a clean-car standard that reduces GHG emissions from new passenger vehicles (light-duty auto to medium-duty vehicles) from 2009 through 2016 and is anticipated to reduce GHG emissions from new passenger vehicles by 30 percent in 2016. California implements the Pavley I standards through a waiver granted to California by the EPA. In 2012, the EPA issued a Final Rulemaking that sets even more stringent fuel economy and GHG emissions standards for model year 2017 through 2025 light-duty vehicles.

Executive Order S-01-07

On January 18, 2007, the state set a new LCFS for transportation fuels sold within the state. Executive Order S-1-07 sets a declining standard for GHG emissions measured in CO_{2e} grams per unit of fuel energy sold in California. The LCFS requires a reduction of 2.5 percent in the carbon intensity of California's transportation fuels by 2015 and a reduction of at least 10 percent by 2020. The LCFS applies to refiners, blenders, producers, and importers of transportation fuels and would use market-based mechanisms to allow these providers to choose how they reduce emissions during the fuel cycle using the most economically feasible methods.

Senate Bills 1078 and 107 and Executive Order S-14-08

A major component of California's Renewable Energy Program is the renewable portfolio standard (RPS) established under Senate Bills 1078 (Sher) and 107 (Simitian). Under the RPS, certain retail sellers of electricity were required to increase the amount of renewable energy each year by at least 1 percent in order to reach at least 20 percent by December 30, 2010. Executive Order S-14-08 was signed in November 2008, which expands the state's renewable energy standard to 33 percent renewable power by 2020. In 2011, the state legislature adopted this higher standard in Senate Bill X1-2. Renewable sources of electricity include wind, small hydropower, solar, geothermal, biomass, and biogas. The increase in renewable sources for electricity production will decrease indirect GHG emissions from development projects, because electricity production from renewable sources is generally considered carbon neutral.

Executive Order B-16-2012

On March 23, 2012, the state directed CARB, the California Energy Commission, California Public Utilities Commission, and other relevant agencies to work with the Plug-in Electric Vehicle Collaborative and the California Fuel Cell Partnership to establish benchmarks to accommodate zero-emissions vehicles in major metropolitan areas, including infrastructure to support zero-emissions vehicles (e.g., electric vehicle charging stations). The executive order also directed that the number of zero-emission vehicles in California's state vehicle fleet increase through the normal course of fleet replacement so that at least 10 percent of fleet purchases of light-duty vehicles are zero emission by 2015 and at least 25 percent of fleet purchases of light-duty vehicles are zero emission by 2020. The executive order also establishes a target for reducing GHG emissions from the transportation sector of 80 percent below 1990 levels.

5. Environmental Analysis GREENHOUSE GAS EMISSIONS

California Code of Regulations, Title 24, Part 6

Energy conservation standards for new residential and nonresidential buildings were adopted by the California Energy Resources Conservation and Development Commission in June 1977 and are updated tri-annually in the **California Building Code**. Title 24, Part 6 requires the design of building shells and building components to conserve energy. The standards are updated periodically to allow for consideration and possible incorporation of new energy efficiency technologies and methods.

On May 31, 2012, the California Energy Commission adopted the 2013 Building Energy Efficiency Standards, which went into effect on January 1, 2014. Buildings that are constructed in accordance with the 2013 Building and Energy Efficiency Standards are 25 percent (residential) to 30 percent (nonresidential) more energy efficient than the 2008 standards as a result of better windows, insulation, lighting, ventilation systems, and other features that reduce energy consumption in homes and businesses.

California Code of Regulations, Title 24, Part 11

On July 17, 2008, the California Building Standards Commission adopted the nation's first green building standards. The California Green Building Standards Code (CALGreen) was adopted as part of the California Building Standards Code (Part 11, Title 24, California Code of Regulations). CALGreen established planning and design standards for sustainable site development, energy efficiency (in excess of the California Energy Code requirements), water conservation, material conservation, and internal air contaminants.¹⁵ The mandatory provisions of the California Green Building Code Standards became effective January 1, 2011.

California Code of Regulations, Title 20, Sections 1601 through 1608

The 2006 **Appliance Efficiency Regulations** were adopted by the California Energy Commission on October 11, 2006, and approved by the California Office of Administrative Law on December 14, 2006. The regulations include standards for both federally regulated appliances and non-federally regulated appliances.

LAUSD

Standard Conditions of Approval

LAUSD Standards

This table lists the GHG related standard conditions and project design features that ~~are~~ will be included as part of each SUP-related project, as appropriate.

PDF Reference #	Topic	Trigger for Compliance	Implementation Phase	Standard Conditions of Approval/Standard Conditions
SC-USS-10 Compliance	Construction waste-Waste management Management	When projects will generate construction and/or demolition debris	Prior to start of and during construction	School Design Guide, & Specification 01340, Construction & Demolition Waste Management Construction and demolition waste shall be recycled to the maximum extent feasible. LAUSD has established a minimum non-hazardous construction and

¹⁵ The green building standards became mandatory in the 2010 edition of the code.

5. Environmental Analysis GREENHOUSE GAS EMISSIONS

PDF Reference #	Topic	Trigger for Compliance	Implementation Phase	Standard Conditions of Approval Standard Conditions
				<p>demolition debris recycling requirement of 75% by weight as defined in Specification 01340, Construction & Demolition Waste Management. (School Design Guide, January 2014)</p> <p>Specification 01340, Construction & Demolition Waste Management. Specification Guide Specifications 2004 - Section -01340, Construction & Demolition Waste Management. This section of the LAUSD Specifications includes procedures for preparation and implementation, including reporting and documentation, of a Waste Management Plan for reusing, recycling, salvage or disposal of non-hazardous waste materials generated during demolition and/or new construction (Construction & Demolition (C&D) Waste), to foster material recovery and re-use and to minimize disposal in landfills. Requires the collection and separation of all C&D waste materials generated on-site, reuse or recycling on-site, transportation to approved recyclers or reuse organizations, or transportation to legally designated landfills, for the purpose of recycling salvaging and/or reusing a minimum of 75% of the C&D waste generated. (Specification 01340, Construction & Demolition Waste Management, July 7, 2003)</p>
Project Design Features				
SC-GHG-1	Water use and efficiency	Requires if project include work on water pumps, valves, piping, and/or tanks.	During school operation	During school operation, LAUSD shall perform regular preventative maintenance on pumps, valves, piping, and tanks to minimize water loss.
SC-GHG-2	Water use and efficiency	Requires if projects involve work on landscape irrigation system.	Prior to full operation of irrigation system	LAUSD shall utilize automatic sprinklers set to irrigate landscaping during the early morning and evening hours to reduce water loss from evaporation.
SC-GHG-3	Water use and efficiency	Requires if projects involve work on landscape irrigation system.	Prior to full operation of irrigation system	LAUSD shall reset automatic sprinkler timers to water less during cooler months and rainy season.
SC-GHG-4	Water use and efficiency	Requires if projects involve work on landscape and/or irrigation system.	Prior to full operation of irrigation system	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	Energy efficiency	If project involves a building construction	Prior to occupancy	LAUSD shall ensure that the time dependent valued energy of the proposed project design is at least 10 percent, with a goal of 20 percent less than a standard design that is in minimum compliance with the California Title 24, Part 6 energy efficiency standards that are in force at the time the project is submitted to the Division of the State Architect.

5. Environmental Analysis

GREENHOUSE GAS EMISSIONS

5.7.1.2 EXISTING CONDITIONS

California's GHG Sources and Relative Contribution

California is the second largest emitter of GHG in the United States, only surpassed by Texas, and the tenth largest GHG emitter in the world. However, California also has over 12 million more people than the state of Texas. Because of more stringent air emission regulations, in 2001 California ranked fourth lowest in carbon emissions per capita and fifth lowest among states in CO₂ emissions from fossil fuel consumption per unit of Gross State Product (total economic output of goods and services).¹⁶

CARB's latest update to the statewide GHG emissions inventory was conducted in 2012 for year 2009 emissions.¹⁷ In 2009, California produced 457 MMTCO₂e GHG emissions.¹⁸ California's transportation sector is the single largest generator of GHG emissions, producing 37.9 percent of the state's total emissions. Electricity consumption is the second largest source, comprising 22.7 percent. Industrial activities are California's third largest source of GHG emissions, comprising 17.8 percent of the state's total emissions. Other major sources of GHG emissions include commercial and residential, recycling and waste, high global warming potential GHGs, agriculture, and forestry.¹⁹

Human Influence on Climate Change

For approximately 1,000 years before the Industrial Revolution, the amount of GHG in the atmosphere remained relatively constant. During the 20th century, however, scientists observed a rapid change in the climate and climate change pollutants that are attributable to human activities. The amount of CO₂ has increased by more than 35 percent since preindustrial times and has increased at an average rate of 1.4 parts per million (ppm) per year since 1960, mainly due to combustion of fossil fuels and deforestation (IPCC 2007). These recent changes in climate change pollutants far exceed the extremes of the ice ages, and the global mean temperature is warming at a rate that cannot be explained by natural causes alone. Human activities are directly altering the chemical composition of the atmosphere through the buildup of climate change pollutants.²⁰

Climate change scenarios are affected by varying degrees of uncertainty. IPCC's 2007 Fourth Assessment Report projects that the global mean temperature increase from 1990 to 2100, under different climate-change scenarios, will range from 1.4 to 5.8°C (2.5 to 10.4°F). In the past, gradual changes in the earth's temperature changed the distribution of species, availability of water, etc. However, human activities are accelerating this

¹⁶ California Energy Commission. 2006, December. Inventory of California Greenhouse Gas Emissions and Sinks 1990 to 2004. Report CEC-600-2006-013-SF.

¹⁷ Methodology for determining the statewide GHG inventory is not the same as the methodology used to determine statewide GHG emissions under Assembly Bill 32 (AB 32).

¹⁸ CO₂-equivalence is used to show the relative potential that different GHGs have to retain infrared radiation in the atmosphere and contribute to the greenhouse effect. The global warming potential of a GHG is also dependent on the lifetime, or persistence, of the gas molecule in the atmosphere.

¹⁹ California Air Resources Board. 2012, April. California Greenhouse Gas Inventory for 2000–2009. By Category as Defined by the Scoping Plan.

²⁰ California Climate Action Team (CAT). 2006, March. Climate Action Team Report to Governor Schwarzenegger and the Legislature.

5. Environmental Analysis GREENHOUSE GAS EMISSIONS

process so that environmental impacts associated with climate change no longer occur in a geologic timeframe but within a human lifetime.²¹

Potential Climate Change Impacts for California

Like the variability in the projections of the expected increase in global surface temperatures, the environmental consequences of gradual changes in the Earth's temperature are also hard to predict. In California and western North America, observations of the climate have shown: 1) a trend toward warmer winter and spring temperatures, 2) a smaller fraction of precipitation is falling as snow, 3) a decrease in the amount of spring snow accumulation in the lower and middle elevation mountain zones, 4) an advance snowmelt of 5 to 30 days earlier in spring, and 5) a similar shift (5 to 30 days earlier) in the timing of spring flower blooms.²² According to the California Climate Action Team (CAT), even if actions could be taken to immediately curtail climate change emissions, the potency of emissions that have already built up, their long atmospheric lifetimes (see Table 5.7-1), and the inertia of the Earth's climate system could produce as much as 0.6°C (1.1°F) of additional warming. Consequently, some impacts from climate change are now considered unavoidable. Global climate change risks are shown in Table 5.7-3 and include impacts to public health, water resources, agriculture, sea level, forest and biological resources, and electricity impacts. Specific climate change impacts that could affect the SUP include health impacts from a reduction in air quality, water resources impacts from a reduction in water supply, and increased energy demand.

Table 5.7-3 Summary of Global Climate Change Risks to California

Impact Category	Potential Risk
Public Health Impacts	<ul style="list-style-type: none"> • Poor air quality made worse • More severe heat
Water Resources Impacts	<ul style="list-style-type: none"> • Decreasing Sierra Nevada snow pack • Challenges in securing adequate water supply • Potential reduction in hydropower • Loss of winter recreation
Agricultural Impacts	<ul style="list-style-type: none"> • Increasing temperature • Increasing threats from pests and pathogens • Expanded ranges of agricultural weeds • Declining productivity • Irregular blooms and harvests
Coastal Sea Level Impacts	<ul style="list-style-type: none"> • Accelerated sea level rise • Increasing coastal floods • Shrinking beaches • Worsened impacts on infrastructure
Forest and Biological Resource Impacts	<ul style="list-style-type: none"> • Increasing risk and severity of wildfires • Lengthening of the wildfire season • Movement of forest areas • Conversion of forest to grassland • Increasing threats from pest and pathogens • Declining forest productivity

²¹ California Climate Action Team (CAT). 2006, March. Climate Action Team Report to Governor Schwarzenegger and the Legislature.

²² California Climate Action Team (CAT). 2006, March. Climate Action Team Report to Governor Schwarzenegger and the Legislature.

5. Environmental Analysis

GREENHOUSE GAS EMISSIONS

Table 5.7-3 Summary of Global Climate Change Risks to California

Impact Category	Potential Risk
	<ul style="list-style-type: none"> • Shifting vegetation and species distribution • Altered timing of migration and mating habits • Loss of sensitive or slow-moving species
Electricity	<ul style="list-style-type: none"> • Potential reduction in hydropower • Increased energy demand

Sources: California Energy Commission. 2006. Our Changing Climate, Assessing the Risks to California, 2006 Biennial Report, California Climate Change Center, CEC-500-2006-077; California Energy Commission (CEC). 2008. The Future Is Now, An Update on Climate Change Science, Impacts, and Response Options for California, CEC-500-2008-0077.

The existing school uses within the boundaries of the LAUSD jurisdictional area currently generate GHG emissions from mobile sources, natural gas and electricity use, water use and generation of wastewater, solid waste, and area sources (e.g., household consumer products, landscaping equipment).

5.7.2 Thresholds of Significance

According to CEQA Guidelines Appendix G a project would normally have a significant effect on the environment if the project would:

- GHG-1 Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment.
- GHG-2 Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

5.7.2.1 SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT

SCAQMD has adopted a significance threshold of 10,000 MTCO_{2e} per year for permitted (stationary) sources of GHG emissions where SCAQMD is the lead agency. To provide guidance to local lead agencies on determining significance for GHG emissions in their CEQA documents, SCAQMD has convened a GHG CEQA Significance Threshold Working Group. Based on the last Working Group meeting (Meeting No. 15) in September 2010, SCAQMD is proposing to adopt a tiered approach for evaluating GHG emissions for development projects where SCAQMD is not the lead agency. The proposed SCAQMD methodology in analyzing GHG impacts is based on a 4-tiered approach. For projects that do not meet the first two tiers, GHG emissions must be quantified and are compared to the AQMD screening threshold (3,000 MTCO_{2e}). If emissions are below the screening threshold then impacts are considered less than significant (i.e., Tier 3). If the emissions exceed the screening threshold then the emissions are compared to the per capita efficiency metric threshold of 4.8 MTCO_{2e} (i.e., Tier 4).

- **Tier 1.** If a project is exempt from CEQA, project-level and cumulative GHG emissions are less than significant.

5. Environmental Analysis GREENHOUSE GAS EMISSIONS

- **Tier 2.** If the project complies with a GHG emissions reduction plan or mitigation program that avoids or substantially reduces GHG emissions in the project's geographic area (i.e., city or county), project-level and cumulative GHG emissions are less than significant.

For projects that are not exempt or where no qualifying GHG reduction plans are directly applicable, SCAQMD requires an assessment of GHG emissions. SCAQMD is proposing a "bright-line" screening-level threshold of 3,000 MTCO_{2e} annually for all land use types or the following land-use-specific thresholds: 1,400 MTCO_{2e} for commercial projects, 3,500 MTCO_{2e} for residential projects, or 3,000 MTCO_{2e} for mixed-use projects. This bright-line threshold is based on a review of the Governor's Office of Planning and Research database of CEQA projects. Based on their review of 711 CEQA projects, 90 percent of CEQA projects would exceed the bright-line thresholds identified above. Therefore, projects that do not exceed the bright-line threshold would have a nominal, and therefore, less than cumulatively considerable impact on GHG emissions:

- **Tier 3.** If GHG emissions are less than the screening-level threshold, project-level and cumulative GHG emissions are less than significant.
- **Tier 4.** If emissions exceed the screening threshold, a more detailed review of the project's GHG emissions is warranted.

SCAQMD has proposed an efficiency target for projects that exceed the screening threshold. The current recommended approach is per capita efficiency targets. SCAQMD is not recommending use of a percent emissions reduction target. Instead, SCAQMD proposes a 2020 efficiency target of 4.8 MTCO_{2e} per year per service population (MTCO_{2e}/Yr/SP) for project-level analyses and 6.6 MTCO_{2e}/Yr/SP for plan level projects (e.g., program-level projects such as general plans). Service population is defined as the sum of the residential and employment populations provided by a project. The per capita efficiency targets are based on the AB 32 GHG reduction target and 2020 GHG emissions inventory prepared for CARB's 2008 Scoping Plan.²³

5.7.3 Environmental Impacts

The applicable thresholds are identified in brackets after the impact statement.

Impact 5.7-1: SUP-related projects are not anticipated to generate GHG emissions that could exceed the thresholds and cumulatively contribute to GHG emissions impacts. [Threshold GHG-1]

GHG emissions related to a project are not confined to a particular air basin, but are dispersed worldwide. Therefore, impacts identified for a project are not project-specific impacts to global warming, but the project's contribution to this cumulative impact. Future school projects associated with the SUP would contribute to GHG

²³ SCAQMD took the 2020 statewide GHG reduction target for land-use-only GHG emissions sectors and divided it by the 2020 statewide employment for the land use sectors to derive a per capita GHG efficiency metric that coincides with the GHG reduction targets of AB 32 for year 2020.

5. Environmental Analysis

GREENHOUSE GAS EMISSIONS

emissions impacts through direct and indirect GHG emissions. The following discusses the potential impacts that could result from the types of project covered under the SUP.

New Construction on New Property and Existing Campus

While the SUP does not include any new school projects built on stand-alone sites, the following analysis is presented as a conservative, worst-case illustration of how projects implemented under the SUP would not exceed this threshold; SUP-related projects are not anticipated to exceed GHG significance thresholds.

Central Los Angeles High School No. 12 is an applicable project in the context of the SUP. This project entailed the construction of a 19-classroom high school facility on a 1.28-acre LAUSD-owned site, adjacent to the existing Miguel Contreras Learning Complex.

Projects under this category would generate direct GHG emissions from new vehicle trips and onsite area sources. Additionally, indirect emissions from offsite energy production required for onsite activities, water use, and waste disposal would also be generated. Overall, it is not anticipated that development of a school under this category would generate GHG emissions that would exceed the SCAQMD significance thresholds. Schools are typically growth accommodating land uses built to serve the local community; therefore, a new school would reduce the overall VMT in the region and thereby reduce mobile-source GHG emissions. In addition, the proposed SUP does not include any New School projects that would be built on stand-alone sites. Table 5.7-4 shows the total emissions generated from Central Region High School No. 12.

5. Environmental Analysis GREENHOUSE GAS EMISSIONS

Table 5.7-4 GHG Emissions of an LAUSD School

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

Sources: High School: LAUSD, Central Los Angeles High School No. 12 Draft EIR, pg. 3B-16, certified July 12, 2011.

Notes: MTCO_{2e}: metric tons of CO₂ equivalent GHG emissions. The sum of the emissions does not equal 100 percent of the total emissions due to rounding.

^a Based on 55,361 building square feet of school facilities, capacity of 500 high school students, and 855 average daily trips generated.

^b As construction emissions are short-term, they are amortized over 30 years per SCAQMD methodology.²⁴

As shown in the table, development of a new school adjacent to an existing school would not exceed the proposed SCAQMD significance thresholds of 3,000 MTons. Future school projects would comply with the Scoping Plan early action statewide measures (e.g., LCFS and RPS) and would also be built to meet the latest Building Energy Efficiency Standards and CALGreen. Compliance with these statewide requirements and measures would reduce GHG emissions.

While individual projects under LAUSD's School Upgrade Program would be less than SCAQMD's bright-line threshold and/or efficiency metric, it is unknown how many individual projects may occur under the SUP. However, the 10-year projection for the overall student population within the LAUSD jurisdiction indicates an overall 2.2 decrease from existing conditions (see Chapter 4 of this EIR). Additionally, the long-range 50-year projection for Los Angeles County also indicates an overall decline compared to the existing student population. As new schools would generally be developed to accommodate growth and the overall student population would be on the decline, it is anticipated that development of new, stand-alone schools or expansion of an existing campus to include a new school component (e.g., addition of an elementary school to an existing middle school campus) would be minimal. The overall operational phase emissions generated by cumulative projects under the SUP would not be cumulatively considerable. Therefore, GHG emissions generated by the combination of the types of projects described in Chapter 4, *Program Description*, are considered less than significant.

Modernization, Repair, Replacement, Upgrade, Remodel, Renovation and Installation

Building improvements are anticipated to result in increased energy efficiency, thereby reducing emissions from energy usage (i.e., natural gas and electricity). Most SUP-related projects involving repair, replacement,

²⁴ South Coast Air Quality Management District. 2010, September 28. Greenhouse Gases (GHG) CEQA Significance Thresholds Working Group Meeting 15. <http://www.aqmd.gov/hb/2008/December/081231a.htm>; <http://www.aqmd.gov/ceqa/handbook/GHG/2010/sept28mtg/sept29.html>

5. Environmental Analysis

GREENHOUSE GAS EMISSIONS

upgrades, remodeling, or renovation would not increase capacity to existing schools. However, some modernization projects may potentially add new capacity to existing schools through the installation of portables (see Chapter 4, Table 4-2 of this EIR). Overall student enrollment in the LAUSD is projected to decline for the next 10 years; therefore, it is anticipated that any new portables would primarily be installed to accommodate the existing enrolled student population. Additionally, if the installation of portables is required to accommodate growth, it is anticipated that emissions would be significantly less than the emissions shown in Table 5.7-4. Therefore, the cumulative contribution to GHG emissions from SUP-related projects under this category would be less than significant.

Impact 5.7-2: The SUP would not conflict with plans adopted for the purpose of reducing GHG emissions. [Threshold GHG-2]

All SUP Projects

This section includes a consistency analysis with applicable plans adopted for the purpose of reducing GHG emissions (CARB's Scoping Plan and SCAG's 2012 Regional Transportation Plan/Sustainable Community Strategy [RTP/SCS]).

CARB Scoping Plan

In accordance with AB 32, CARB developed the 2008 Scoping Plan to outline the state's strategy to achieve 1990 level emissions by year 2020. To estimate the reductions necessary, CARB projected statewide 2020 BAU GHG emissions (i.e., GHG emissions in the absence of statewide emission reduction measures). CARB identified that the state as a whole would be required to reduce GHG emissions by 28.5 percent from year 2020 BAU to achieve the targets of AB 32.²⁵ The revised BAU 2020 forecast shows that the state would have to reduce GHG emissions by 21.6 percent from BAU without Pavley and the 33 percent RPS or 15.7 percent from the adjusted baseline (i.e., with Pavley and 33 percent RPS).²⁶

Since adoption of the 2008 Scoping Plan, state agencies have adopted programs identified in the plan, and the legislature has passed additional legislation to achieve the GHG reduction targets. Statewide strategies to reduce GHG emissions include the LCFS, California Appliance Energy Efficiency regulations, California Building Standards (i.e., CALGreen and the 2013 Building Energy Efficiency Standards), 33 percent RPS, and changes in the corporate average fuel economy standards (e.g., Pavley I and California Advanced Clean Cars [Pavley II]). According to the 2013 update to the Scoping Plan, the state is on track to achieving the 2020 targets of AB 32.²⁷ Future SUP-related projects would comply with these GHG emissions reduction measures. In addition, implementation of the District Standards as outlined in School Design Guide (January 2014) would require construction contractors to reuse, recycle, and salvage nonhazardous materials generated during demolition and/or new construction. Materials recovery would minimize the need to transport new

²⁵ California Air Resources Board. 2008, October. Climate Change Proposed Scoping Plan, a Framework for Change.

²⁶ California Air Resources Board. 2012. Status of Scoping Plan Recommended Measures. http://www.arb.ca.gov/cc/scopingplan/status_of_scoping_plan_measures.pdf.

²⁷ California Air Resources Board. 2014, February 10. Proposed First Update to the Climate Change Scoping: Building on the Framework. http://www.arb.ca.gov/cc/scopingplan/2013_update/discussion_draft.pdf.

5. Environmental Analysis

GREENHOUSE GAS EMISSIONS

materials from farther distances and production of new materials and thereby reduce emissions from mobile sources and energy usage. Therefore, the SUP would not conflict the CARB Scoping Plan.

SCAG's 2012 Regional Transportation Plan/Sustainable Communities Strategy

SCAG's 2012 RTP/SCS was adopted April 4, 2012. It identifies multimodal transportation investments, including bus rapid transit, light rail transit, heavy rail transit, commuter rail, high-speed rail, active transportation strategies (e.g., bike ways and sidewalks), transportation demand management strategies, transportation systems management, highway improvements (interchange improvements, high-occupancy vehicle lanes, high-occupancy toll lanes), arterial improvements, goods movement strategies, aviation and airport ground access improvements, and operations and maintenance to the existing multimodal transportation system. SCAG's RTP/SCS identifies land use strategies that focus new housing and job growth in areas served by high quality transit areas and other opportunity areas, and that would be consistent with a land use development pattern that supports and complements the proposed transportation network, which emphasizes system preservation, active transportation, and transportation demand management measures. The 2012 RTP/SCS incorporates local land use projections and circulation networks from the cities' and counties' general plans. The projected regional development pattern, including location of land uses and residential densities in local general plans, when integrated with the proposed regional transportation network identified in the 2012 RTP/SCS, would reduce per capita vehicular travel-related GHG emissions and achieve the GHG reduction per capita targets for the SCAG region.

Development of new schools associated with the SUP would fill the educational needs of the local communities. Schools that serve the local community would reduce the average travel distance for students and could also promote non-motorized travel (e.g., walking and biking) thereby reducing the overall VMT. A reduction in the overall VMT would reduce GHG emissions from mobile sources. Therefore, the SUP would not conflict with the 2012 RTP/SCS and impacts would be less than significant.

5.7.4 Applicable Regulations and Standard Conditions

State

- CARB Rule 2480 (13 CCR 2480)
- CARB Rule 2485 (13 CCR 2485)
- Executive Order S-3-05: Greenhouse Gas Emission Reduction Targets
- AB 32: California Global Warming Solutions Act
- SB 375: Sustainable Communities Strategies
- AB 1493: Pavley Fuel Efficiency Standards
- Title 20 California Code of Regulations: Appliance Energy Efficiency Standards
- Title 17 California Code of Regulations: Low Carbon Fuel Standard
- AB 1881: California Water Conservation in Landscaping Act of 2006
- SB 1368: Statewide Retail Provider Emissions Performance Standards

5. Environmental Analysis

GREENHOUSE GAS EMISSIONS

- SB 1078: Renewable Portfolio Standards
- Title 24, Part 6, California Code of Regulations: Building and Energy Efficiency Standards
- Title 24, Part 11, California Code of Regulations: Green Building Standards Code

LAUSD Standard Conditions of Approval

- ~~School Design Guide, January 2014 (includes Specification 01340, Construction & Demolition Waste Management, July 7, 2003)~~
- ~~Project Design Features: PDF GHG-1, PDF GHG-2, PDF GHG-3, PDF GHG-4, PDF GHG-5SC-USS-1~~
- SC-GHG-1 through SC-GHG-5:

5.7.5 Level of Significance Before Mitigation

Upon implementation of regulatory requirements and LAUSD Standard Conditions listed above, Impacts 5.7-1 and 5.7.2 would be less than significant.

5.7.6 Mitigation Measures

No mitigation measures are required.

5.7.7 Level of Significance After Mitigation

Impacts would be less than significant.

5. Environmental Analysis GREENHOUSE GAS EMISSIONS

This page intentionally left blank.

5. Environmental Analysis

5.8 HAZARDS AND HAZARDOUS MATERIALS

This section of the EIR evaluates the potential for implementation of the SUP to create a significant impact related to hazards and hazardous materials in the District. This section discusses regulatory framework (plans and policies from several jurisdictional agencies and LAUSD Standard Conditions)~~plans and policies from several jurisdictional agencies and LAUSD standard conditions, guidelines, specifications, practices, policies, and project design features (LAUSD Standards)~~, along with the existing hazards throughout the SUP area including two types of potential risks associated with site-specific new school construction and upgrade projects: 1) risks that construction of new school facilities could pose to onsite workers and the surrounding community, and 2) risks to students, faculty, and other LAUSD staff from on- and offsite hazards and sources of hazardous materials.

TERMINOLOGY

Hazardous materials. Generally refer to hazardous substances that exhibit corrosive, poisonous, flammable, and/or reactive properties and have the potential to harm human health and/or the environment. Hazardous materials are used in products (e.g., household cleaners, industrial solvents, paint, pesticides) and in the manufacturing of products (e.g., electronics, newspapers, plastic products). Hazardous materials can include petroleum, natural gas, synthetic gas, acutely toxic chemicals, and other toxic chemicals that are used in agriculture, commercial, and industrial uses; businesses; hospitals; and households. Accidental releases of hazardous materials have a variety of causes, including highway incidents, warehouse fires, train derailments, shipping accidents, and industrial incidents.

The terms “hazardous materials” as used in this section include all materials defined in the California Health and Safety Code: (H&SC):

A material that, because of its quantity, concentration, or physical or chemical characteristics, poses a significant present or potential hazard to human health and safety or to the environment if released into the workplace or the environment. “Hazardous materials” include, but are not limited to, hazardous substances, hazardous waste, and any material that a handler or the unified program agency has a reasonable basis for believing that it would be injurious to the health and safety of persons or harmful to the environment if released into the workplace or the environment.¹

The term includes chemicals regulated as hazardous materials, wastes, or substances by the US Department of Transportation (DOT), the US Environmental Protection Agency (EPA), the Department of Toxic Substances Control (DTSC), the California Governor’s Office of Emergency Services, and other agencies. “Hazardous waste” is any hazardous material that has been discarded, except those materials specifically excluded by regulation.² Hazardous materials that have been intentionally disposed of or inadvertently released fall within the definition of “discarded” materials and can result in the creation of hazardous waste.

¹ California Health and Safety Code, Division 20, Chapter 6.95, Article 1, Section 25501(o).

² California Health and Safety Code, Division 20, Chapter 6.5, Article 2, Section 25124.

5. Environmental Analysis

HAZARDS AND HAZARDOUS MATERIALS

Hazardous wastes are broadly characterized by their ignitability, toxicity, corrosivity, reactivity, radioactivity, or bioactivity. Federal and state hazardous waste definitions are similar, but distinct enough that separate classifications are in place for federal Resource Conservation and Recovery Act (RCRA) hazardous wastes and state non-RCRA hazardous wastes. Hazardous wastes require special handling and disposal because of their potential to impact public health and the environment. Some materials are designated “acutely” or “extremely” hazardous under relevant statutes and regulations.

School Site. The SUP is not anticipated to include the acquisition of new sites for the construction of “stand alone” schools. However, some projects developed under the SUP may incorporate the acquisition of property, thus expanding an existing campus. For this section, the term “school site” relates to the latter rather than the former definition.

5.8.1 Environmental Setting

5.8.1.1 REGULATORY FRAMEWORK

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. 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 date when a proposed site-specific school project undergoes review. Therefore, this section provides a general discussion of the most important plans and policies that apply to SUP-related projects. 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 directly apply to the SUP or site-specific projects implemented under the SUP, they are included to assist in identifying potential impacts and significance thresholds. Applicable LAUSD Standards Conditions of Approval are also listed. See *Applicable Regulations and Standard Conditions* at end of this chapter for those that require District compliance.

Federal

United States Code, Title 42, Sections 6901 et seq.

The **Resource Conservation and Recovery Act** of 1976 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.

5. Environmental Analysis HAZARDS AND HAZARDOUS MATERIALS

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.

United States Code, Title 42, Sections 9601 et seq.

The federal **Comprehensive Environmental Response, Compensation, and Liability Act** (CERCLA) of 1980, commonly known as “Superfund,” 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. 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.

United States Code, Title 42, Sections 11001 et seq

The **Emergency Planning and Community Right-to-Know Act** (EPCRA) of 1986, 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

5. Environmental Analysis

HAZARDS AND HAZARDOUS MATERIALS

in California by the California Emergency Management Agency (CalEMA), a SERC, 6 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 fire fighters, health officials, government and media representatives, community groups, industrial facilities, and emergency managers ensures that all necessary elements of the planning process are represented.

United States 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 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 aforementioned 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 line.
 - 150 feet for 220–230 kV line.
 - 350 feet for 500–550 kV line.

5. Environmental Analysis HAZARDS AND HAZARDOUS MATERIALS

- **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 (q).** The district shall consider environmental factors of light, wind, noise, aesthetics, and air pollution in its site selection process.
- **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, have 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

5. Environmental Analysis

HAZARDS AND HAZARDOUS MATERIALS

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 Environmental Site Assessment (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~~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~~District may proceed with the acquisition or construction project without further environmental investigation.
- **Preliminary Endangerment Assessment (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.

5. Environmental Analysis HAZARDS AND HAZARDOUS MATERIALS

- **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.

5. Environmental Analysis

HAZARDS AND HAZARDOUS MATERIALS

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, if a project is eligible for a statutory or categorical exemption under CEQA, Sections 17213.1 and 17213.2 requirements do not apply.⁴ ~~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.⁵ 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 School Facilities Planning Division (SFPD), State Allocation Board (SAB), Office of Public School Construction (OPSC), Division of the State Architect (DSA), and DTSC.⁶ The roles and responsibilities of these agencies with respect to the SFP are summarized below.

³ California Department of Transportation California Code of Regulations Title 21, Division 2.5, Chapter 2.1 School Site Evaluation Criteria, March 5, 2003.

⁴ Education Code Section 17268(c).

⁵ Brunner, E.J., Financing School Facilities in California, 2007.

⁶ Office of Public School Construction, School Facility Program Handbook, June 2007.

5. Environmental Analysis HAZARDS AND HAZARDOUS MATERIALS

Regulatory Agencies

United States Environmental Protection Agency

The United States Environmental Protection Agency (EPA) is the primary federal agency that regulates hazardous materials and waste. In general, the EPA works to develop and enforce regulations that implement environmental laws enacted by Congress. The agency is responsible for researching and setting national standards for a variety of environmental programs and delegates to states and Native American tribes the responsibility for issuing permits and for monitoring and enforcing compliance. EPA programs promote handling hazardous wastes safely, cleaning up contaminated land, and reducing waste volumes through such strategies as recycling. California falls under the jurisdiction of EPA Region 9. Under the authority of RCRA and in cooperation with state and tribal partners, the EPA Region 9 ~~Waste Management Land and~~ Superfund Divisions manage programs for site environmental assessment and cleanup, hazardous and solid waste management, and underground storage tanks.

California Environmental Protection Agency

The California Environmental Protection Agency (Cal/EPA) was created in 1991 by Governor Executive Order W-5-91. Several state regulatory boards, departments, and offices were placed under the Cal/EPA umbrella to create a cabinet-level voice for the protection of human health and the environment and to assure the coordinated deployment of state resources. Among those responsible for hazardous materials and waste management are the DTSC, Department of Pesticide Regulation, ~~RWQCB?~~ and Office of Environmental Health Hazard Assessment. Cal/EPA also oversees the unified hazardous waste and hazardous materials management regulatory program (Unified Program), which consolidates, coordinates, and makes consistent the following six programs:

- Hazardous Materials Release Response Plans and Inventories (Business Plans)
- Underground Storage Tank Program
- Aboveground Petroleum Storage Tank Act
- Hazardous Waste Generator and Onsite Hazardous Waste Treatment Programs
- California Uniform Fire Code: Hazardous Material Management Plans and Inventory Statements
- California Accidental Release Prevention (CalARP) Program.

Department of Toxic Substances Control

The Department of Toxic Substances Control (DTSC) is a division of Cal/EPA and is authorized to carry out the federal RCRA hazardous waste program in California to protect people from exposure to hazardous wastes. The department regulates hazardous waste, cleans up existing contamination, and looks for ways to control and reduce the hazardous waste produced in California, primarily under the authority of RCRA and in accordance with the California Hazardous Waste Control Law⁷ ~~(California H&SC Division 20, Chapter 6.5)~~

⁷ California Hazardous Waste Control Law, Division 20, Chapter 6.5.

5. Environmental Analysis

HAZARDS AND HAZARDOUS MATERIALS

and the Hazardous Waste Control Regulations,⁸ (~~22 CCR Divisions 4 and 4.5~~). Permitting, inspection, compliance, and corrective action programs ensure that people who manage hazardous waste follow state and federal requirements and other laws that affect hazardous waste specific to handling, storage, transportation, disposal, treatment, reduction, cleanup, and emergency planning.

The role of the DTSC in school construction begins with the SFPD site approval process. The DTSC assists school districts with the assessment of any possible contamination and, if necessary, with the development and implementation of a mitigation plan. The DTSC established a dedicated Schools Division in 2000 to oversee environmental assessment of new school sites. DTSC's role is limited to projects with state funding. DTSC oversight is not required where a state-funded project is statutorily or categorically exempt from CEQA. The school site evaluation process includes the following steps:

- **Phase I Environmental Site Assessment (ESA).** Prior to site acquisition, or if the District owns or leases a site, prior to construction, a preliminary assessment of a property must be undertaken to determine whether there has been or may have been a release of a hazardous material, or whether a naturally occurring hazardous material such as methane or asbestos is present. A Phase I ESA must meet the most current requirements adopted by the American Society for Testing and Materials (ASTM) for the “Standard Practice for Environmental Site Assessments.” If the Phase I ESA identifies no potential contamination, the school district will receive a “No Action” determination letter from DTSC, and the process is complete (~~CEC Section 17213.1(a)(2)~~).⁹ When a Phase I ESA reveals potential contamination, a Preliminary Environmental Assessment may be required to evaluate the threat to human health or the environment.
- **Preliminary Environmental Assessment (PEA).** A PEA is required when there is potential contamination on the school site. This can be determined through a Phase I ESA (see above) or districts may elect to proceed directly to a PEA based on site knowledge.¹⁰ (~~CEC Section 17213.1(a)(4)(B)~~). The assessment includes collection of environmental samples and evaluation of potential health risks. School districts enter into an Environmental Oversight Agreement with DTSC, then contract with a qualified environmental consultant to prepare an assessment according to DTSC guidelines. The assessment includes preparation of a work plan, collection and analysis of environmental samples, and preparation of a PEA Report (~~CEC Sections 17210(b) and 17213.1(a)(4)(B)~~).¹¹ The report includes results of environmental sampling and a health risk assessment conducted according to DTSC guidelines,¹² (~~CEC Section 17213.1(a)(4)(B)~~). School districts must make the report available for public review and comment before DTSC's final determination.¹³ (~~CEC Section 17213.1(a)(6)~~). DTSC is required to approve or disapprove the PEA Report within 30 days of close of the public review period¹⁴ (~~CEC Section 17213.1(a)(6)(A)~~) or within 30 days of the school district's approval of the Environmental Impact

⁸ Hazardous Waste Control Regulations, 22 CCR Divisions 4 and 4.5.

⁹ CEC Section 17213.1(a)(2).

¹⁰ CEC Section 17213.1(a)(4)(B).

¹¹ CEC Sections 17210(b) and 17213.1(a)(4)(B).

¹² CEC Section 17213.1(a)(4)(B).

¹³ CEC Section 17213.1(a)(6).

¹⁴ CEC Section 17213.1(a)(6)(A).

5. Environmental Analysis HAZARDS AND HAZARDOUS MATERIALS

Report for the school.¹⁵ ~~(CEC Section 17213.1(a)(6)(B))~~. If the assessment identifies no significant health or environmental risks, the school district will receive a “No Further Action” determination letter from DTSC¹⁶ ~~(CEC Section 17213.1(a)(9))~~ and the process is complete. If the assessment identifies potential contamination, further action will be required. In general, PEAs are conducted in accordance with the DTSC’s “Preliminary Endangerment Assessment Guidance Manual.”¹⁷ Supplemental Site Investigations (SSIs) may be required to further evaluate areas of contamination identified during the PEA or areas that were inaccessible during the initial investigation.

- **Response Action.** If the PEA identifies significant contamination, school districts may elect to drop the proposed school site from consideration or clean up the contamination under a DTSC Voluntary Cleanup Agreement (VCA) or School Cleanup Agreement (SCA). An SCA is required for school districts planning to obtain final site or plan approval and full funding before completion of required response actions. Consistent with response actions conducted for other contaminated sites, DTSC follows Health and Safety Code ~~(H&S Code)~~ requirements for all response actions,¹⁸ ~~(CEC Section 17210.1(a)(1) and (2) and Section 17213.2(a))~~. DTSC is required to provide opportunities for public comment on the Removal Action Workplan or Remedial Action Plan before approval of the final document.¹⁹ ~~(H&S Code Division 20, Chapter 6.8, Section 25356.1(e) and (h))~~. When all necessary cleanup activities are complete, DTSC will certify that “No Further Action” is needed and certify the site as safe for school construction or occupancy.

The DTSC has issued numerous advisories and guidance specific to the investigation and cleanup of school sites. School projects conducted under DTSC oversight are required to follow the agency guidance, but school districts and others also may refer to the guidance documents when conducting self-directed environmental investigations and remedial activities. Current DTSC technical guidance commonly used for new school projects include:

- Preliminary Endangerment Assessment Guidance Manual, January 1994 (revised October 2013)
- Information Advisory: Clean Imported Fill Material, October 2001
- Interim Guidance for Sampling Agricultural Fields for School Sites, August 26, 2002
- Fact Sheet: PCBs in Schools: Voluntary Lighting Retrofits Can Address Hidden Dangers and Liabilities, February 2003
- Interim Guidance: Naturally Occurring Asbestos (NOA) at School Sites, September 24, 2004

¹⁵ CEC Section 17213.1(a)(6)(B).

¹⁶ CEC Section 17213.1(a)(9).

¹⁷ Department of Toxic Substances Control, January 1994 (Interim Final, revised October 2013).

¹⁸ CEC Section 17210.1(a)(1) and (2) and Section 17213.2(a).

¹⁹ Health and Safety Code, Division 20, Chapter 6.8, Section 25356.1(e) and (h).

5. Environmental Analysis

HAZARDS AND HAZARDOUS MATERIALS

- Advisory on Methane Assessment and Common Remedies at School Sites, April 26, 2005
- Interim Guidance: Evaluation of School Sites with Potential Soil Contamination as a Result of Lead from Lead-Based Paint, Organochlorine Pesticides from Termiticides, and Polychlorinated Biphenyls from Electrical Transformers, June 9, 2006
- Arsenic Strategies: Determination of Arsenic Remediation Development of Arsenic Cleanup Goals for Proposed and Existing School Sites, March 21, 2007
- ~~School Environmental Assessment Manual (SEAM), Interim Guidance Document for Environmental Assessments and Investigations of School Sites, August 2008 (Draft)~~
- Evaluation of Biogenic Methane, March 28, 2012
- Advisory: Active Soil Gas Investigations, Joint Document with Los Angeles and San Francisco Regional Water Quality Control Boards, April 2012.

Certified Unified Program Agency

A CUPA is a local agency that has been certified by Cal/EPA to implement the local Unified Program. The CUPA can be a county, city, or joint powers authority. A participating agency is a local agency that has been designated by the local CUPA to administer one or more Unified Programs within their jurisdiction on behalf of the CUPA. A designated agency is a local agency that has not been certified by Cal/EPA to become a CUPA, but is the responsible local agency that would implement the six Unified Programs²⁰ until they are certified.

Currently, there are 83 CUPAs in California. Three are within the LAUSD boundaries: the Los Angeles Fire Department within the City of Los Angeles; the City of Vernon Health & Environmental Control Department in the City of Vernon; and the Los Angeles County Fire Department in the remainder of the District.²¹

CDE School Facilities Planning Division

The role of the SFPD is to review and approve school district sites and construction plans. Prior to approving a site for school purposes, the SFPD reviews many factors, including environmental hazards, proximity to airports, freeways, and power transmission lines. In most cases, the district must have completed the process of identifying the site and must have SFPD approval for the site prior to applying for site acquisition funding. As previously discussed, the CDE is given the authority in law to develop standards for

²⁰ The six Unified Programs include: Hazardous Materials Disclosure and Business Plan, Underground Storage Tank Program, Aboveground Storage Tank Spill Prevention Control and Countermeasure Plan (SPCC), Hazardous Waste Generator Program, California Accidental Release Prevention Program (CalARP), and On-site Hazardous Waste Treatment (Tiered Permitting) Program

²¹ California Environmental Protection Agency (Cal/EPA). 2014, January 31. Unified Program Regulator Directory. <http://cersapps.calepa.ca.gov/Public/Directory/>.

5. Environmental Analysis HAZARDS AND HAZARDOUS MATERIALS

school site acquisition related to the educational merit and the health and safety issues of the site. The CDE uses these standards to review a site and determine if it is an appropriate location for a school facility. The “School Site Selection and Approval Guide”²² addresses the site selection standards in detail.

State Allocation Board

The State Allocation Board (SAB) is responsible for determining the allocation of state resources, including proceeds from General Obligation Bonds and other designated state funds used for new construction and modernization of public school facilities. The SAB meets once a month to review and approve applications for eligibility and funding, act on appeals, and adopt policies and regulations as they pertain to the programs under its purview.

Office of Public School Construction

The Office of Public School Construction (OPSC) serves the more than 1,000 public K–12 school districts in California. As staff to the SAB, the OPSC is responsible for allocating state funding for eligible new construction and modernization projects for California public school children. The OPSC is responsible for verifying that all applicant school districts meet specific criteria based on the type of eligibility or funding that is being requested and to assist school districts with the application process. The OPSC ensures that funds are allocated properly and in accordance with the law and decisions made by the SAB.

Division of State Architect

The primary role of the Division of State Architect (DSA) in the school construction process is to review plans and specifications to ensure that they comply with California’s building codes, with an emphasis on structural and seismic safety. The DSA reviews working drawings submitted by the district to ensure that the proposed structures meet codes and requirements for construction, fire and life safety, and universal design compliance. DSA approval of all plans and specifications is required prior to a construction contract being signed for new construction, modernization, or alteration of any state-funded school building.

New School Construction and Modernization Approval Process

Most projects implemented under the SUP are anticipated to be minor school additions²³ or renovation upgrades that are eligible for a statutory or categorical exemption under CEQA guidelines, Article 18 or Article 19. In such a case, per Education Code Section 17268(c), the project is not subject to DTSC oversight and requirements of Sections 17213.1 and 17213.2. In addition, according to the CDE, all modernization projects subject to state funding under the modernization budget (i.e., Form SFPD 4.08), including

²² California Department of Education, 2004. <http://www.cde.ca.gov/ls/fa/sf/schoolsiteguide.asp>.

²³ LAUSD uses the Class 14 CEQA Exemption criteria to determine what qualifies as a minor addition: Class 14 consists of minor additions to existing schools within existing school grounds where the addition does not increase original student capacity by more than twenty-five (25) percent or ten (10) classrooms, whichever is less. The addition of portable classrooms is included in this exemption. LAUSD also interprets that additions other than classrooms qualify for this exemption and we may apply multiple exemptions...but the key as it pertains to DTSC is Class 14 must be listed as one of the exemptions applied.

5. Environmental Analysis

HAZARDS AND HAZARDOUS MATERIALS

replacement area and/or new area required by the Americans with Disabilities Act or the DSA handicapped access requirements, do not require a Phase I ESA or DTSC determination for SFPD final plan approval.²⁴

In circumstances where a project does not qualify as a minor addition to schools and does not meet the criteria for a CEQA exemption, the following process would apply. The SFP provides state funding assistance for two major types of school construction projects: new construction and modernization. The process for accessing state funding is divided into two steps: an application for eligibility and an application for funding. In order to receive funding for an eligible project, the district must file applications first with the SFPD for project approval, and then with the OPSC and SAB for funding approval. With respect to the evaluation of hazards and hazardous materials, districts using state funding for site acquisition and new construction or expansion of schools on existing school sites must submit the following documents with their applications:²⁵

- Form SFPD 4.02, “School Site Report,” which includes sections for describing DTSC site investigation and cleanup requirements, as well as potential site hazards related to its proximity to airports/heliports, major roadways, railroads, hazardous waste disposal sites, pipelines carrying hazardous substances, high voltage power lines, hazardous air emissions, and earthquake faults.
- Form SFPD 4.03, “School Site Certification,” which requires the district to certify that the proposed site is free, or will be free prior to occupancy, from hazards that could be considered harmful to student and staff health and safety. It also requires the district to certify that it has (or will) comply with all applicable laws and policies associated with the acquisition of the school site, including commitments for DTSC-required activities and hazard evaluations related to CCR Title 5 site selection standards.
- Geological and other environmental hazard reports, including, but not limited to, high-pressure pipelines, liquid storage tanks, railroads, airports, electrical transmission lines, flooding, dam inundation, seismic faulting, and liquefaction.
- One or more of the following DTSC documents, as appropriate:
 - DTSC-approved Phase I ESA and PEA Executive Summary.
 - DTSC “final” determination letter approving the Phase I ESA and/or PEA.
 - If a response action was required, the DTSC “no further action” letter, or the certified completion of the response action.
 - Form SFPD 4.14 committing the district to complete a Phase I assessment addendum, PEA, or response action for lead-based paint, polychlorinated biphenyls, and/or organochlorine pesticides, if requesting final CDE approval prior to completing DTSC requirements.

²⁴ California Department of Education, SFPD Advisory 00-01: Site and Plan Approval Procedures Related to Hazardous Materials Required by Assembly Bill (AB) 387/Senate Bill 162, January 18, 2000.

²⁵ School Facilities Planning Division Form SFPD 4.01 – School Site Approval Procedures.

5. Environmental Analysis HAZARDS AND HAZARDOUS MATERIALS

- Form SFPD 4.15 committing the district to complete a response action, if requesting final CDE approval prior to completing DTSC requirements.
- If the proposed school site is within two nautical miles of an existing or potential airport runway, a final determination letter from the Caltrans, Division of Aeronautics.
- Other studies, as applicable, to evaluate the unique characteristics and environment of the proposed school site, including the evaluation of hazards associated with railroads, pipelines, electric transmission lines and flooding.
- Form SFPD 4.07 for new school construction projects that will use state funding. SFPD 4.07 requires the district to certify compliance with DTSC requirements and CCR Title 5 Section 14010 standards regarding the evaluation of potential site hazards.
- Form SFPD 4.08 for school modernization projects that will use state funding. SFPD 4.08 requires the district to certify compliance with CCR Title 5, Section 14010, standards regarding the evaluation of potential site hazards. Per CDE policy, DTSC oversight and approval are not required for districts using state funding for school modernization projects. Additionally, DTSC oversight is not required where state-funded project is CEQA exempt.

The following statutory and regulatory requirements relate to new school construction or modification projects in instances when a school district is not using state funding (also referred to as “locally funded” projects):

- Per Education Code Section 17210.1, a district is not subject to DTSC oversight and requirements of Sections 17213.1 and 17213.2 unless it is using state funding. However, such school sites may voluntarily participate in the DTSC’s school environmental review process.
- New school construction projects that do not use state funding are not required to be approved by CDE. However, locally funded projects are still required to comply with the property evaluation and public noticing requirements of CCR Title 5, Section 14012. CCR Title 5, Section 14012(a), requires that districts using local funding evaluate potential hazards and hazardous materials at proposed school sites in accordance with standards in CCR Title 5, Sections 14010 and 14011(e) through (l).

Per Education Code Section 17268(a), even if a district is not using state funding, it must still evaluate a proposed school site in accordance with Education Code Section 17213 (which includes a subset of the CCR Title 5 standards) prior to approving the construction of a new school building.

LAUSD

Standard Conditions of Approval

LAUSD Standards

5. Environmental Analysis

HAZARDS AND HAZARDOUS MATERIALS

This section includes the hazard related standard conditions ~~and project design features (PDF)~~ that ~~are~~ will be included as part of each SUP-related project, as appropriate. ~~Because of the significant number of LAUSD hazard standard conditions for hazards and hazardous materials~~ and the complexity and overlap between procedures this section is formatted with full details instead of in a table.

The LAUSD Office of Environmental Health and Safety (OEHS) is responsible for the development and implementation of programs to ensure a safe and healthy environment for the students and employees of the District. OEHS administers a range of health and safety programs under two broad categories:

- **Safety and Industrial Hygiene.** OEHS provides support related to occupational safety and health regulatory program compliance, loss control, accident management, workers' compensation cost reduction, industrial hygiene, liability loss control, ergonomic support, safety and industrial hygiene training, traffic/pedestrian safety, asbestos compliance oversight, lead in drinking water compliance, chemical product evaluation, regulatory agency support and citation management, and equipment approval. OEHS staff works on District-wide design standards and policies, conducts comprehensive analyses of all major facilities projects, and approves occupancy for new construction and significant site modification projects.

In addition to traditional safety and industrial hygiene program management, OEHS staff manages the District's Emergency Operations Centers (EOCs), responds to District emergency response situations (e.g., hazardous materials, fires, chemical spills, sewer overflows, vandalism), provides emergency response training, coordinates the District emergency response equipment inventory, and responds to catastrophic emergencies. In cooperation with School Operations, OEHS coordinates with local, state, and federal emergency management agencies, communicates with District executive management during large-scale emergencies, and conducts postevent analyses of District response activities.

- **Environmental Programs.** OEHS provides support related to CEQA compliance, new construction site assessment and remediation, development and maintenance of site environmental surveillance systems (i.e., methane systems), hazardous/universal waste management, solid waste management, recycling programs, District environmental design standards, stormwater compliance, environmental auditing and program compliance, permitting, coordination between environmental regulatory agencies, environmental training programs, and the development and implementation of District-wide environmental compliance and sustainability programs.

OEHS is a nationally recognized leader in coordinating District-wide activities related to environmental site assessment and remediation. OEHS staff works with contractors, Facilities Services Division (FSD), and other District staff to coordinate the required provisions of CEQA for new school sites and existing school site modifications, which involves the development of appropriate CEQA documents up to and including Environmental Impact Reports. OEHS staff oversees (or, when necessary, works with the DTSC to oversee) completion of Phase I ESAs, development of PEAs, and development and management required site remedial action plans. In addition to new school sites, OEHS staff reviews and supports existing FSD projects and monitors the ongoing land use surrounding more than 1,000 schools and other sites.

5. Environmental Analysis HAZARDS AND HAZARDOUS MATERIALS

OEHS has developed numerous practices, procedures, and standard conditions related to hazards and hazardous materials, including the following:

- **Site Hazards.** Procedures are in place for OEHS to evaluate the presence of potentially toxic or hazardous conditions on or in the vicinity of a proposed or existing District facility. If necessary, a site screening is conducted to determine the proximity of the project site to any rail lines, pipelines, oil fields, methane zones, methane buffer zones, freeways, landfills, industrial facilities, and high voltage power lines. The findings are documented in the OEHS Site Environmental Review and may involve preparation of supporting technical studies such as an air quality health risk assessment, pipeline safety hazard assessment, rail safety study, electromagnetic field exposure management plan, geohazard report, tank safety study, or methane assessment. OEHS is also actively involved in identifying potential environmental hazards in proximity to schools pursuant to the LAUSD's Safe School Plans (SSPs) program. Finally, OEHS has procedures in place to identify and evaluate existing high risk facilities and new offsite projects that may impact a school within one-quarter mile. Applicable LAUSD guidance includes:
 - LAUSD-OEHS Safety Alert No. 03-02: Procedures – Responding to Toxic Air Emissions, February 2003
 - LAUSD Board Resolution: Siting of New Schools Near Industrial Facilities, February 22, 2005
 - LAUSD-OEHS Memorandum: Industrial Facilities in Proximity to Schools, MEM-1611, March 4, 2005
 - LAUSD-OEHS User Manual Pipeline Safety Hazard Assessment, October 2008
 - LAUSD-OEHS Reference Guide: Environmental Hazards in Proximity to Schools, REF-5892.0, October 8, 2012
 - LAUSD-OEHS Procedures: Review of Non-District Projects to Determine Impact on Schools, undated draft.
- **Site Investigation and Remediation.** OEHS conducts reviews of proposed projects at District facilities that have the potential to impact public health, safety, or the environment. To ensure the health and safety of students and staff, OEHS review of the following types of projects is required prior to construction or implementation, regardless of funding source:²⁶
 - Proposed new school site
 - Proposed construction of new school buildings or structures
 - Expansion, major repair, or modernization of existing school facilities

²⁶ LAUSD Office of Environmental Health and Safety. OEHS Review of Proposed School Projects, December 1, 2009.

5. Environmental Analysis

HAZARDS AND HAZARDOUS MATERIALS

- Proposed placement of bungalows, portable buildings, J-buildings, or other temporary structures at existing school facilities
 - Change in use or occupancy of existing facilities
 - Proposed purchase, lease, or use of non-District property for District purposes
 - Removal or installation of tanks, boilers, clarifiers, storm drains, hydraulic hoists, hazardous waste drains, elevators, or other apparatus containing hazardous materials
 - Propose grading, trenching, soil excavation; demolition, repair, and/or resurfacing of paved areas
 - Proposed installation of, or conversion to, dual-plumbing and/or recycled water systems.
- The site assessment process varies depending on the nature of each proposed project and current site conditions. Elements may include: 1) Preliminary Screening only, with a determination of no or minimal potential environmental impacts; 2) Phase I ESA, including environmental database and historical records searches, and preparation of an environmental checklist, to identify potential onsite and offsite sources of contamination; 3) Phase II/PEA/SSI to investigate for the presence of hazardous materials; and 4) Response Action if hazardous materials are identified that exceed acceptable health or environmental risk levels. During construction, any soil that is imported or exported must be chemically tested in accordance with specific written procedures. Furthermore, work must be stopped immediately and OEHS notified if subsurface features such as buried debris, tanks, seepage pits, or stained/odiferous soils are encountered during construction. LAUSD guidelines applicable to the performance of these tasks include:
- LAUSD-OEHS Phase I Environmental Site Assessment: Standard Scope of Work, June 2007
 - LAUSD-OEHS Review of Proposed School Projects, December 1, 2009
 - LAUSD Section 01 4524 – Environmental Import/Export Materials Testing, October 1, 2011
 - LAUSD-OEHS Reference Guide: Procedures for Environmental Review of Proposed Projects, REF-5314.1, March 7, 2012.
- **Hazardous Materials.** OEHS has programs and procedures in place to ensure that hazardous materials are handled safely throughout the District. OEHS approves and maintains an inventory of all chemical products to be used by the District.²⁷ It also reviews Material Safety Data Sheets before products are released for use and encourages the substitution of chemical projects with less toxic products whenever possible. It is responsible for ensuring that school campuses and Maintenance and Operation facilities meeting regulatory thresholds for the storage of hazardous materials (i.e., 55 gallons of liquid, 200 cubic feet of gas, or 500 pounds of solid) have filed a Hazardous Materials Business Plan with the local CUPA that includes chemical inventories and an emergency response plan. Other programs are

²⁷ LAUSD OEHS Safety Alert No. 05-03, Approval of Chemical Products for District Use, April 21, 2006.

5. Environmental Analysis HAZARDS AND HAZARDOUS MATERIALS

designed to ensure the safe handling, storage, and use of hazardous materials on school campuses and facilities. Applicable LAUSD-OEHS guidance includes:

- LAUSD Section 13614 – Abatement of Hazardous Materials, July 7, 2003
 - LAUSD Section 13280 – Asbestos Abatement and Asbestos Related Disturbance, November 21, 2003
 - LAUSD-OEHS School Laboratory Chemical Hygiene & Safety Plan, January 2005
 - LAUSD-OEHS Safety Alert No. 05-03: Approval of Chemical Products for District Use, April 21, 2006
 - LAUSD Section 13282 – Lead Abatement and Lead Related Construction Work, March 15, 2007
 - LAUSD-OEHS Safe School Inspection Guidebook, June 2013
 - LAUSD-OEHS Hazard Communication Plan – Your Right to Know, November 2013
 - LAUSD Facilities Services Division, Facilities School Maintenance and Operations Repair & Construction Safety Standards, February 28, 2013
 - LAUSD-OEHS Reference Guide: Daily Flushing Requirements for Drinking Fountains and Faucets, REF-3930.4, August 26, 2013.
- **Hazardous Waste.** OEHS manages the District’s hazardous waste program, which involves waste stream analysis and classification, packaging waste, manifesting waste, transportation, storage, disposal, reporting, and recordkeeping. OEHS also manages the District’s hazardous waste warehouse, waste yards, hazardous waste contractors, and conduct training and audits. Applicable LAUSD guidance includes:
- LAUSD-OEHS Safety Alert No. 03-11: Procedures – Disposal of Electronic Devices, April 29, 2005
 - LAUSD-OEHS Hazardous Waste Management Procedures for Maintenance and Operations and Garages, March 22, 2007
 - LAUSD-OEHS Reference Guide: Disposal Procedures for Hazardous Waste and Universal Waste, REF-4149.0, February 26, 2008.

In December 2011, LAUSD awarded a District-wide rubbish collection and recycling services contract to Republic Services, Inc. (Republic). Republic provides support to the District in an effort to divert more of its waste stream from landfills by launching a renewed effort to increase recycling throughout the District. Republic’s Recycling Outreach Team are visiting schools and other District facilities to discuss their current

5. Environmental Analysis

HAZARDS AND HAZARDOUS MATERIALS

rubbish service and the opportunity to increase recycling in the classrooms, staff offices, cafeterias, operations facilities and local District offices.²⁸

Project sites involving substantial ground disturbance will be reviewed by OEHS. At a minimum, the project site will be evaluated to the standards described in: Phase I Environmental Site Assessment Protocol, E 1527-13, Standard Practice for Environmental Assessments: Phase I Environmental Site Assessment Process.

For site acquisition: Title 5 compliance. Comply with all siting and environmental impact study requirements of the School Facilities Planning Division as defined in Title 5, Division 1, Chapter 13 of the California Code of Regulations, including:

- DTSC site review for hazardous agents, including industrial, agricultural, and naturally occurring pollutants such as asbestos and heavy metals.
- The air pollution control district or air quality management district having jurisdiction in the area must identify nearby facilities which might reasonably be anticipated to emit hazardous air emissions, or to handle hazardous or acutely hazardous materials, substances, or waste and determine that they will not adversely affect student, staff, or teacher health.
- All other siting requirements, including separation from power-line easements, railroad tracks, hazardous pipelines, adverse levels of traffic noise, and avoiding construction on active earthquake faults or fault traces.
- All new school sites receiving state funding are required by law to follow the Title 5 requirements. Privately funded schools must also engage the SFPD and DTSC to validate that their site complies with the Title 5 and the Education Code, as outlined above, for investigating, assessing and remediating hazard substance releases.

5.8.1.2 HAZARDOUS MATERIAL RELEASE SITES

California Government Code Section 65962.5 requires Cal/EPA to compile, maintain, and update specified lists of hazardous material release sites. CEQA²⁹ (~~PRC Section 21092.6~~) requires a lead agency to consult the lists compiled pursuant to Government Code Section 65962.5 to determine whether the lead agency's project and any project alternatives are identified on any of the lists. California Education Code Section 17213(a)(2) requires a school district to determine that a property to be purchased or built upon is not a hazardous substance release site identified by the DTSC in a current list adopted pursuant to Section 25356 of the Health and Safety Code for removal or remedial action.

²⁸ For more information regarding the recycling program, refer to Memorandum MEM-5696.0, "Update to New Rubbish and Recycling Services Program and LAUSD District-Wide Expanded Recycling Program": <http://lausd-oehs.org/docs/Memorandums/MEM-5696.pdf>.

²⁹ PRC Section 21092.6.

5. Environmental Analysis HAZARDS AND HAZARDOUS MATERIALS

The required lists of hazardous material release sites are commonly referred to as the “Cortese List” after the legislator who authored the legislation. Because the statute was enacted over 20 years ago, some of the provisions refer to agency activities that were conducted many years ago and are no longer being implemented, and in some cases, the information to be included in the Cortese List does not exist. Those requesting a copy of the Cortese List are now referred directly to the appropriate information resources on websites hosted by the boards or departments referenced in the statute, including DTSC’s online EnviroStor database and the State Water Resources Control Board’s (SWRCB) online GeoTracker database. These two databases include hazardous material release sites, along with other categories of sites or facilities specific to each agency’s jurisdiction.

Federal, state, local, and proprietary databases for hazardous sites are routinely researched during performance of a Phase I ESA to determine if a proposed project site is listed in the database, or whether hazardous sites are present within prescribed distances from the project site. Several private companies provide comprehensive database services that comply with ASTM standards to make such research time efficient and cost-effective. Preparation of a Phase I ESA will ensure that the regulatory obligations for the identification of hazardous material release sites are met for a given project. In instances where a Phase I ESA is not required, the LAUSD may research the EnviroStor and GeoTracker websites or obtain a database search report to assess environmental conditions in the vicinity of the project as part of its Preliminary Screening evaluation. Regulatory databases that may be consulted include the following:

- **EPA NPL (National Priorities List).** Lists all sites under the EPA’s Superfund program, which was established to fund cleanup of contaminated sites that pose risk to human health and the environment.
- **EPA CERCLIS and Archived Sites.** Comprehensive Environmental Response, Compensation, and Liability Information System. List contains 15,000 sites nationally identified as hazardous sites. This would also involve a review for archived sites that have been removed from CERCLIS due to No Further Remedial Action Planned (NFRAP) status.
- **EPA RCRIS (RCRAInfo).** Resource Conservation and Recovery Act Information System (RCRIS or RCRAInfo) is a national inventory system about hazardous waste handlers. Generators, transporters, handlers, and disposers of hazardous waste are required to provide information for this database.
- **DTSC Cortese List.** The DTSC maintains the Hazardous Waste and Substances Sites (Cortese) List as a planning document for use by the State and local agencies to comply with the CEQA requirements in providing information about the location of hazardous materials release sites. This list includes the Site Mitigation and Brownfields Reuse Program Database (CalSites).
- **DTSC HazNet.** DTSC uses this database to track hazardous waste shipments.
- **SWRCB LUSTIS.** Leaking Underground Storage Tank Information System. The State Water Resources Control Board (SWRCB) maintains an inventory of USTs and leaking USTs, which tracks unauthorized releases.

5. Environmental Analysis

HAZARDS AND HAZARDOUS MATERIALS

A search of commonly accessed online databases on January 29, 2014, identified the following information potentially relevant to the District's proposed SUP.

EnviroStor

The EnviroStor database, maintained by the DTSC, identifies sites that have known contamination or sites for which there may be reasons to investigate further. The database includes federal Superfund sites (National Priorities List), state response sites, voluntary cleanup sites, school investigation and cleanup sites, corrective action sites, and tiered California permit sites. It also includes sites that are being investigated for suspected but unconfirmed contamination. A search of this database found a number of facilities in the 12 cities completely or mostly served by the District, shown in Table 5.8-1.

5. Environmental Analysis
HAZARDS AND HAZARDOUS MATERIALS

Table 5.8-1 EnviroStor Cleanup Program Sites

Status	Los Angeles	San Fernando	West Hollywood	Bell	Carson	Cudahy	Gardena	Huntington Park	Lomita	Maywood	South Gate	Vernon	TOTAL
School Investigation and School Cleanup Sites													
Certified or No Further Action	105	3	0	5	2	2	1	6	0	1	7	0	132
Active, Inactive, or Referred to Other Agency	85	0	0	0	0	1	0	1	0	2	3	0	92
Subtotal	190	3	0	5	2	3	1	7	0	3	10	0	224
Evaluation, Border Zone/Hazardous Waste Evaluation, or Military Evaluation Sites													
Certified, No Further Action, or Delisted	19	0	0	0	0	0	1	1	0	0	0	3	24
Active, Backlog, Inactive, or Referred to Other Agency	136	5	2	3	11	2	16	4	0	1	10	13	203
Subtotal	155	5	2	3	11	2	17	5	0	1	10	16	227
Federal Superfund, Corrective Action, State Response, or Voluntary Cleanup Sites													
Completed, Certified, No Further Action, or De-Listed	52	1	0	0	9	0	5	1	0	0	3	10	81
Active, Backlog, Inactive, or Referred to Other Agency	88	0	1	2	19	1	9	5	0	1	13	13	152
Subtotal	140	1	1	2	28	1	14	6	0	1	16	23	233
Historical or Tiered Permit Sites													
Certified or No Further Action	26	0	0	0	1	0	6	0	0	0	1	9	43
Active, Backlog, Inactive, or Referred to Other Agency	121	4	0	1	20	1	38	4	0	0	9	13	211
Subtotal	147	4	0	1	21	1	44	4	0	0	10	22	254
Hazardous Waste Facilities													
Permitted – Operating, Interim Operating Permitted, and Post-Closure Permitted	9	0	0	0	3	0	1	0	0	0	0	2	15
Historical – Non-Operating	38	0	0	0	12	0	5	3	0	0	3	6	67
Subtotal	47	0	0	0	15	0	6	3	0	0	3	8	82
TOTAL	679	13	3	11	77	7	82	25	0	5	49	69	1,020

Source: DTSC EnviroStor database 2014. <http://www.envirostor.dtsc.ca.gov/public/>

5. Environmental Analysis HAZARDS AND HAZARDOUS MATERIALS

GeoTracker

The GeoTracker database, maintained by the SWRCB, lists a range of types of hazardous materials sites that could affect groundwater quality, including leaking underground storage tank sites, cleanup program sites, land disposal sites, and military sites. A search of this database found a number of such facilities in the 12 cities completely or mostly served by the District (see Table 5.8-2).

Table 5.8-2 GeoTracker Sites

Status	Los Angeles	San Fernando	West Hollywood	Bell	Carson	Cudahy	Gardena	Huntington Park	Lomita	Maywood	South Gate	Vernon	TOTAL
Leaking Underground Storage Tank Sites													
Open – Site Assessment or Open – Assessment and Interim Remedial Action	74	1	2	0	10	0	10	6	1	1	8	1	114
Open – Remediation or Open – Verification Monitoring	109	1	2	3	19	2	6	1	1	1	6	2	153
Open – Eligible for Closure or Open – Inactive	75	1	3	3	7	1	7	3	0	1	5	2	108
Completed – Case Closed	879	12	30	25	124	11	92	44	17	19	74	18	1,345
Subtotal	1,137	15	37	31	160	14	115	54	19	22	93	23	1,720
Cleanup Program Sites													
Open – all open statuses	173	1	13	2	70	2	22	9	0	1	16	6	315
Completed – Case Closed	153	1	1	1	60	3	17	1	1	3	16	12	269
Subtotal	326	2	14	3	130	5	39	10	1	4	32	18	584
Land Disposal Sites													
Open – all open statuses	14	0	0	0	18	0	2	1	0	0	3	2	40
Completed – Case Closed	3	0	0	0	3	0	0	0	0	0	0	0	6
Subtotal	17	0	0	0	21	0	2	1	0	0	3	2	46
Military Sites Military Cleanup Sites, Military Privatized Sites, and Military UST Sites													
Open – all open statuses	9	0	0	0	0	0	0	0	0	0	0	0	9
Subtotal	9	0	0	0	0	0	0	0	0	0	0	0	9
Registered Underground Storage Tank (UST) Sites													
	1,293	18	6	33	43	4	76	22	11	10	52	0	1,568
TOTAL	2,782	35	57	67	354	23	232	87	31	36	180	43	3,927

Source: SWRCB GeoTracker 2014. <http://geotracker.waterboards.ca.gov/>

5. Environmental Analysis HAZARDS AND HAZARDOUS MATERIALS

Hazardous Waste Generators

Large-quantity generators generate 1,000 kilograms per month or more of hazardous waste, or more than 1 kilogram per month of acutely hazardous waste. Small quantity generators generate from 100 to 999 kilograms per month of hazardous waste. A search of the RCRAInfo database, maintained by the EPA, found a number of hazardous waste generators in the 12 cities completely or mostly served by the District (see Table 5.8-3).

Table 5.8-3 RCRAInfo Hazardous Waste Generators

City	Large Quantity Generators	Small Quantity Generators	Total
Los Angeles	522	2,970	3,492
San Fernando	6	98	104
West Hollywood	9	29	38
Bell	10	36	46
Carson	51	188	239
Cudahy	5	20	25
Gardena	39	351	390
Huntington Park	16	92	108
Lomita	2	39	41
Maywood	4	32	36
South Gate	28	178	206
Vernon	24	124	148
Total	716	4,157	4,873

Source: U.S. Environmental Protection Agency (USEPA). RCRAInfo. 2014, March 6. <http://www.epa.gov/enviro/facts/rcrainfo/search.html>.

A recent search also found 166 LAUSD facilities (individual schools and administration/maintenance buildings) identified in the RCRAInfo database.³⁰ Each of the LAUSD facilities has been assigned a unique hazardous waste identification number that is used for the offsite transport and disposal of hazardous wastes. The District's hazardous waste management program, including prior approval for all waste management activities conducted at individual schools and facilities, is overseen by the District's Environmental Compliance Manager.

5.8.1.3 AIRPORTS AND HELIPORTS

Airports

Assembly Bill 2776, effective January 1, 2004, defines an "airport influence area" as the area where airport-related factors "may significantly affect land uses or necessitate restrictions on those uses as determined by an airport land use commission." The California Public Utilities Code establishes airport land use commissions in every county to provide for the orderly development of air transportation and ensure compatible land uses

³⁰ U.S. Environmental Protection Agency (USEPA). RCRAInfo. 2014, March 6. <http://www.epa.gov/enviro/facts/rcrainfo/search.html>.

5. Environmental Analysis

HAZARDS AND HAZARDOUS MATERIALS

around airports that are open to public use. According to California Department of Transportation (Caltrans), Division of Aeronautics, the airport influence area is usually the planning area designated by an airport land use commission for each airport.

Three public use airports are in the District: Los Angeles International Airport, Van Nuys Airport, and Whiteman Airport. All three airports are in the City of Los Angeles; the latter two are also in the San Fernando Valley. Bob Hope Airport in the City of Burbank and Santa Monica Airport in the City of Santa Monica have influence areas that extend into the District. The influence area for Hawthorne Airport (Jack Northrop Field) in the City of Hawthorne does not extend into the District, but its runways lie within two miles of existing or potential District school sites. Existing District schools within the influence areas of these airports are identified as follows:

- One District school is located within the airport influence area for Van Nuys Airport: the North Valley Occupational Center Aviation Center.³¹ This school is on airport property at the southeast corner of Saticoy Street and Havenhurst Avenue.
- Four District schools are within the airport influence area for Los Angeles International Airport: Westchester High School; Paseo Del Rey Magnet School; Emerson Adult Center; and Loyola Elementary School.³²
- No District schools are within the airport influence area for Whiteman Airport.³³
- One District school is partly in the airport influence area for Bob Hope Airport: Glenwood Elementary School.³⁴
- No District schools are within the airport influence area for Santa Monica Airport.³⁵

Heliports

There are 74 private-use heliports in the 12 cities in or mostly in the District, including 69 in the City of Los Angeles, 1 in the City of Carson, 2 in the City of San Fernando, 1 in the City of Vernon, and 1 in the City of

³¹ Airport Land Use Commission (ALUC), Los Angeles County. 2003, May 13. Van Nuys Airport Airport Influence Area. http://planning.lacounty.gov/assets/upl/project/aluc_airport-van-nuys.pdf.

³² Airport Land Use Commission (ALUC), Los Angeles County. 2003, May 13. Los Angeles International Airport Airport Influence Area. http://planning.lacounty.gov/assets/upl/project/aluc_airport-lax.pdf.

³³ Airport Land Use Commission (ALUC), Los Angeles County. 2003, May 13. Whiteman Airport Airport Influence Area. http://planning.lacounty.gov/assets/upl/project/aluc_airport-whiteman.pdf.

³⁴ Airport Land Use Commission (ALUC), Los Angeles County. 2003, May 13. Burbank/Glendale/Pasadena Airport. http://planning.lacounty.gov/assets/upl/project/aluc_airport-burbank.pdf.

³⁵ Airport Land Use Commission (ALUC), Los Angeles County. 2003, May 13. Santa Monica Airport Airport Influence Area. http://planning.lacounty.gov/assets/upl/project/aluc_airport-santa-monica.pdf.

5. Environmental Analysis HAZARDS AND HAZARDOUS MATERIALS

West Hollywood.³⁶ Siting of heliports in the City of Los Angeles is subject to approval from the Los Angeles City Fire Department and a zoning consistency determination or a Conditional Use Permit.³⁷

5.8.1.4 EMERGENCY RESPONSE PLANS

City of Los Angeles

The City of Los Angeles Emergency Management Department (EMD) is responsible for the coordination of Los Angeles' emergency planning, training, response, and recovery efforts in the midst of major disasters such as fires, floods, earthquakes, acts of terrorism, and major events in the city that require involvement by multiple city departments. EMD maintains the city's emergency operations master plan and local hazard mitigation plan. EMD also operates the city's emergency operations center.

Los Angeles County

All cities within the District are member jurisdictions of the Los Angeles County Operational Area. The Los Angeles County Office of Emergency Management (OEM) maintains the Los Angeles County Operational Area Emergency Response Plan and the County of Los Angeles All-Hazard Mitigation Plan. OEM leads and coordinates disaster plans and disaster preparedness exercises for all cities and 288 special districts in the County, including the LAUSD.

LAUSD

OEHS manages four District EOCs; responds to District emergency response situations (e.g., hazardous materials, fires, chemical spills, sewer overflows, vandalism); provides emergency response training; coordinates the District emergency response equipment inventory; responds to catastrophic emergencies; liaises with local, state, and federal emergency management agencies; communicates with District executive management during large-scale emergencies; and conducts post-event analyses of District response activities. OEHS staff work with School Operations and School Police to ensure that required District emergency response/management processes are in place and functional. Day-to-day emergency preparedness and response planning and coordination are overseen by the LAUSD's Office of Emergency Services.

The LAUSD has developed a district-wide Emergency Operations Plan that addresses the District's responsibilities in emergencies associated with natural disaster, human-caused emergencies, and technological incidents.³⁸ The EOP provides a framework for coordination of responses and recovery efforts within the District in coordination with local, state, and federal agencies. It also establishes an emergency organization to direct and control operations at all sites during a period of emergency by assigning responsibilities to specific personnel. The EOP meets the requirements of Los Angeles County's policies on emergency response and planning and the Standardized Emergency Management System (SEMS) operations area response.

³⁶ Airtav.com. 2014, January 30. Airport Information. <http://www.airnav.com/airports/>.

³⁷ Planning Advisory Service, Information Report 198, May 1965. <https://planning.org/pas/at60/report198.htm?print=true>

³⁸ LAUSD Emergency Operations Plan, Updated April 2010.

5. Environmental Analysis

HAZARDS AND HAZARDOUS MATERIALS

District schools are required to comply with California Education Code Sections 32281-32289 dealing with the preparation of “safe school plans” (SSPs) to address violence prevention, student wellness, emergency preparedness, traffic safety, and crisis intervention. The District has developed an SSP model plan and guidelines to assist individual schools in the development of their individual SSPs.³⁹ The purpose of the model plan is to standardize SSPs throughout the District and minimize the time required for annual updates. It comprises three volumes: 1) Coordinated Safe and Health School Plan, Prevention Programs; 2) Emergency Procedures; and 3) Recovery Procedures. The District also has developed an emergency response protocol⁴⁰ for use during an emergency on a District site during renovation or modification work performed by a contractor. The protocol is a supplement to the contractor’s emergency response plan. Finally, safety procedures are in place for specific school activities and conditions, such as school laboratories⁴¹ and methane safety.⁴²

5.8.1.5 WILDFIRE HAZARDS

Fire Hazard Severity Areas in Los Angeles County are designated by the California Department of Forestry and Fire Prevention and in incorporated cities by the Los Angeles County Fire Department. Fire hazard severity zone levels range from moderate to very high. Fire hazard severity zones are designated in three types of areas based on what level of government is financially responsible for preventing and suppressing wildfires:

- **Federal Responsibility Areas:** The federal government is financially responsible for wildfire suppression. Within the District, the Angeles National Forest and federal land in the Santa Monica Mountains National Recreation Area are federal responsibility areas.
- **State Responsibility Areas:** The state is financially responsible for wildfire suppression. Within the District, state responsibility areas are in outlying areas such as the Santa Susana Mountains, foothills of the San Gabriel Mountains, and parts of the Santa Monica Mountains.
- **Local Responsibility Areas:** Cities or Los Angeles County are financially responsible for wildfire suppression. Local responsibility areas in the District are along foothills of the Santa Susana and San Gabriel Mountains, and in the Verdugo Mountains, Santa Monica Mountains, Hollywood Hills, San Rafael Hills, Puente Hills, and in other hills in the central Los Angeles area (see Figure 5.8-1, *Fire Hazard Severity Zones*).

5.8.1.6 HAZARDOUS MATERIALS PIPELINES

Per California Education Code Section 17213(a)(3), a school district may not acquire a school site if it contains one or more pipelines that carry hazardous substances, extremely hazardous substances, or hazardous wastes, unless the pipeline is a natural gas line that is used only to supply natural gas to that school or neighborhood. Further, California Education Code Section 17212.2(a) states:

³⁹ LAUSD OEHS Reference Guide REF-1242.6, Safe School Plans Update for 2009-2010, August 21, 2009.

⁴⁰ LAUSD Existing Facilities – Construction Safety, SAF: 30, revised March 2, 2007.

⁴¹ LAUSD OEHS School Laboratory Chemical Hygiene & Safety Plan, January 2005.

⁴² LAUSD OEHS Reference Guide REF 5671.0 Methane Safety Program Implementation Guidelines, January 9, 2012.

5. Environmental Analysis HAZARDS AND HAZARDOUS MATERIALS

The governing board of a school district may make a written request upon a person, corporation, public utility, local publicly owned utility, or governmental agency for information necessary or useful to assess and determine the safety of a proposed school site or an addition to an existing school site, pursuant to Section 17251 and this chapter, including pipelines, electric transmission and distribution lines, railroads, and storage tanks. The written request shall identify the physical location of the school site for which information is sought, describe the information sought, and contain a statement as to why the information is needed or useful. Information requested may include...

(2) Whether there are existing pipelines, planned pipelines, or easements for pipelines on, or in proximity to, as specified pursuant to regulations adopted pursuant to Section 17251, the school site, including the location of the pipeline, the age of the pipeline, the pipeline material, the class of pipeline, the diameter of the pipeline, the depth at which the pipeline is buried, the wall thickness of the pipeline, the product or products transported by the pipeline, the operating pressure of the pipeline, the history of spills or leaks of material being transported by the pipeline, as reported to a governmental agency, and the location of the shutoff valves for the pipeline that are capable of preventing or halting the transport of product or products to the schoolsite.

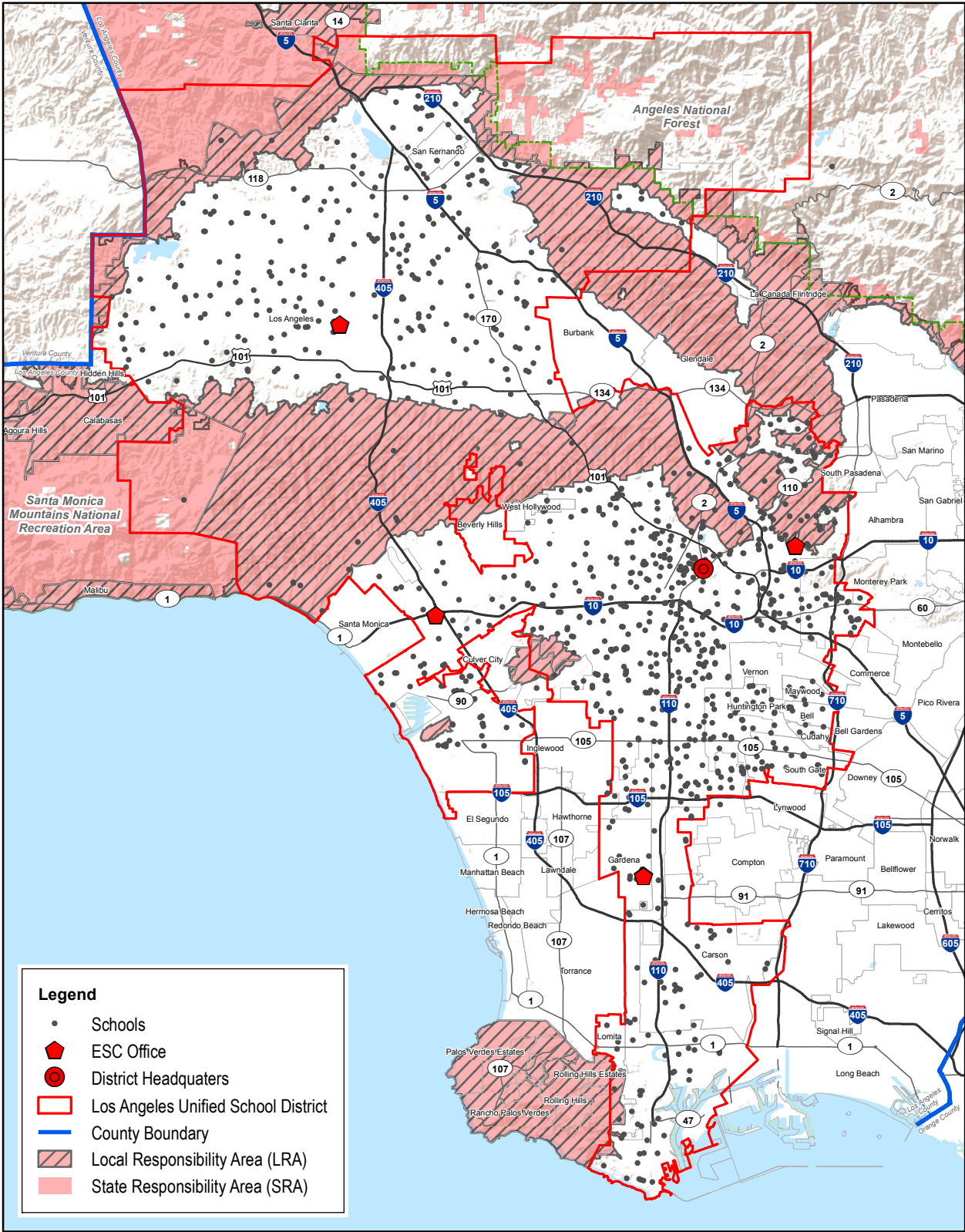
CCR Title 5, Section 14010(h), establishes the following requirements for new school sites with respect to hazardous materials pipelines:

The site shall not be located near an above-ground water or fuel storage tank or within 1,500 feet of the easement of an above-ground or underground pipeline that can pose a safety hazard as determined by a risk analysis study, conducted by a competent professional, which may include certification from a local public utility commission.

Information on completing a safety study related to high-pressure gas pipelines that cross or lie within railroad track easements is discussed in CCR Title 5, 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 trained in assessing cargo manifests, frequency, speed, and schedule of railroad traffic, grade, curves, type and condition of track need for sound or safety barriers, need for pedestrian and vehicle safeguards at railroad crossings, presence of high pressure gas lines near the tracks that could rupture in the event of a derailment, preparation of an evacuation plan. In addition to the analysis, possible and reasonable mitigation measures must be identified.

5. Environmental Analysis Figure 5.8-1 - Fire Hazard Severity Zones



Source: California Department of Forestry and Fire Protection - Fire and Resource Assessment Program (FRAP); 2007LRA data; 2012 SRA data.

5. Environmental Analysis HAZARDS AND HAZARDOUS MATERIALS

This page intentionally left blank.

5. Environmental Analysis

HAZARDS AND HAZARDOUS MATERIALS

By CDE policy,⁴³ any pipeline that has a maximum operating capacity of at least 80 pounds per square inch, including but not limited to those that carry natural gas, liquid petroleum, fuels, or hazardous chemicals, shall be included in a pipeline survey, regardless of whether the pipeline is classified as a transmission or distribution line. Pipelines within a railroad or other easement or pipelines serving gas and oil well sites and fields are also included.

Specific guidance for the evaluation of high-pressure water lines is in CDE's "School Site Selection and Approval Guide,"⁴⁴ as follows:

To ensure the protection of students, faculty, and school property if the proposed school site is within 1,500 feet of the easement of an aboveground or underground pipeline that can pose a safety hazard, the school district should obtain the following information from the pipeline owner and operator:

- Pipeline alignment, size, type of pipe, depth of cover.
- Operating water pressures in pipelines near the proposed school site.
- Estimated volume of water that might be released from the pipeline should a rupture occur on the site.
- Owner's assessment of the structural condition of the pipeline.

5.8.2 Thresholds of Significance

According to CEQA Guidelines (14_CCR Sections 15000–15387, Appendix G) and CEQA Statute (PRC Section 21151.8), a project would normally have a significant effect on the environment if it would:

5.8.2.1 CEQA GUIDELINES THRESHOLDS

- HAZ-1 Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.
- HAZ-2 Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.
- HAZ-3 Emit hazardous emissions or handle hazardous or acutely hazardous materials, substance, or waste within one-quarter mile of an existing or proposed school.
- HAZ-4 Be located on a site which is included on a list of hazardous materials compiled pursuant to Government Code Section 65962.5 and, as a result, would create a significant hazard to the public or the environment.

⁴³ CDE Proposed Standard Protocol Pipeline Risk Analysis, Prepared by URS Corporation, February 2007.

⁴⁴ CDE Schools Facilities Planning Division, Resources for School Facilities Planning, School Site Selection and Approval Guide, 2004. <http://www.cde.ca.gov/ls/fa/sf/schoolsiteguide.asp>.

5. Environmental Analysis HAZARDS AND HAZARDOUS MATERIALS

- HAZ-5 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 result in a safety hazard for people residing or working in the project area.
- HAZ-6 For a project in the vicinity of a private airstrip, result in a safety hazard for people residing or working in the project area.
- HAZ-7 Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.
- HAZ-8 Expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to the urbanized areas or where residences are intermixed with wildlands.

5.8.2.2 CEQA STATUTE THRESHOLDS

An environmental impact report shall not be certified or a negative declaration shall not be approved for a project involving the purchase of a school site or the construction of a new elementary or secondary school by a school district if the site contains:

- HAZ-9 A current or former hazardous waste disposal site or solid waste disposal site, unless the wastes been removed. ~~(PRC Section 21151.8(a)(1)(A)).~~⁴⁵
- HAZ-10 A hazardous substance release site identified by the Department of Toxic Substances Control in a current list adopted pursuant to Section 25356 of the Health and Safety Code for removal or remedial action pursuant to Chapter 6.8 (commencing with Section 25300) of Division 20 of the Health and Safety Code.⁴⁶ ~~(PRC Section 21151.8(a)(1)(B)).~~
- HAZ-11 One or more pipelines, situated underground or aboveground, which carry hazardous substances, acutely hazardous materials, or hazardous wastes, unless the pipeline is a natural gas line that is used only to supply natural gas to that school or neighborhood or other nearby schools.⁴⁷ ~~(PRC Section 21151.8(a)(1)(C)).~~

5.8.3 Environmental Impacts

The applicable thresholds are identified in brackets after the impact statement.

⁴⁵ ~~(PRC Section 21151.8(a)(1)(A)).~~

⁴⁶ ~~(PRC Section 21151.8(a)(1)(B)).~~

⁴⁷ ~~(PRC Section 21151.8(a)(1)(C)).~~

5. Environmental Analysis

HAZARDS AND HAZARDOUS MATERIALS

IMPACT 5.8-1: SUP-related projects would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. [Threshold HAZ-1]

All SUP Projects

Most projects constructed under the SUP would likely involve the transport, storage, use, or disposal of limited quantities of hazardous materials, such as fuels, lubricants, solvents and degreasers, and paints. Examples of such activities include fueling and servicing construction equipment, application of paints and other coatings, and demolition of buildings that contain asbestos or lead-based paint. At any construction site, activity would be short term or one time in nature and would be governed by existing regulations of several agencies, including the EPA, DOT, OSHA, California Division of Occupational Safety and Health (Cal/OSHA), DTSC, and the Los Angeles city or county fire department, depending on jurisdiction.

Once a project is completed and the new facility is operational, hazardous materials that might be handled, used, transported, or disposed of include standard cleaning products, pesticides, herbicides, paints, fuels, and lubricants used in association with standard campus janitorial, maintenance, and landscaping. In addition, certain curricula, such as chemistry and industrial arts (wood, metal, electronics, and auto shops), could involve the use of small quantities of chemicals, fuels and other petroleum products, solvents, and paints. Small volumes of hazardous wastes, such as waste paint, batteries, fluorescent lamps, mercury-containing equipment, or unused maintenance products would be generated to maintain the new school facilities, which would require management in accordance with standard District policies and practices. Most hazardous materials stored on school campuses present little risk of upset, since they are generally stored in small containers (30 gallons or less) in designated areas. The amounts of hazardous materials that are handled at any one time are likewise small, reducing the potential consequences of an accident during transport, storage, or handling.

The types and amount of hazardous materials that are now handled by the District are not expected to substantially change upon construction of individual projects or upon completion of the SUP in its entirety. The amounts of hazardous materials handled at a given campus would remain relatively small and would be subject to federal, state, and local health and safety requirements. The District would continue to implement its existing programs, practices, and procedures for handling hazardous materials, which would be extended to all new facilities. For example, only commercial products on a chemical inventory list maintained by OEHS would be approved for use, and hazardous wastes would have to be stored in designated areas with appropriate warning signs and labels. Hazardous business plans would be developed and filed with the local CUPA if any new facility was used for the storage of hazardous materials above threshold quantities. Therefore, no significant impacts related to hazardous materials are expected to occur during operation of new facilities constructed under the School Upgrade Program.

An important component of the SUP is to eliminate hazards associated with asbestos and lead-based paint in existing buildings, which creates a unique set of hazardous-materials-handling challenges during the project demolition phase. Additionally, hazardous materials or contaminated soil may be encountered when preparing for new school projects or unexpectedly during excavation or grading activities associated with construction. Potential impacts associated with these special circumstances are analyzed in the following sections.

5. Environmental Analysis HAZARDS AND HAZARDOUS MATERIALS

Asbestos

Any activity that involves cutting, grinding, or drilling during building renovation or demolition, or that involves relocation of underground utilities, could release friable asbestos fibers unless proper precautions are taken. The federal Clean Air Act regulates asbestos as a hazardous air pollutant, which subjects it to regulation by the South Coast Air Quality Management District (SCAQMD) under its Rule 1403. OSHA also regulates asbestos as a potential worker safety hazard. The Asbestos-Containing Materials in Schools rule (Code of Federal Regulations [CFR] Title 40, Part 763, Subpart E), promulgated under the federal Asbestos Hazard Emergency Response Act (AHERA), requires local education agencies to inspect their school buildings for asbestos-containing building material, prepare asbestos management plans, and perform asbestos response actions to prevent or reduce asbestos hazards. AHERA also tasked EPA with developing a model plan for states for accrediting persons conducting asbestos inspection and corrective-action activities at schools.

Compliance with asbestos regulations and requirements is the responsibility of the District's Facilities Environmental Technical Unit (FETU)~~Asbestos Technical Unit (ATU)~~, which was established in 1987. The FETU~~ATU~~ has three main functions: 1) identification of asbestos-containing building materials; 2) abatement of these materials, including repair or removal of asbestos; and 3) design and preparation of major abatement contract specifications and inspection of contractor work.⁴⁸ The District maintains an inventory of school-owned buildings that could contain asbestos and provides the required employee, contractor, and public notifications of these locations. All projects at existing school and administrative sites must be reviewed for potential impacts to asbestos-containing materials (ACM) prior to the project being started. Prior to disturbance, materials that are suspected of containing asbestos are tested for asbestos content using accredited laboratories. All ACM must be removed by licensed asbestos abatement contractors or by trained and certified FETU~~ATU~~ personnel using work practices and engineering controls that have been designed to reduce the potential for asbestos fiber release. Specific handling procedures in place for handling ACM are the following, which the FETU~~ATU~~ will abide by as and when needed:⁴⁹

- Asbestos is to be handled only by qualified and certified contractors. Asbestos contractors/subcontractors must be approved in accordance with applicable federal, state, and local regulations and must be approved by the District to perform abatement and disposal of ACM and asbestos-containing construction materials (ACCM), as defined.
- It is the contractor's responsibility to review the Asbestos Assessment Report (Phase 1) and the Abatement Design (Phase 2) prepared for a site prior to the commencement of work and take the necessary steps to ensure the safety of students, faculty, contractor employees, and the general public through compliance with regulatory and District specification requirements.
- Contractors must verify the presence or absence of asbestos content in building materials prior to impacting these materials during construction remodeling or demolition work.

⁴⁸ LAUSD Office of the Inspector General, Report of Audit, Asbestos Technical Unit, October 2, 2001.

⁴⁹ LAUSD Facilities School Maintenance and Operations Repair & Construction Safety Standards, February 28, 2013.

5. Environmental Analysis

HAZARDS AND HAZARDOUS MATERIALS

- Upon discovery of any ACM or ACCM or presumed asbestos containing materials (PACM) not identified in the Phase 1 report, the contractor will stop work in such areas and notify the LAUSD Construction Inspector. The material will be inspected and tested, if necessary, by the District's ATU or by a District-assigned environmental consultant.
- The contractor shall ensure employees are trained in asbestos awareness to identify ACM, ACCM, and PACM. Training will be in compliance with the requirements of the District's Standard Specification Section 13280, "Asbestos Abatement and Asbestos Related Disturbance", and be documented. Proof of such training is required to be submitted to a District-authorized representative prior to commencement of work.
- All asbestos abatement/removal work must follow all regulations of the EPA and/or applicable state agency, OSHA, and the SCAQMD.
- LAUSD Maintenance and Operations personnel working in areas with ACM or PACM must have appropriate asbestos training, which may include minor abatement and compliance with negative exposure assessment protocols. OEHS is responsible to ensure all asbestos surveys have been completed and information and training disseminated to effected employees and contractors per the applicable asbestos standards and District protocols.

In addition, the following standard District procedures apply to asbestos abatement action which the District will implement as and when needed:

- **LAUSD Section 13280: Asbestos Abatement and Asbestos Related Disturbance (November 21, 2003).** Construction contractors are required to comply with the requirements of this LAUSD standard specification during any project where ACM may be disturbed. Included among the specific requirements are procedures for worker training, permitting, air monitoring, personnel protection, development of emergency plans, waste management, and reporting. Specific procedures are outlined for the performance of asbestos abatement, including maintenance of regulated areas through polyethylene sheeting and air filtration equipment, wet cleaning and vacuum cleaning of exposed surfaces, and posting of signs.

Compliance with federal and state regulations and the District guidelines and procedures outlined above would ensure that impacts associated with the handling and disposal of ACM will be less than significant for any given school construction or modernization project.

Lead

Lead is a naturally occurring element that can be found in various building materials and projects, such as paint (lead-based paint), water pipes, and solder in plumbing systems. Because of its toxic properties, lead is regulated as a hazardous material. Lead is also regulated as a toxic air contaminant. Any activity that involves cutting, grinding, or drilling during building renovation or demolition, or that involves relocation of underground utilities, could release lead dust or particles unless proper precautions are taken. State-certified

5. Environmental Analysis HAZARDS AND HAZARDOUS MATERIALS

contractors must perform the inspection, testing, and removal (abatement) of lead-containing building materials in compliance with applicable health and safety and hazardous materials regulations.

As with asbestos, all projects at existing school and office sites must be reviewed by the ATU for impact to lead-based paint prior to the project being started. All coated surfaces (paint, varnish, or glazed) are assumed to contain lead, and work that impacts coated surfaces must be performed by properly trained individuals. Specific handling procedures for handling building materials that may contain lead are the following, with which the ATU will ensure compliance as and when needed:⁵⁰

- Lead abatement, as defined, is to be performed by contractors or subcontractors whose workers are certified by the California Department of Public Health. Lead-related construction work may be performed by contractors' or subcontractors' workers who have been trained in lead awareness, as described in the District's Standard Specification Section 13282, "Lead Abatement and Lead Related Construction Work." Evidence of certification and/or training is required to be provided to the District's environmental representative prior to the commencement of work.
- It is the contractor's responsibility to review the assessment report addressing the impact to lead-based materials, lead-containing materials or coatings, and materials assumed to contain lead prior to commencement of work and take the necessary steps to ensure the safety of students, faculty, contractor employees, and the general public.
- Contractor must identify any lead-based paint or coatings and assumed lead-containing coatings in or on the materials to be impacted within the proposed scope of work prior to any construction, remodeling, maintenance, repair, or demolition activities.
- No lead abatement will proceed until the District's environment representative has given written approval of the lead abatement contractor's written abatement work plan.
- No work by contractors other than the lead abatement contractor will be permitted to work in regulated areas until clearance is provided by the District's environmental representative.
- The lead abatement contractor or general contractor performing monitoring of lead-related construction work will be responsible for characterizing the waste stream (e.g., paint chips, components) and disposing of waste according to the characterization. Hazardous waste will be transported under a Uniform Hazardous Waste Manifest in accordance with District Standard Specification Section 13282.

In addition, the following standard District procedures apply to lead abatement projects, which the District will also implement as appropriate:

⁵⁰ LAUSD Facilities School Maintenance and Operations Repair & Construction Safety Standards, February 28, 2013.

5. Environmental Analysis

HAZARDS AND HAZARDOUS MATERIALS

- **LAUSD Section 13282: Lead Abatement and Lead Related Construction Work (March 15, 2007).** Construction contractors are required to comply with the requirements of this LAUSD standard specification during any project where lead-containing materials may be disturbed. Included among the specific requirements are procedures for worker training, permitting, air monitoring, personnel protection and medical monitoring, development of emergency plans, and waste management. Procedures specific to waste disposal are testing requirements for determining the hazardous properties of the lead-containing materials using prescribed federal and state testing procedures.⁵¹ Specific procedures are outlined for the abatement of lead-based paint, including its removal by sanding, chemical agents, or water jets, or its isolation by encapsulation.

Compliance with federal and state regulations and the District guidelines and procedures outlined above would ensure that impacts associated with the handling and disposal of lead-containing building materials ~~will~~ would be less than significant for any given school construction or modernization project.

Water Intrusion Assessment and Mold

- Water Intrusion Assessment and Mold Remediation Procedure (February 9, 2014). Construction contractors are required to comply with the requirements of this LAUSD standard specification during any project where water intrusion and/or mold are identified. Included among the specific requirements are procedures for prevention, inspection, assessment and sampling, containment, remediating building materials, and hazard communication and notification.⁵² The information contained in this manual was compiled from the following reference sources: The Environmental Protection Agency (EPA), The Centers for Disease Control (CDC), The California Department of Public Health (CA CDPH), The New York Department of Health Services (NYDHS), American Conference of Governmental Industrial Hygienist (ACGIH), Institute of Inspection, Cleaning and Restoration (IICRC), Guidelines for the Assessment of Bioaerosols in the Indoor Environment, American Society of Heating, Refrigeration and Air-Conditioning Engineers (ASHRAE), The City of Los Angeles, and the California Department of Occupational Safety and Health (CA DOSH). Currently there are no United States Federal, California State or Los Angeles City regulations for evaluating potential health effects of fungal contamination and remediation. These guidelines are subject to change as more information regarding fungal contaminants becomes available.

Other Hazardous Materials

Hazardous materials that exist at a new school construction or modernization site, often identified during performance of a Phase I ESA, would be handled in accordance with federal and state laws and regulations prior to embarking on a new school project. In particular, DOT regulations,⁵³ (CFR Title 49, Parts 172 through 179 and 387), EPA regulations (CFR Title 40, Parts 136, 261, 262, and 761),⁵⁴ and federal OSHA regulations⁵⁵ (CFR

⁵¹ Toxicity Characteristic Leaching Procedure (TCLP) test for federal hazardous wastes and Total Threshold Limit Concentration (TTLC) and Soluble Threshold Limit Concentration (STLC) tests for state hazardous wastes.

⁵² Facilities Environmental Technical Unit. Special Construction. Water Intrusion and Mold Remediation Procedure. February 9, 2014.

⁵³ CFR Title 49, Parts 172 through 179 and 387.

⁵⁴ CFR Title 40, Parts 136, 261, 262, and 761.

5. Environmental Analysis HAZARDS AND HAZARDOUS MATERIALS

~~Title 29, Part 1910.120~~ govern the handling, storage, transportation, and disposal of hazardous substances. Such items may include spent, unused, abandoned, or discarded hazardous waste or commercial products containing hazardous substances. The following standard District procedures apply in these instances, which the District will follow:

- **LAUSD Section 13614: Abatement of Hazardous Materials (July 7, 2003).** This specification includes procedures for the proper packaging, transportation, and disposal of any identified or discovered hazardous materials that must be removed before construction can proceed. It specifically excludes underground storage tanks and contaminated soil or groundwater. Construction contractors are required to comply with specific procedures regarding worker training, health and safety, hazardous material containment, and offsite transport and disposal.

New school construction and modernization projects would be subject to environmental review processes designed to ensure that soil or groundwater contamination is not present in any areas of a site that would be disturbed. The environmental review process could involve the performance of a Phase I Environmental Site Assessment, Preliminary Environmental Assessment, and/or Response Action, as outline previously in this Hazards Section. If contaminated soil or groundwater were discovered, it would be removed/remediated to the satisfaction of the LAUSD-OEHS and/or the DTSC. The removal or remedial action would be conducted in accordance with federal and state requirements governing hazardous materials excavation, onsite handling, and offsite transport to minimize potential exposures to construction workers and the general public. The procedures required by the Education Code and CCRs for investigating, assessing and remediating hazardous materials are outlined above. Once a project has been granted environmental clearance, additional discoveries of contamination during construction are not anticipated, but could occur. If hazardous materials or contaminated soil were encountered during construction, the contractor would stop work and immediately notify the District. The District would arrange for an environmental assessment to determine the nature and extent of the contamination and the type of remediation that is required. Potential remedial measures could include, but are not necessarily limited to, excavation and offsite disposal, excavation and onsite treatment, or in-situ treatment. These activities would be performed in accordance with all applicable federal, state, and local laws and regulations pertaining to notification, environmental investigation, and cleanup.

In the event that a previously unknown underground storage tank (UST) was discovered, it would be left in place and cordoned off, and work in the vicinity of the UST would cease immediately. The contractor would notify the District, who in turn would notify the local CUPA in charge of UST programs.⁵⁶ The UST would be registered and a permit would be obtained for its removal. Once the UST was removed, soil samples would be collected under agency oversight to determine whether or not there had been a release of the tank contents. If a release were identified, it would be remediated under CUPA, DTSC, and/or Los Angeles Regional Water Quality Control Board (RWQCB) oversight, as appropriate. These activities would continue

⁵⁵ CFR Title 29, Part 1910.120.

⁵⁶ The Los Angeles City Fire Department is the CUPA responsible for underground storage tank (UST) programs in the City of Los Angeles. Other CUPAs, including the Los Angeles County Department of Public Works, have jurisdiction for UST programs in areas outside Los Angeles City boundaries.

5. Environmental Analysis

HAZARDS AND HAZARDOUS MATERIALS

until a “no further action” letter had been received from the responsible agency. Other potentially hazardous buried features discovered during construction, such as hydraulic hoists, seepage pits, clarifiers, and sumps, would be similarly investigated and remediated, except that regulatory agency notification and oversight would not be required unless a reportable release was discovered or the agency was already involved in the project.

In the event that contaminated soil, contaminated groundwater, or potentially hazardous subsurface features such as USTs were encountered, the construction schedule would be modified or delayed to ensure that construction would not inhibit further investigation and remedial activities and would not expose the public or construction workers to significant risks associated with hazardous conditions. Compliance with federal and state regulations and the District guidelines outlined above would ensure that impacts associated with exposure to hazardous materials encountered prior to or during construction are less than significant for any given school construction or modernization project.

New Construction on New Property or Existing Campus

If the District elects to receive state bond funding for new construction projects and the project does not qualify for a CEQA exemption, the DTSC would be engaged through the LAUSD Master Oversight Agreement to oversee and approve the project in accordance with California Education Code, Sections 17213.1 and 17213.2.⁵⁷ If either of these two conditions is not met, the District OEHS would perform a site assessment evaluation of the environmental impacts of the project and self-certify that all potential hazards and health risks have been identified and mitigated to less than significant levels. The self-certification process would be conducted in accordance with the Site Assessment and Remediation procedures outlined in the previous section “LAUSD Practices, Procedures, and Standard Conditions,” and in particular with the OEHS “Reference Guide: Procedures for Environmental Review of Proposed Projects” (REF-5314.1). The DTSC oversight or LAUSD self-certification process would ensure that potential impacts resulting from the transport, use, and/or disposal of hazardous materials during the construction or operational phase of a project are less than significant.

Modernization, Repair, Replacement, Upgrade, Remodel, Renovation and Installation

Assuming that all modernization, repair, replacement, upgrade, remodel, and renovation projects are either locally funded or funded through the state’s Form SFPD 4.08 Modernization application process, DTSC involvement would likely not be required or solicited for any modernization project conducted under the SUP. Instead, the OEHS would self-certify that the potential hazards and health risks associated with the project are negligible or less than significant, or would require the necessary mitigation measures to be taken to reduce the potential impacts to less than significant levels. Several types of modernization projects are considered minor improvements that do not require OEHS notification or review, as summarized in Table 5.8-4.

⁵⁷ The LAUSD and DTSC entered into a Master Oversight Agreement on February 10, 2000 to facilitate DTSC oversight of environmental investigations and response actions conducted by the District in accordance with Education Code Section 17213.1 and 17213.2. The Master Oversight Agreement was updated on June 5, 2013 to assist the District in obtaining state bond funding for projects that require a response action that has not been completed.

5. Environmental Analysis HAZARDS AND HAZARDOUS MATERIALS

Modernization projects not on this list, including those that involve historical resources, sensitive biological resources, adjacent noise-sensitive uses, listed hazardous waste sites, significant interior modernization projects affecting 20 percent or more of the total building space, and activities that require state funding, would be reviewed by OEHS for CEQA applicability and the need for any technical studies to address potential safety hazards or site assessment activities to evaluate environmental conditions. This review would be conducted in accordance with procedures outlined in the OEHS “Reference Guide: Procedures for Environmental Review of Proposed Projects” (REF-5314.1). Compliance with applicable laws, regulations, and ~~standard~~ LAUSD Standard Conditions of Approval policies and practices during project construction and operation would ensure that impacts associated with the transport, use, and/or disposal of hazardous materials are less than significant.

5. Environmental Analysis

HAZARDS AND HAZARDOUS MATERIALS

Table 5.8-4 Modernization Projects Not Requiring OEHS Notification or Review

Category	Subcategory	Examples
Routine Activities Affecting the Interior of Structures	Carpentry	Wood trim, metal or plastic trim; wood and metal door systems; windows, including sash, transforms, wooden window frames or blinds; wood framing and paneling; cabinets/bookshelves; flooring, including ceramic tiles, linoleum, carpet, or hardwood floors; wood ramps, restroom partitions/hardware; room partition walls and doors; interior plaster; and drywall
	Electrical	Installation, repair, replacement and maintenance of electrical conveyances, debit card systems, fuses, wiring, light ballasts, electrical short circuits, exposed wires, broken or loose conduits, lenses on lights, clocks, battery back-up systems, electrical panels, old lighting/lamp fixtures, emergency egress lighting, permanent and temporary emergency lighting, bells systems, emergency egress lighting, circuit breakers, key switch, timed switches, light switches, stage dimmer boards, chandeliers, stage lighting, fire alarm systems, and remote power supplies
	Heating, Ventilating and Air Conditioning (HVAC)	Installation, repair, replacement and maintenance of steam boilers, hot water heating boilers, wall heaters, heating furnace, split air conditioning systems, window A/C systems, HVAC systems, gas heating or electrical cooling roof top units (3-10 tons), chillers, chilled and hot water heating lines, multi-zone A/C unit (15-60 tons) gas heating or hot water heating, HVAC system pneumatic controls, HVAC system electronic/electric controls, HVAC energy management control systems, shell and tube condensers, steam convectors, plate heat exchangers, A/C unit heat pumps, A/C unit wall mounts, A/C unit air and water balance, steam coils and traps, chilled and hot water coils, boiler fuel trains, boiler controls, and steam radiators or convectors
	Plumbing	Installation, repair, replacement and maintenance of bathroom fixtures (including toilets, urinals, lavatories, and floor drains), hose bibs, sumps and pumps, shut-off valves, gas pressure regulators, water pressure regulators, eye washers, storm drains and clarifiers, hydraulic hoists, hazardous waste drains and clarifiers, shower, sinks, faucets, drinking fountains, piping, earthquake valves, and seismic strapping
	Miscellaneous	Installation, repair, replacement and maintenance of auto shop hydraulic hoists, surface sump pumps, compressors for shop classes, dust collection equipment in shop classes, dust collection systems, exhaust systems and hoods, A/C ducting systems, ventilation louvers, gravity vents, lockers, A/C curb covers, bathroom mirror frames, hardware cloth for pest control, and metal shelving, and hoist and clarifier removals.
Routine Activities Affecting Exterior or Outdoor Areas	Exterior Building Façade Work	Installation, repair, replacement or maintenance of weather stripping on exterior doors, wood yard boxes, vandalized structures (repair or replacement), porch overhangs, skirting on portable buildings, window security grills, emergency exit grills, metal window frames, coiling counter doors, roof access hatches, sliding glass doors, skylights, handicap ramps and stairs, hand rails, rain gutters and downspouts, exterior stucco and paint
	Recreational Facilities (including athletic fields, gymnasiums, and playground areas)	Repair, replacement and/or maintenance of athletic field lighting, tennis/basketball court lighting, scoreboards, kick boards along fences and backstops, wood seating and foot rests on permanent interior or exterior bleachers, swimming pool grout, metal stadium bleachers (replacement must not exceed existing capacity), folding gymnasium bleachers, football training equipment, baseball back stops, playground matting, gymnasium basketball goals, and drain covers
	Landscaping	Installation, repair, replacement and maintenance of irrigation systems (including lawn sprinklers and sprinkler controls), trees, shrubs, and other vegetation
	Paving	Repair or resurfacing of existing paved areas, including asphalt parking lots, walkways, asphalt playgrounds, flag pole footing, and drainage facilities
	Miscellaneous	Installation, repair, replacement and/or maintenance of building signs, chain link fences/gates, and wrought iron fences/gates

Source: Memorandum from Angelo Bellomo, OEHS, to James McConnell, Facilities Services Division. "Activities Not Requiring OEHS Review," July 27, 2006.
Note: Certain projects still require OEHS review if they are on the Subsurface Notification Program list.

5. Environmental Analysis HAZARDS AND HAZARDOUS MATERIALS

IMPACT 5.8-2: SUP implementation would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials. [Threshold HAZ-2]

All SUP Projects

The SUP may require the use of hazardous materials in small quantities during construction and operation of new facilities, as explained in the discussion for Impact 5.8-1, above. The amount of hazardous materials that are handled at any one time would be relatively small, reducing the potential consequences of an accident during handling. Further, the District would continue to comply with federal and state laws and existing campus programs, practices, and procedures to eliminate or reduce the consequences of hazardous materials accidents. For example, staff and students who work around routinely used hazardous materials would continue to wear appropriate protective equipment, if necessary, and safety equipment would be available in all areas where hazardous materials are stored. Procedures are in place to ensure that appropriate warning signs and labels are affixed to hazardous chemicals and wastes; emergency wash stations, ventilation, and special plumbing are provided where needed; and adult supervision is maintained whenever students handle hazardous materials.

The consequences of spills as a result of a fall or dropping a container would depend on whether the hazardous material was released, the specific hazards associated with the material, the facility design, and the availability of emergency response equipment. In addition to health impacts associated with direct contact from an accidental spill, indirect impacts could occur. In areas without adequate ventilation, including partially enclosed outdoor areas (e.g., stairwells), vapors from released volatile materials could be trapped in stagnant air pockets and persons entering these areas could be subject to health hazards associated with inhalation of the vapors. In these instances, all individuals would be evacuated from the affected area until the vapors dissipated to safe levels, as determined by the Haz Mat Team and/or OEHS staff.

Some hazardous materials emergencies may require the further assistance of local police and/or fire department if they are significant (in terms of volume or area affected) or where the incident involves both fire and hazardous materials. In such events, school administrators would immediately contact the local emergency responders through the 911 emergency network. Procedures for the systematic evacuation of students from classrooms and other school facilities are established and practiced by the LAUSD at all schools through its SSP program, as explained in Section 5.8.1.4. Each school's SSP describes procedures to be followed in the event of a biological or chemical release.⁵⁸ Examples of chemical threats within or adjacent to schools include the discharge of acid in a school laboratory, an overturned truck of hazardous materials in proximity to a school, or an explosion at a nearby oil refinery or chemical plant.

Compliance with applicable laws, regulations, and ~~implementation of standard~~ LAUSD Standard Conditions of Approval policies and practices during project construction and operation would ensure that impacts associated with upset or accidental conditions which could cause a release of hazardous materials are less than significant.

⁵⁸ LAUSD OEHS Model Safe School Plan, Volume 2 – Emergency Procedures, revised June 5, 2003.

5. Environmental Analysis

HAZARDS AND HAZARDOUS MATERIALS

IMPACT 5.8-3: SUP-related projects would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substance, or waste within one-quarter mile of an existing or proposed school. [Threshold HAZ-3]

All SUP Projects

The SUP covers the entire school district and over 600 schools. Site-specific projects that would be implemented under the SUP would be school related and would not emit hazardous emissions or handle significant quantities of hazardous or acutely hazardous materials, substances, or waste. Hazardous materials expected at District schools would be associated with janitorial, maintenance, and repair activities. These materials would be used in small quantities and would be stored in compliance with established state and federal requirements. Additionally, if contaminants that could become airborne during demolition and hauling (ACM, LBP, or pesticides) are present on a specific site, they would be removed in accordance with DTSC and SCAQMD requirements prior to demolition activities. Therefore, emissions impacts from existing or proposed schools within one-quarter mile of other existing schools would be less than significant.

IMPACT 5.8-4: SUP-related projects may be located on a site which is included on a list of hazardous materials compiled pursuant to Government Code Section 65962.5 but would not create a significant hazard to the public or the environment. [Threshold HAZ-4]

The LAUSD currently operates more than 1,309 schools for grades K–12. None of these existing campuses is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. A total of 224 LAUSD schools are listed as School Investigation or School Cleanup Sites on the DTSC’s EnviroStor database (see Section 5.8.1.2). The listed sites are proposed and existing school properties where investigation and/or remedial activities are ongoing or have been completed under DTSC oversight. Most listings are school sites that were acquired or expanded for the District’s New School Construction Program.

In addition, approximately 166 LAUSD schools, administrative buildings, and maintenance facilities are listed as hazardous waste generators on the EPA RCRAInfo database (see Section 5.8.1.2). These schools and school facilities typically have disposed of small quantities of hazardous wastes in the past, such as chemicals from science, shop, and photography classes and waste generated during routine campus maintenance. Some schools may have undergone renovation or construction projects that resulted in the one-time generation of asbestos, polychlorinated biphenyl (PCB) waste, or contaminated soil. None of these database listings qualifies existing LAUSD school sites as hazardous materials sites pursuant to Government Code Section 65962.5.

New Construction on New Property

Various types of “listed” sites may be present on properties that may be acquired for expansion of school sites. In most cases, these sites will be active and historical facilities identified as hazardous waste generators or operators of USTs. For each proposed project that involves new property acquisition, the District would consult specified comprehensive lists of contaminated sites to determine whether the proposed site contains hazardous materials consistent with Government Code Section 65962.5. Where a site proposed for acquisition is identified on one of the lists, the District would, through the site assessment and CEQA processes, consider whether the site’s hazardous materials pose a significant threat to students or staff.

5. Environmental Analysis HAZARDS AND HAZARDOUS MATERIALS

Under Education Code Section 17213(a), the District is prohibited from acquiring any current or former hazardous waste disposal site or solid waste disposal site unless the site is a former solid waste disposal site and the wastes have been removed; any hazardous substance release site identified by DTSC in a current list adopted under Health & Safety Code Section 25356 for a removal or remedial action pursuant to Health & Safety Code Sections 25300, *et seq.*; or any site containing pipelines carrying hazardous substances or hazardous wastes, unless the pipeline is a natural gas line used only to supply natural gas to the school or neighborhood. In order to comply with this requirement, the OEHS would investigate the possible presence of hazardous materials for each acquisition and construction project through a Phase I ESA and, if necessary, a Phase II assessment/PEA. If the property would be acquired using state bond funds, environmental investigation, assessment and remediation, if any, would be conducted under DTSC ~~supervision~~oversight. The LAUSD would incorporate information regarding site investigations in the environmental review document it prepares for a specific project, which would be available to the public for review and comment as required by CEQA. The public would then have the opportunity to review the site-specific investigations through the public review process.

In addition, if the LAUSD's investigation identifies a significant disposal of hazardous waste on or within 2,000 feet of a proposed school site, CCR Title 5, Section 14010(t), requires the District to contact the DTSC for a determination as to whether the property should be considered a Hazardous Waste Property or Border Zone Property. Upon notification, the DTSC must evaluate available information about site conditions and consider whether to impose a deed restriction on the property that would prevent, among other land uses, schools for persons under the age of 21 ~~(H&SC Section 25220 et seq.)~~.⁵⁹

The LAUSD would ensure that any new property acquired for new construction undergoes a site assessment in compliance with applicable laws and regulations regarding site acquisition for new school construction, as outlined above. These procedures would ensure that any listed hazardous materials sites are identified and proper response measures are taken, including any necessary investigation and remedial actions. These steps would ensure that impacts associated with hazardous materials listed sites would be less than significant.

New Construction and Modernization on Existing Campus

New construction, modernization, repair, replacement, upgrade, remodel, renovation and installation projects would not involve the acquisition or leasing of new properties for school construction. Therefore, because no existing LAUSD school is currently included on a list of hazardous materials sites, no evaluation would be needed to determine whether the new project site is included on such a list and no impact would occur.

Compliance with applicable laws, regulations, and implementation of LAUSD Standard Conditions of Approval ~~standard policies and practices~~ would ensure that hazardous materials sites on or in the vicinity of a project site are identified and proper response measures are taken prior to site acquisition and project construction. Therefore, impacts would be less than significant.

⁵⁹ California Hazardous Waste Control Law, Section 25220 et seq.

5. Environmental Analysis

HAZARDS AND HAZARDOUS MATERIALS

Impact 5.8-5: SUP-related projects would not result in an airport safety hazard for people residing or working in the project area. [Threshold HAZ-5]

New construction and modernization projects pursuant to the SUP could be undertaken on expanded or existing campuses within the vicinity of an existing airport. As explained in Section 5.8.1.3, three airports are within the City of Los Angeles (Los Angeles International Airport, Van Nuys Airport, and Whiteman Airport), and two other airports are near District boundaries (Bob Hope Airport and Santa Monica Airport). Only six existing LAUSD schools are within the influence areas of these airports, as identified in the relevant Airport Land Use Plans (ALUPs). Therefore, very few, if any, new construction and modernization projects under the SUP would likely be conducted on properties that are within the jurisdiction of an ALUP. Any such projects would only be undertaken after consultation with the airport and in a manner that does not conflict with the ALUP.

All SUP Projects

Several existing District schools are within two nautical miles of the aforementioned airports. However, projects conducted on existing campuses that do not involve acquisition of new property would not need to be reviewed for airport safety or noise. It should also be noted that Education Code Section 17215 does not apply to school sites acquired prior to January 1, 1966, nor to any additions or extensions to those sites. Therefore, no impacts would occur.

Per Education Code Section 17215, the District must receive approval from the CDE and California Department of Transportation before acquiring title to property for a new school site if the proposed site is within 2 nautical miles of an airport runway. The consideration of a proposed site in relation to airports is part of the District's CCR Title 5 and CEQA site review procedures. By following these procedures and state regulations, impacts associated with airport hazards would be less than significant.

Impact 5.8-6: SUP-related projects would not result in a private airstrip safety hazard for people residing or working in the project area. [Threshold HAZ-6]

All SUP Projects

As indicated in Section 5.8.1.3, there are 74 private-use heliports in the 12 cities within or mostly in the District, including 69 in the City of Los Angeles. New construction and modernization projects on existing campuses would not create any new safety hazards associated with heliport operations. If heliports are close to any new property acquired for a school site, its operations would be reviewed by the District to determine if they present any unusual safety, noise, or pollution concerns for students and staff at the new property. Any concerns would be addressed and mitigated through the project-specific CEQA evaluation process.

The Federal Aviation Administration (FAA) and many state and local governments use great caution and apply strict safety standards to reduce safety risks associated with air traffic at heliports and private airports, especially unsafe actions by pilots and improper facilities. The FAA evaluated the risk to individuals residing within 1 mile of a heliport, or so-called "neighborhood risk," and concluded that for heliports that support 400 annual helicopter missions, the average likelihood of an accident over the surrounding neighborhood is

5. Environmental Analysis

HAZARDS AND HAZARDOUS MATERIALS

one accident in 495 years.⁶⁰ When coupled with the additionally remote probability that anyone on the ground is injured if/when an accident does occur, a heliport and its associated operations are statistically a very low risk to neighborhood residents and property. Therefore, the probability of an accident involving school activities and nearby heliports is considered unlikely, and impacts are judged to be less than significant.

Impact 5.8-7: The SUP would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. [Threshold HAZ-7]

All SUP Projects

Major hazardous materials accidents are extremely infrequent, and additional emergency response capabilities are not anticipated to be necessary to respond to the potential incremental increase in the number of incidents that could occur from implementation of the SUP. Individual projects constructed under the SUP would conform to applicable local ordinances that deal with emergency response and evacuation, would allow for adequate emergency access, and would be designed to be compliant with adopted emergency response plans and emergency evacuation plans. All construction, modernization, and repair work would be conducted within existing LAUSD campuses or newly acquired property and would not impede emergency access into communities surrounding District schools. During construction, emergency response procedures would be governed by the District's emergency response protocol and the contractor's emergency response plan (see Section 5.8.1.4). Upon project completion, District-wide emergency response plans, policies, and guidance developed by the LAUSD would be extended to include the new project. In particular, the LAUSD has developed a district-wide Emergency Operations Plan that assigns responsibilities and provides a framework for coordination of response and recovery efforts in the event of an emergency.⁶¹ Additionally, pursuant to Education Code Section 32286(a), all new school campuses must adopt a comprehensive school safety plan (SSP) within one year of initiating operation, which must be reviewed and updated by March 1 of every year thereafter. The LAUSD-OEHS has developed the Model Safe School Plan⁶² for use as a template in the preparation of SSPs for each of the District's schools. Volume 2 – Emergency Procedures, deals with emergency preparedness and response and is based on the California Standardized Emergency Management System (SEMS), which is designed to centralize, organize, and coordinate emergency response between the District and various public agencies. School administrators can download a copy of the Model Safe School Plan template from the District's website to use in preparing their SSPs. With these District guidelines and standard conditions in place, a site-specific SSP would be prepared for any new school, and existing SSPs, which are updated annually, would be modified to reflect changed conditions as the result of any new construction or modifications that have occurred on their campuses.

Public schools are considered critical community facilities and are often used as evacuation centers during disasters. State design and construction standards for critical facilities such as schools and hospitals are more

⁶⁰ US Department of Transportation Federal Aviation Administration, "Analysis of Helicopter Accident Risk Exposure Near Heliports, Airports, and Unimproved Sites," R.J. Adams et.al, Publication No. DOT/FAA/RD-90/9, February 1992. <http://oai.dtic.mil/oai/oai?verb=getRecord&metadataPrefix=html&identifier=ADA249127>.

⁶¹ LAUSD Emergency Operations Plan, Updated April 2010.

⁶² LAUSD-OEHS, Model Safe School Plan, A Template for Ensuring a Safe, Healthy and Productive Learning Environment, Revised June 5, 2003. http://notebook.lausd.net/portal/page?_pageid=33,1095525&_dad=ptl&_schema=PTL_EP

5. Environmental Analysis

HAZARDS AND HAZARDOUS MATERIALS

rigorous than those for many other types of structures; thus, public schools are more likely than some other types of structures to be safely used and occupied after a disaster such as a strong earthquake. New construction, modernization, and repair work conducted pursuant to the SUP would have a favorable impact on emergency response by making improvements to schools that would comply with current, stringent seismic standards and that could be used as evacuation centers in the event of a disaster.

New school construction and modernization projects would conform to local ordinances and would not interfere with an existing emergency response or evacuation plan. New projects also would conform to the District's emergency response plans and protocol during construction and operation. Impacts associated with implementation of or interference with adopted emergency response plans and emergency evacuation plans would be less than significant.

Impact 5.8-8: The SUP would not expose people or structures to a significant risk of loss, injury or death involving wildland fires. [Threshold HAZ-8]

All SUP Projects

The majority of the area within the District boundaries does not contain dense vegetation (flammable brush) considered to be wildlands. For most of the District, areas containing flammable brush, grass, or trees are not close to existing or potential school sites.

Any new construction or modification to District campuses that occurs within a designated Fire Hazard Severity Zone would comply with applicable building and fire code requirements, including Chapter 7A of the California Building Code, "Materials and Construction Methods for Exterior Wildfire Exposure," and Chapter 49 of the California Fire Code, "Requirements for Wildland-Urban Interface Fire Areas." All Fire Hazard Severity Zones in the District are considered to be within wildland-urban interface fire areas.

Compliance with these existing regulatory requirements and building codes would ensure that any new school construction or modernization project would not expose people or structures to a significant risk involving wildland fires. Impacts from wildland fires would be less than significant.

Impact 5.8-9: SUP-related project sites are not anticipated to contain a current or former hazardous waste disposal site or solid waste disposal site; if they do contain a former solid waste disposal site, wastes would be removed. [Threshold HAZ-9]

New Construction on New Property

Under Education Code Section 17213(a)(1), the District is prohibited from acquiring any current or former hazardous waste disposal site or solid waste disposal site unless the site is a former solid waste disposal site and the wastes have been removed. For each proposed project that involves new property acquisition, the District would consult specified comprehensive lists of contaminated sites, including the DTSC EnviroStor and SWRCB GeoTracker databases, to determine whether the proposed site is a current or former hazardous waste disposal site or solid waste disposal site. This review would be performed as part of the District's site assessment process, which would include the preparation of a Phase I ESA and, if necessary, a Phase II

5. Environmental Analysis HAZARDS AND HAZARDOUS MATERIALS

assessment/PEA. If the property is to be acquired using state bond funds, these environmental assessments would be conducted under DTSC supervision. Where a proposed school site is identified on one of the lists, the District would, through the site assessment and CEQA processes, determine whether the site is a current or former hazardous waste disposal site or solid waste site. The District would not select the site if it is a current or former hazardous waste disposal site, or if it is a current solid waste site. The District would consider a former solid waste site for a proposed school project only if the wastes have been removed and the District determines that the site poses no significant health risk to students, staff and faculty, and no significant risk of harm to the environment. The public would then have the opportunity to review the site-specific investigations through the public review process. LAUSD will comply with the process described in this section to reduce risks from current or former hazardous waste disposal site or solid waste disposal site. Impacts would be less than significant.

New Construction and Modernization on Existing Campus

New construction, modernization, repair, replacement, upgrade, remodel, renovation and installation projects would not involve the acquisition or leasing of new properties for school construction. Therefore, because no existing LAUSD school contains a current or former hazardous waste disposal site or solid waste disposal site, no evaluation would be needed to determine whether the new project site is included on such a list, and no impact would occur.

Impact 5.8-10: SUP-related project sites may be located on a hazardous substance release site that DTSC previously listed under Health & Safety Code Section 25356 for removal or remedial action so long as all response actions are taken and DTSC certifies the school may be occupied. [Threshold HAZ-10]

New Construction on New Property

Under Education Code Section 17213(a)(2), the District is prohibited from acquiring property that is a hazardous substance release site identified by the DTSC in a current list adopted pursuant to Health & Safety Code Section 25356 for removal or remedial action under Health & Safety Code Sections 25300, *et seq.* For each proposed project that involves new property acquisition, the District would consult specified comprehensive lists of contaminated sites, including the DTSC EnviroStor and SWRCB GeoTracker databases, to determine whether the proposed site is so listed by DTSC. This review would be performed as part of the District's site assessment process, which would include the preparation of a Phase I ESA and, if necessary, a Phase II assessment/PEA and remediation. If the property is to be acquired using state bond funds, these environmental assessment activities would be conducted under DTSC supervision. Where a proposed school site is listed by DTSC under Health & Safety Code Section 25356, the District would, through the site assessment and CEQA processes and under DTSC's oversight, undertake all required removal and/or remedial actions, ensure that DTSC removes the site from this listing, determine that the site as remediated poses no significant health risk to students, faculty and staff and secure DTSC's certification that all school buildings may be occupied and used for their intended purpose. The public would then have the opportunity to review the site-specific investigations through the public review process. Compliance with the process and steps outlined in this paragraph would ensure that impacts from any site used for a school

5. Environmental Analysis

HAZARDS AND HAZARDOUS MATERIALS

project that DTSC formerly listed under Section 25356 would not be a hazard to people on or near the site. Impacts related to hazardous substance release site would be less than significant.

New Construction and Modernization on Existing Campus

These types of projects would not involve the acquisition or leasing of new properties for school construction. Therefore, because no existing LAUSD school contains a current or former hazardous or solid waste disposal site, no evaluation would be needed to determine whether the new project site is included on such a list and no impact would occur.

Impact 5.8-11: SUP-related project sites would not contain one or more pipelines, situated underground or aboveground, that carry hazardous substances, extremely hazardous substances, or hazardous wastes. [Threshold HAZ-11]

New Construction on New Property

Under Education Code Section 17213(a)(3) the District is prohibited from acquiring any property that contains one or more underground or aboveground pipelines that carry hazardous substances, extremely hazardous substances or hazardous wastes. Natural gas distribution lines that serve the school or a neighborhood are specifically excluded from the definition of pipelines subject to this state law. In order to comply with this and other state laws and regulations related to hazardous material pipelines, the District would investigate the possible presence of such pipelines for each new school site acquisition and construction project as a component of its normal site assessment process. The District would incorporate information regarding site investigations in the environmental review document it prepares for a specific project, which would be available to the public for review and comment as required by CEQA. The public would then have the opportunity to review the site-specific investigations through the public review process.

The LAUSD-OEHS has developed a “User Manual Pipeline Safety Hazard Assessment” and CEQA Specification Manual Pipeline Safety Hazard Analysis (SC-HAZ-2) with a specific protocol for the evaluation of hazardous materials pipelines within 1,500 feet of a school site.^{63,64} The manual provides instructions for completing a pipeline safety hazard assessment (PSHA) for natural gas, hazardous liquid, and high-volume water pipelines for one or more of the following cases:

- High pressure natural gas, petroleum product, crude oil and chemical pipelines that lie within 1,500 feet of proposed or existing school sites.
- High pressure natural gas, petroleum product, crude oil and chemical pipelines crossing or located within railroad easements that lie within 1,500 feet of proposed or existing school sites.
- Crude oil and natural gas gathering lines associated with active oil well sites that are less than 300 feet from proposed or existing school sites.

⁶³ LAUSD OEHS User Manual Pipeline Safety Hazard Assessment, revised October 2008.

⁶⁴ LAUSD OEHS CEQA Specification Manual, Appendix L, Pipeline Safety Hazard Analysis. December 2005, Revised June 2007

5. Environmental Analysis HAZARDS AND HAZARDOUS MATERIALS

- High-volume water pipelines that lie within 1,500 feet of proposed or existing school sites.

Briefly stated, the screening method uses hazard footprint look-up tables to compare hazard footprint length with distance from the pipeline to the school. If a hazard footprint reaches the proposed school property line, then a quantitative risk analysis is completed. If no hazard footprint reaches the school site, then the screening analysis is complete. If PSHA results indicate that risk from a safety hazard is significant (i.e., risk equals or exceeds a threshold level of one in one million [1.0×10^{-6}]), then the District can identify and develop mitigation measures that may reduce predicted fatality risk to be within acceptable limits.

The CDE has also developed and published guidance procedures for evaluating safety hazards associated with natural gas and hazardous liquid releases from underground and aboveground pipelines, as well as flooding associated with releases from large-diameter water pipelines.⁶⁵ This guidance would also be followed to assess potential pipeline hazards in the vicinity of a proposed school site. The identification and evaluation of possible hazardous material pipelines on or within 1,500 feet of a proposed school site in accordance with LAUSD Standard Conditions and CDE assessment procedures would ensure that measures are taken to reduce impacts associated with such pipelines. Pipeline risk reduction measures include, but are not limited to, the following:

- Develop and implement emergency response procedures allowing students and staff to shelter in place inside the school.
- Install or develop warning systems to improve evacuation time.
- Provide staff with safety training and develop better communication and coordination with emergency response personnel.
- Require that a school be notified of any third party construction near an existing pipeline.
- Establish emergency telephone communication with school office.

Hazard impacts associated with hazardous substances or materials, or hazardous waste pipelines would be less than significant.

New Construction and Modernization on Existing Campus

Depending on the size and nature of the new construction or modernization project, the District may elect to conduct a PSHA, as described above. If so, it would be conducted in the same manner and with the same thoroughness as those studies conducted for site acquisition. If state funding is sought, the District would self-certify that the project will not create any new significant safety hazards or exacerbate any existing safety hazards to students with respect to pipelines when filing the application and Form SFPD 4.08 with the CDE.

⁶⁵ CDE Guidance Protocol for School Site Pipeline Risk Analysis, prepared by URS Corporation, 2007.

5. Environmental Analysis

HAZARDS AND HAZARDOUS MATERIALS

Compliance with these requirements outlined above would ensure that any new school construction or modernization project would not expose people or structures to a significant risk involving their proximity to aboveground or underground pipelines. Therefore, impacts from such pipelines would be less than significant.

5.8.4 Applicable Regulations and Standard Conditions

Federal

- United States Code Title 15, Sections 2601 et seq.: Toxic Substances Control Act
- United States Code Title 42, Sections 9601 et seq.: Comprehensive Environmental Response, Compensation and Liability Act and Superfund Amendments and Reauthorization Act
- United States Code Title 42, Sections 6901 et seq.: Resource Conservation and Recovery Act
- United States Code Title 42, Sections 11001 et seq.: Emergency Planning & Community Right to Know Act
- Code of Federal Regulations Title 29, Part 1910: Occupational Health and Safety Administration Standards
- Code of Federal Regulations Title 40, Parts 260-265: Hazardous Waste Management
- Code of Federal Regulations Title 40, Part 136: Guidelines Establishing Test Procedures for the Analysis of Pollutants
- Code of Federal Regulations Title 40, Parts 700-766: Implementing Regulations for the Toxic Substances Control Act (including asbestos and PCBs)
- Code of Federal Regulations Title 49, Parts 170-179: DOT Hazardous Materials Regulations
- Code of Federal Regulations Title 49, Parts 190-198: DOT Pipeline Safety Regulations

State

Numerous CDE procedures are listed and referenced throughout this chapter of the EIR. To the extent that they may be applicable to a new school construction and/or modernization project, they are included herein as standard conditions. Those of particular importance or relevance are itemized below:

- CDE School Site Selection and Approval Guide, 2004
- CDE Guidance Protocol for School Site Pipeline Risk Analysis, prepared by URS Corporation, 2007.

5. Environmental Analysis HAZARDS AND HAZARDOUS MATERIALS

- California Education Code Title 1, Division 1, Part 10, Chapter 12.5, Section 17070 et seq.: Leroy F. Greene School Facilities Act of 1998
- California Education Code Title 1, Division 1, Part 10.5, Chapter 1, Sections 17210, 17213, and 17215: Schoolsites. General Provisions
- California Education Code Title 1, Division 1, Part 10.5, Chapter 3, Sections 17251 and 17268: Construction of School Buildings
- California Education Code Title 1, Division 1, Part 19, Chapter 2.5, Sections 32280-32289: School Safety Plans
- California Health and Safety Code, Division 20, Chapter 6.5: Hazardous Waste Control
- California Health and Safety Code, Division 20, Chapter 6.95: Hazardous Materials Release Response Plans and Inventory
- California Code of Regulations Title 5, Division 1 Chapter 13, Subchapter 1: School Facilities Construction (Title 5 requirements)
- California Code of Regulations Title 21, Division 2.5, Chapter 2.1, Section 3570: Caltrans School Site Evaluation Criteria (for airports)
- ~~California Code of Regulations Title 22, Division 4: Environmental Health~~
- California Code of Regulations Title 22, Division 4.5: Environmental Health Standards for the Management of Hazardous Waste

LAUSD Standard Conditions of Approval

Numerous LAUSD Standard Conditions are listed and referenced throughout this chapter of the EIR. ~~To the extent that they may be applicable to a new school construction or modernization project, they are included herein as standard conditions.~~ Those of particular importance or relevance are itemized below.:

- LAUSD OEHS CEQA Specification Manual, Appendix M, Criteria for School Siting in Proximity to High Voltage Power Lines. December 2005, Revised June 2007. Board of Education resolutions: Effects of Non-Ionizing Radiation-2000; Wireless Telecommunication Installations-2009; T Mobile Cell Tower Notification and Condemnation-2009 (SC-HAZ-1)
- LAUSD OEHS CEQA Specification Manual, Appendix L, Pipeline Safety Hazard Analysis. December 2005, Revised June 2007 (SC-HAZ-2)

5. Environmental Analysis

HAZARDS AND HAZARDOUS MATERIALS

- LAUSD OEHS CEQA Specification Manual, Appendix K, Rail Safety Study. December 2005, Revised June 2007. (SC-HAZ-3)
- LAUSD OEHS CEQA Specification Manual, Appendix J, Air Toxics Health Risk Assessment (HRA). December 2005, Revised June 2007. (SC-HAZ-4)
- LAUSD-OEHS Policy Bulletin: Procedures for Modifications and Additions to District Property Funded by or Performed by a Third Party, BUL-5761.0, May 14, 2012
- LAUSD-OEHS Phase I Environmental Site Assessment: Standard Scope of Work, June 2007
- LAUSD Section 01 4524 – Environmental Import/Export Materials Testing, October 1, 2011
- LAUSD-OEHS Safety Alert No. 03-02: Procedures – Responding to Toxic Air Emissions, February 2003
- LAUSD Board Resolution: Siting of New Schools Near Industrial Facilities, February 22, 2005
- LAUSD-OEHS Memorandum: Industrial Facilities in Proximity to Schools, MEM-1611, March 4, 2005
- LAUSD-OEHS User Manual Pipeline Safety Hazard Assessment, October 2008
- LAUSD-OEHS Reference Guide: Environmental Hazards in Proximity to Schools, REF-5892.0, October 8, 2012
- LAUSD-OEHS Procedures: Review of Non-District Projects to Determine Impact on Schools, undated draft
- LAUSD-OEHS Safety Alert No. 04-08: Emergency Preparedness – Recommendations for Parents, Teachers, and School Administrators, August 2004
- LAUSD-OEHS Reference Guide: Emergency Drills and Procedures, REF-1314.1, January 13, 2009
- LAUSD Existing Facilities – Construction Safety, SAF:30, March 2, 2007
- LAUSD Emergency Operations Plan, updated April 2010
- LAUSD Bulletin: Use of School Facilities in an Emergency or Disaster Situation, BUL-2450.1, December 23, 2009
- LAUSD-OEHS Model Safe School Plan, A Template for Ensuring a Safe, Healthy and Productive Learning Environment, Volume 2 – Emergency Procedures, revised June 5, 2003

5. Environmental Analysis HAZARDS AND HAZARDOUS MATERIALS

- LAUSD Office of School Operations Reference Guide: Safe School Plans Update for 2009-2010, REF-1242.6, August 21, 2009
- LAUSD Bulletin: District Emergency Response and Preparedness, BUL-5433.0, March 30, 2011
- LAUSD Reference Guide: School Site Emergency/Disaster Supplies, REF-5451.0, April 12, 2011
- LAUSD Reference Guide: Safe School Plans Update for 2011-2012, REF-5511.0, July 1, 2011
- LAUSD-OEHS Reference Guide: Emergency Response and Communication Procedures for the Release of Areas Closed Due to Emergency Incidents, REF-5741.0, April 23, 2012
- LAUSD-OEHS Emergency Response Communications and Response Actions, 2012
- LAUSD-OEHS Reference Guide: Methane Safety Program Implementation Guidelines, REF-5671.0, January 9, 2012
- LAUSD Non-School Facility Site Disaster Plan, undated
- LAUSD-OEHS Safety Alert No. 02-03: Chemical Handling Safety Procedures for Schools, March 2002
- LAUSD-OEHS Safety Alert No. 03-08: Mercury Hazards, May 2003
- LAUSD Section 13614 – Abatement of Hazardous Materials, July 7, 2003
- LAUSD-OEHS School Laboratory Chemical Hygiene & Safety Plan, January 2005
- LAUSD-OEHS Safety Alert No. 05-08: Discharge of Photographic Chemicals into Sewers, June 2005
- LAUSD-OEHS Safety Alert No. 05-03: Approval of Chemical Products for District Use, April 21, 2006
- LAUSD-OEHS Safe School Inspection Guidebook, June 2013
- LAUSD-OEHS Hazard Communication Plan – Your Right to Know, November 2013
- LAUSD-OEHS Safety Alert No. 14-01: Hazard Communication, January 2014
- LAUSD-OEHS Safety Alert No. 14-03: Warning Signs for California Proposition 65, January 2014
- LAUSD-OEHS Safety Alert No. 03-11: Procedures – Disposal of Electronic Devices, April 29, 2005
- LAUSD-OEHS Hazardous Waste Management Procedures for Maintenance and Operations and Garages, March 22, 2007

5. Environmental Analysis

HAZARDS AND HAZARDOUS MATERIALS

- LAUSD-OEHS Reference Guide: Disposal Procedures for Hazardous Waste and Universal Waste, REF-4149.0, February 26, 2008
- LAUSD-OEHS Memorandum: End-of-School-Year Hazardous Waste Pick-Up, MEM-5779.0, June 11, 2012
- LAUSD-OEHS Safety Alert No. 02-08: Modifications to Asbestos Containing Materials, December 2002
- LAUSD-OEHS Safety Alert No. 03-10: Preventing Lead Exposure During Construction & Renovation, May 2003
- LAUSD Section 13280 – Asbestos Abatement and Asbestos Related Disturbance, November 21, 2003
- LAUSD-OEHS Safety Alert No. 05-10: Modifications to Building Materials Containing Asbestos or Lead, August 2005
- LAUSD Section 13282 – Lead Abatement and Lead Related Construction Work, March 15, 2007
- LAUSD-OEHS Safety Alert No. 12-02: Asbestos Warning Signs, April 2012
- LAUSD Facilities School Maintenance and Operations Repair & Construction Safety Standards, February 28, 2013.
- LAUSD-OEHS Reference Guide: Daily Flushing Requirements for Drinking Fountains and Faucets, REF-3930.4, August 26, 2013.

5.8.5 Level of Significance Before Mitigation

Upon implementation of regulatory requirements and LAUSD Standard Conditions listed above, the following impacts would be less than significant: Impacts 5.8-1, 5.8-2, 5.8-3, 5.8-4, 5.8-5, 5.8-6, 5.8-7, 5.8-8, 5.8-9, 5.8-10, and 5.8-11.

5.8.6 Mitigation Measures

No mitigation measures are required.

5.8.7 Level of Significance After Mitigation

Impacts would be less than significant.

5. Environmental Analysis

5.9 HYDROLOGY AND WATER QUALITY

This section of the EIR evaluates the potential for implementation of the SUP to impact hydrology and water quality (surface and groundwater) in the District. This section discusses regulatory framework (plans and policies from several jurisdictional agencies and LAUSD Standard Conditions)~~plans and policies from several jurisdictional agencies and LAUSD standard conditions, guidelines, specifications, practices, policies, and project design features (LAUSD Standards)~~, along with the existing hydrology and water quality issues throughout the SUP area, and possible environmental impacts that may occur as SUP-related site-specific projects are implemented~~during future phases of the SUP and site specific projects implemented under the SUP~~.

TERMINOLOGY

Hydrology. The distribution and circulation of water, both on land and underground.

Surface Water. Water on the surface of the land and includes lakes, rivers, streams, and creeks.

Groundwater. Water below the surface of the earth.

Water Quality. The chemical, biological or physical characteristics of surface or groundwater.

Water Quality Standard. The foundation of the water quality-based control program mandated by the Clean Water Act. In the setting of standards, agencies make political and technical/scientific decisions about how the water will be used

Pollutant. The term broadly includes any type of industrial, municipal, and agricultural waste discharged into water. Examples of pollutants include, but are not limited to, rock, sand, dirt, and agricultural, industrial, and municipal waste.

Point sources. Discharges from publicly owned treatment works (POTWs), discharges from industrial facilities, and discharges associated with urban runoff in discrete conveyances such as pipes or man-made ditches.

Total Maximum Daily Load. A TMDL is a calculation of the maximum amount of a pollutant that a water body can receive and still meet water quality standards, and an allocation of that load among the various sources of that pollutant.

One-Hundred Year Flood. The term “one-hundred year flood” is used in an attempt to simplify the definition of a flood that statistically has a one percent chance of occurring in any given year. The 100-year flood is also referred to as the one-percent flood, since its annual exceedance probability is one percent. Based on historical data about rainfall and stream stage this extreme hydrologic event is a flood having a 100-year recurrence interval.

Seiche. A surface wave created when an inland body of water is shaken, usually by earthquake activity. Seiches could pose flood hazards due to a wave overtopping an aboveground reservoir, or percolation basins.

5. Environmental Analysis

HYDROLOGY AND WATER QUALITY

Mudflow. A type of landslide composed of saturated rock debris and soil with a consistency of wet cement. Areas that could be subject to mudflows are at the bases of foothills and mountains; canyons and areas immediately below the mouths of canyons; and washes.

Tsunami. A tsunami is a very high, large wave in the ocean that is usually caused by an earthquake or volcanic eruption under the sea.

5.9.1 Environmental Setting

5.9.1.1 REGULATORY FRAMEWORK

National, State, regional and local laws, regulations, plans, and guidelines are summarized below. The following regulatory framework discussion does not include all plans and policies that relate to hydrology and water quality 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 date when a proposed site-specific school project undergoes review. Therefore, this section provides a general discussion of the most important plans and policies that apply to SUP-related projects. Although some of these may not directly apply to the SUP or site-specific projects implemented under the SUP, they are included to assist in identifying potential impacts and significance thresholds. Applicable LAUSD Standard Conditions of Approvals are also listed. See *Applicable Regulations and Standard Conditions* at end of this chapter for those that require District compliance.

Federal

United States Code, Title 33, Sections 1251 et seq. (1972)

The **Clean Water Act** (CWA) (also known as the federal Water Pollution Control Act) is the principal statute governing water quality. The CWA establishes the basic structure for regulating discharges of pollutants into the waters of the United States and gives the United State Environmental Protection Agency (EPA) the authority to implement pollution control programs, such as setting wastewater standards for industry. The statute's goal is to end all discharges entirely and to restore, maintain, and preserve the integrity of the nation's waters. The CWA regulates both the direct and indirect discharge of pollutants into the nation's waters. The CWA sets water quality standards for all contaminants in surface waters and makes it unlawful for any person to discharge any pollutant from a point source into navigable waters unless a permit is obtained under its provisions. The CWA mandates permits for wastewater and storm water discharges, requires states to establish site-specific water quality standards for navigable bodies of water, and regulates other activities that affect water quality, such as dredging and the filling of wetlands. The CWA also funded the construction of sewage treatment plants and recognized the need for planning to address non-point sources of pollution (e.g., storm water runoff).

Section 401 of the CWA states that any applicant for a federal license or permit to conduct any activity including, but not limited to, the construction or operation of facilities that may result in any discharge to navigable waters shall provide the licensing or permitting agency a certification from the state in which the

5. Environmental Analysis HYDROLOGY AND WATER QUALITY

discharge originates or would originate, or, if appropriate, from the interstate water pollution control agency having jurisdiction over the navigable water at the point where the discharge originates or would originate, that any such discharge would comply with the applicable provisions of Sections 301, 302, 303, 306, and 307 of the Clean Water Act. This State certification is referred to as “Section 401 Water Quality Certification.” In California, the nine Regional Water Quality Control Boards (RWQCBs) administer Section 401 certification.

Section 402(p) of the CWA establishes a framework for regulating municipal and industrial storm water discharges under the National Pollutant Discharge Elimination System (NPDES) Program. EPA NPDES regulations require, among other things, that discharges of storm water to waters of the United States from construction projects that encompass one or more acres of soil disturbance comply with an NPDES Permit.¹

Section 404 of the CWA authorizes the US Army Corps of Engineers (Corps) to regulate the discharge of dredged or fill material within the waters of the United States and adjacent wetlands. Most watercourses within the United States, including those within the LAUSD boundary, qualify as waters of the United States. Nationwide 404 permits are available in certain cases to streamline the 404 process. For instance, Nationwide Permit #39, “Residential, Commercial and Institutional Developments,” could apply to school construction provided the impacts to waters of the United States are a half acre or less and involve less than 300 linear feet of stream. Notification of the Corps is required. Mitigation for impacts may also be required.

United States Code, Title 42, Sections 4001 et seq.

The **National Flood Insurance Act of 1968 and the Flood Disaster Protection Act of 1973** mandate the Federal Emergency Management Agency (FEMA) to evaluate flood hazards. FEMA administers the National Flood Insurance Program (NFIP) to provide subsidized flood insurance to communities that comply with FEMA regulations limiting development in floodplains. FEMA also issues Flood Insurance Rate Maps (FIRMs) that identify which land areas are subject to flooding. These maps provide flood information and identify flood hazard zones in the community. The design standard for flood protection is established by FEMA. FEMA’s minimum level of flood protection for new development is the 100-year flood event, also described as a flood that has a 1-in-100 chance of occurring in any given year.

Minimum NFIP floodplain management building requirements are applicable to some properties in the SUP Area per Volume 44 Code of Federal Regulations, Sections 59 through 65. As required by these regulations, all buildings constructed within a riverine floodplain (i.e., Flood Zones A, AO, AH, AE, and A1 through A30, as delineated on the FIRM) must be elevated so that the lowest floor is at or above the base flood elevation level in accordance with the effective FIRM. Also, if the area of construction is within a Regulatory Floodway delineated on the FIRM, any development must not increase base flood elevation levels. The term “development” is defined by FEMA as any man-made change to improved or unimproved real estate, including but not limited to buildings, other structures, mining, dredging, filling, grading, paving, excavation or drilling operations, and storage of equipment or materials. Per these regulations, if development in these areas occurs, a hydrologic and hydraulic analysis must be performed prior to the start of development and must demonstrate that the development does not cause any rise in base flood elevation levels, since no rise is permitted within regulatory floodways.

¹ 33 U.S.C. 1251-1387.

5. Environmental Analysis

HYDROLOGY AND WATER QUALITY

All buildings constructed within a coastal high hazard area, defined as any of the “V” Flood Zones as delineated on the FIRM, must be elevated on pilings and columns so that the lowest horizontal structural member, excluding the pilings and columns, is elevated to or above the base flood elevation level. In addition, the posts and pilings foundation and the structure attached thereto must be anchored to resist flotation, collapse, and lateral movement due to the effects of wind and water loads acting simultaneously on all building components.

Upon completion of any development that changes existing Special Flood Hazard Areas, the NFIP directs all participating communities to submit the appropriate hydrologic and hydraulic data to FEMA for a FIRM revision, as soon as practicable, but not later than six months after such data becomes available.

Local Floodplain Development Requirements

In order to participate in the National Flood Insurance Program, pursuant to the Flood Disaster Protection Act of 1973, local jurisdictions, including cities and counties, must enact floodplain development regulations. These regulations generally prohibit development within a floodplain unless the lowest floor of the structure is above the predicted flood level. Some flood-prone areas, known as floodways, are set aside specifically for the conveyance of flood flows, and development in these areas is prohibited or severely restricted. Los Angeles County, the City of Los Angeles, and most other cities have floodplain and water quality regulations for new development.

Code of Federal Regulations, Title 40, Parts 122 et seq.

National Pollution Discharge Elimination System (NPDES) regulations are issued by the U.S. Environmental Protection Agency (EPA) for implementation of requirements of the Clean Water Act (US Code, Title 33, Sections 1342 et seq.). The term pollutant broadly includes any type of industrial, municipal, and agricultural waste discharged into water. Point sources are discharges from publicly owned treatment works (POTWs), discharges from industrial facilities, and discharges associated with urban runoff. While the NPDES program addresses certain specific types of agricultural activities, the majority of agricultural facilities are defined as non-point sources and are exempt from NPDES regulation. Pollutant contributors come from direct and indirect sources. Direct sources discharge directly to receiving waters, whereas indirect sources discharge wastewater to POTWs, which in turn discharge to receiving waters. Under the national program, NPDES permits are issued only to direct point source discharges. The National Pretreatment Program addresses industrial and commercial indirect dischargers. Municipal sources are POTWs that receive primarily domestic sewage from residential and commercial customers. Specific NPDES program areas applicable to municipal sources are the National Pretreatment Program, the Municipal Sewage Sludge Program, Combined Sewer Overflows (CSOs), and the Municipal Storm Water Program. Non-municipal sources include industrial and commercial facilities. Specific NPDES program areas applicable to these industrial/commercial sources are: Process Wastewater Discharges, Non-Process Wastewater Discharges, and the Industrial Storm Water Program. NPDES issues two basic permit types: individual and

5. Environmental Analysis HYDROLOGY AND WATER QUALITY

general. Also, for the past ten years, or so, the EPA has increasingly focused on integrating the NPDES program further into watershed planning and permitting.²

The NPDES has a variety of measures designed to minimize and reduce pollutant discharges. All counties with storm drain systems that serve a population of 50,000 or more, as well construction sites one acre or more in size, must file for and obtain an NPDES permit. Another measure for minimizing and reducing pollutant discharges to a publicly owned conveyance or system of conveyances (including roadways, catch basins, curbs, gutters, ditches, man-made channels and storm drains, designed or used for collecting and conveying stormwater) is the EPA's Storm Water Phase II Final Rule.

The NPDES Program is a federal program which has been delegated to the State of California for implementation through the State Water Resources Control Board and the nine Regional Water Quality Control Boards. In California, NPDES permits are also referred to as waste discharge requirements (WDRs) that regulate discharges to waters of the United States (see State Regulatory Agency under State Regulations below for more detail).

State

California Government Code, Section 53097

California Government Code Section 53097 requires school districts to comply with any city or county ordinance regulating drainage improvements. Section 53097 also requires school districts to comply with ordinances requiring review and approval of grading plans as they relate to design and construction of onsite improvements that affect drainage.

California Water Code, Sections 13000 et seq.

The **Porter-Cologne Water Quality Act** is the basic water quality control law for California. Under this act, the State Water Resources Control Board (SWRCB) has ultimate control over state water rights and water quality policy. In California, the EPA has delegated authority to issue NPDES permits to the SWRCB. The state is divided into nine regions related to water quality and quantity characteristics. The SWRCB, through its nine RWQCBs, carries out the regulation, protection, and administration of water quality in each region. Each regional board is required to adopt a Water Quality Control Plan or Basin Plan that recognizes and reflects the regional differences in existing water quality, the beneficial uses of the region's ground and surface water, and local water quality conditions and problems. The District is in the Los Angeles River Basin, Region 4, in the Los Angeles, Santa Monica Bay, and Dominguez watersheds. The Water Quality Control Plan for the Los Angeles River Basin (4) was adopted in 1994. This Basin Plan gives direction on the beneficial uses of the state waters within Region 4, describes the water quality that must be maintained to support such uses, and provides programs, projects, and other actions necessary to achieve the standards established in the Basin Plan.

² Source: EPA, <http://www.epa.gov/npdes/pubs/101pape.pdf>, September 2004.

5. Environmental Analysis

HYDROLOGY AND WATER QUALITY

California Water Code, Section 13260

California Waste Discharge Requirements require that any person discharging waste or proposing to discharge waste within any region that could affect the quality of the waters of the State, other than into a community sewer system, must submit a report of waste discharge to the RWQCB.

California Fish and Game Code, Sections 1602 et seq.

Prior to undertaking any construction activity within streambeds, including all intermittent as well as perennial streams, a **Streambed Alteration Agreement** must be obtained from the California Department of Fish and Wildlife (CDFW). Through this agreement, CDFW attempts to ensure that any approved construction activity protects stream resources through design, construction planning, and specific mitigation measures.

California Education Code, Sections 17212, 17215.5; CCR, Title 5, Section 14010(g)

School Siting Restriction in Floodplains prohibits a school district from selecting a site for a new school that is within an area of flood or dam flood inundation, unless the cost of mitigating the flood or inundation impact is reasonable. Potential damage can be mitigated by elevating the site above flood levels, creating improved levees or drainage infrastructure, and/or emergency notification and evacuation procedures. CDE may require a hydrologic study or other means of confirming that a site will not be subject to flooding and/or a report of proposed mitigation measures.

Regulatory Agencies

State

State Water Resources Control Board

Statewide General NPDES Permit for Storm Water Discharges from Industrial Sites. On April 17, 1997, the State Water Board adopted the existing Industrial General Permit, Water Quality Order 97-03-DWQ, for regulation of storm water discharges associated with industrial activity. The existing Industrial General Permit has expired but remains in effect until a new Industrial General Permit is adopted. State Water Board staff initiated an effort to reissue the Industrial General Permit in 2003. After several rounds of draft permit revisions and associated public comments, a Final Draft NPDES General Permit for Discharges Associated with Industrial Activities was released February 19, 2014.³ It is anticipated by the SWRCB that this Industrial General Permit will be adopted and become effective July 1, 2015.

The NPDES Industrial General Permit must require implementation of best available technology economically achievable and best conventional pollutant control technology to reduce or prevent pollutants in storm water discharges and authorized non-storm water discharges (NSWDs). The Industrial General Permit regulates industrial storm water discharges and authorized NSWDs from specific categories of industrial facilities (e.g., transportation facilities, sewage treatment plants) and industrial storm water discharges and authorized NSWDs from facilities designated by the Regional Water Boards to obtain coverage under this

³ http://www.waterboards.ca.gov/water_issues/programs/stormwater/docs/industrial_permitdocs/strikeout/igp_docs_2192014.pdf.

5. Environmental Analysis HYDROLOGY AND WATER QUALITY

General Permit. The Industrial General Permit does not apply to industrial storm water discharges and NSWDS that are regulated by other individual or general NPDES permits. The Industrial General Permit does not preempt or supersede the authority of municipal agencies to prohibit, restrict, or control industrial storm water discharges and authorized NSWDS that may discharge to storm water conveyance systems or other watercourses within their jurisdictions as allowed by state and federal law.

Statewide NPDES General Permit for Storm Water Discharges from Construction Sites. In 2012, pursuant to the CWA, the SWRCB issued an amended statewide NPDES General Permit for storm water discharges from construction sites as shown in the table.⁴

Order Number	Effective	Expires
Order No. 2009-0009-DWQ was adopted by the State Water Resources Control Board on September 2, 2009	July 1, 2010	
Order No. 2009-0009-DWQ as amended by 2010-0014-DWQ	February 14, 2011	September 2, 2014
Order No. 2009-0009-DWQ as amended by 2010-0014-DWQ as further amended by 2012-0006-DWQ, was adopted by the State Water Resources Control Board on July 17, 2012	July 17, 2012	September 2, 2014

Under the Construction General Permit, discharges of storm water from construction sites with a disturbed area of one or more acres are required to either obtain individual NPDES permits for storm water discharges or be covered by the Construction General Permit. Coverage by the Construction General Permit is accomplished by completing and filing a Notice of Intent with the SWRCB and developing and implementing a Storm Water Pollution Prevention Plan (SWPPP). Required elements of a SWPPP include: (1) site description addressing the elements and characteristics specific to the site, (2) descriptions of BMPs for erosion and sediment controls, (3) BMPs for construction waste handling and disposal, (4) implementation of approved local plans, (5) proposed post-construction controls, including description of local post-construction erosion and sediment control requirements, and (6) non-storm-water management. Each applicant under the Construction General Permit must ensure that a SWPPP is prepared prior to grading and is implemented during construction. The SWPPP must list BMPs that will be used on the construction site to protect storm water runoff and must contain a visual monitoring program; a chemical monitoring program for "non-visible" pollutants to be implemented if there is a failure of BMPs; and a monitoring plan if the site discharges directly to a water body listed on the state's 303(d) list of impaired waters.

The Statewide Municipal Storm Water Permitting Program

The Municipal Storm Water Permitting Program regulates storm water discharges from municipal separate storm sewer systems (MS4s). MS4 permits were issued in two phases.

⁴ State Water Resources Control Board. National Pollutant Discharge Elimination System (NPDES) General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities. ORDER NO. 2012-0006-DWQ; NPDES NO. CAS000002. http://www.waterboards.ca.gov/board_decisions/adopted_orders/water_quality/2012/wqo2012_0006_dwq.pdf

5. Environmental Analysis

HYDROLOGY AND WATER QUALITY

Phase I MS4 NPDES Permit

Under Phase I,⁵ which started in 1990, the RWQCBs have adopted General (NPDES) storm water permits for medium (serving between 100,000 and 250,000 people) and large (serving 250,000 people) municipalities. Most of these permits are issued to a group of co-permittees encompassing an entire metropolitan area. These permits are reissued as the permits expire. The Phase I MS4 permits require the discharger to develop and implement a SWPPP with the goal of reducing the discharge of pollutants to the maximum extent practicable (MEP). MEP is the performance standard specified in Section 402(p) of the Clean Water Act. The management programs specify which BMPs will be used to address certain program areas. The program areas include public education and outreach; illicit discharge detection and elimination; construction and post-construction; and good housekeeping for municipal operations. In general, medium and large municipalities are required to conduct monitoring.

The Phase I MS4 permitted entities within the coastal watersheds of Los Angeles County—the Los Angeles County Flood Control District (LACFCD), the County of Los Angeles, and 84 incorporated cities within the coastal watersheds of Los Angeles County, with the exception of the City of Long Beach MS4s—are covered under Order No. R4-2012-0175 NPDES Permit No. CAS004001.⁶ This order expires on December 28, 2017.

The waters and pollutants discharged from the LACFCD's system come from various sources. These sources can include storm water and non-storm water from the permittees under this permit and other NPDES and non-NPDES permittees discharging into the LACFCD's system, including industrial waste water dischargers, wastewater treatment facilities, industrial and construction stormwater permittees, water suppliers, government entities, CERCLA potentially responsible parties, and Caltrans. Sources can also include discharges from school districts that do not operate large- or medium-sized municipal storm sewers and discharges from entities that have waste discharge requirements or waivers of waste discharge requirements.

Phase II MS4 NPDES Permit

On April 30, 2003 as part of Phase II,⁷ the SWRCB issued a General Permit for the Discharge of Storm Water from Small MS4s (WQ Order No. 2003-0005-DWQ) to provide permit coverage for smaller municipalities (population less than 100,000), including non-traditional Small MS4s, which are facilities such as military bases, public campuses, and prison and hospital complexes. The Phase II Small MS4 General Permit covers Phase II permittees statewide. On February 5, 2013, a new Phase II Small MS4 General Permit⁸ (Order No. 2013 - 0001- DWQ; NPDES No. CAS 000004) was adopted and became effective on July 1, 2013. This order expires June 30, 2018. Phase II MS4 permittees must require long-term, post-construction BMPs to be incorporated into new development and significant redevelopment projects. LAUSD is not designated as a non-traditional permittee of the Phase II MS4 Permit. However, LAUSD satisfies its obligation to protect and restore California's water resources through numerous other programs,

⁵ Phase I MS4 Area Wide Permits Program http://www.waterboards.ca.gov/water_issues/programs/stormwater/phase_i_municipal.shtml.

⁶ http://www.waterboards.ca.gov/losangeles/water_issues/programs/stormwater/municipal/la_ms4/2012/Order%20R4-2012-0175%20-%20A%20Final%20Order%20revised.pdf.

⁷ Phase II MS4 State Wide Permits Program http://www.waterboards.ca.gov/water_issues/programs/stormwater/phase_ii_municipal.shtml.

⁸ http://www.waterboards.ca.gov/water_issues/programs/stormwater/docs/phsii2012_5th/wqo2013_0001_dwq.pdf.

5. Environmental Analysis HYDROLOGY AND WATER QUALITY

policies, and actions that are equivalent to coverage under the Phase II MS4 Permit. For instance, LAUSD complies with the: 1) Construction General Permit; 2) Post-Construction Storm Water Management for New Development and Redevelopment; and 3) Industrial General Permit. LAUSD's programs and policies demonstrate its commitment to protection and restoration of beneficial uses of receiving waters and are described further below.

Local

City or County Storm Drain System – Permits and Approvals

Where LAUSD projects connect to City or County storm drain systems, the connection is subject to the requirements of the City or County. Storm drain connections made from the property line to a catch basin or a storm drain pipe in the public right-of-way require a permit or approval from the municipality that owns or operates the storm drain. The City of Los Angeles Department of Public Works requires a Sewer Permit (S-Permit) for a new connection of a property's storm sewer line to the City's storm sewer system or the repair of an existing connection. The Bureau of Engineering issues the S-Permit.⁹ The design standards are provided in the Bureau of Engineering Storm Drain Design Manual.¹⁰ Hydrologic design performed by the project's drainage engineer is checked by the City using the Los Angeles County Hydrology Manual and the Los Angeles County Sedimentation Manual.¹¹ All storm drain design calculations should take into account future possible development upstream when sizing pipes. This may not be possible if there are preexisting downstream limitations.

An LACFCD permit is required: (1) for any work in an LACFCD easement, (2) for storm drain connections or remodeling of existing LACFCD drainage facilities, and (3) for work in streets which will physically affect existing LACFCD drainage structures. Other cities in the District boundary have similar requirements.

LAUSD

Standard Conditions of Approval

LAUSD Standards

This table lists the ~~air quality, hydrology and water quality related standard conditions and project design features (PDF)~~ that ~~are~~ will be included as part of each SUP-related project, as appropriate.

⁹ City of Los Angeles Department of Public Works. Bureau of Engineering. Bureau of Engineering issues the S-Permit. <http://eng.lacity.org/techdocs/permits/index.htm>.

¹⁰ City of Los Angeles Department of Public Works. Bureau of Engineering Storm Drain Design Manual. <http://eng.lacity.org/techdocs/stormdr/Index.htm>.

¹¹ Los Angeles County Hydrology Manual and the Los Angeles County Sedimentation Manual. http://dpw.lacounty.gov/DES/design_manuals/.

5. Environmental Analysis HYDROLOGY AND WATER QUALITY

PDF Reference #	Topic	Trigger for Compliance	Implementation Phase	Standard Conditions and Project Design Feature
Standard Conditions				
SC-HWQ-00 Compliance 1	Storm Water Requirements	Projects with Land disturbance-	During construction	Stormwater Technical Manual This manual establishes design requirements and provides guidance for the cost-effective improvement of water quality in new and significantly redeveloped LAUSD school sites. These guidelines are intended to improve water quality and mitigate potential impacts to the Maximum Extent Practicable (MEP). While these guidelines meet current post-construction Standard Urban Stormwater Mitigation Plan (SUSMP) requirements. The guidelines address the mandated post-construction element of the NPDES program requirements.
SC-HWQ-00 Compliance 2	Storm Water Requirements	Projects with Land disturbance-	During construction	Compliance Checklist for Storm Water Requirements at Construction Sites. This checklist has requirements for compliance with the General Construction Activity Permit and is used by OEHS to evaluate permit compliance. Requirements listed include a SWPPP; BMPs for minimizing storm water pollution to be specified in a SWPPP; and monitoring storm water discharges to ensure that sedimentation of downstream waters remains within regulatory limits
SC-HWQ-00 Compliance 3	Miscellaneous Requirements	Ongoing maintenance and repair	During construction and operation	<ul style="list-style-type: none"> -• <u> </u> Environmental Training Curriculum -• <u> </u> Hazardous Waste Management Program -• <u> </u> Medical Waste Management Program -• <u> </u> Environmental Compliance Inspections -• <u> </u> Safe School Inspections -• <u> </u> Integrated Pest Management Program -• <u> </u> Fats Oil and Grease Management Program -• <u> </u> Solid Waste Management Program
SC-HWQ-44	Flood hazards Hazar ds	If project requires S-site acquisition	During project design	The analysis for new projects shall include evaluation of all possible flood hazards as determined by: (1) review of FEMA flood maps; (2) review of flood information provided by local city or county floodplain managers; (3) review of California Department of Water Resources dam safety information; and, (4) local drainage analysis by a civil engineer. The flood hazard determination shall include consideration of tsunamis and debris flow. New projects should be located outside of these hazard areas, if practical.
SC-HWQ-25	Flood hazards Hazar ds	If project requires S-site acquisition	During project design	Where placing the project outside the floodplain is impractical, the school or project structure shall be protected from flooding by containment and control of flood flows (e.g., elevating lowest floors at least one foot above the expected 100-year flood level).
SC-HWQ-36	Tsunami Hazards	Place new classrooms or outdoor play areas if occupied spaces are within 0.62 mile of the coast, and less than	Prior to classroom occupation	LAUSD shall evaluate tsunami hazards to determine if the project site is within a tsunami inundation zone as delineated by CalEMA or NOAA. If the project site is within a tsunami hazard zone LAUSD shall prepare and implement a tsunami awareness program and

5. Environmental Analysis HYDROLOGY AND WATER QUALITY

PDF Reference #	Topic	Trigger for Compliance	Implementation Phase	Standard Conditions and Project Design Feature
		100 feet above mean sea level.		evacuation plan. This plan shall comply with the provisions of the LAUSD Emergency Operations Plan.

5. Environmental Analysis HYDROLOGY AND WATER QUALITY

PDF Reference #	Topic	Trigger for Compliance	Implementation Phase	Standard Conditions and Project Design Feature
SC-HWO-47	Debris Flow areas	Place new classrooms or outdoor play areas if classrooms are located in areas subject to potentially damaging debris flow.	During project design	LAUSD shall consult with the Los Angeles County Department of Public Works, and/or local city officials, as appropriate, regarding the debris flow potential near the mouth of or in natural canyons and feasible mitigation measures shall be developed to reduce any potential risk. Potential debris flow hazards shall be reduced by one or more of the following: adequate building setbacks from natural slopes, construction of debris control facilities in upstream areas, monitoring and maintaining potential debris flow areas and basins. In addition, potential loss shall be minimized by establishing an evacuation plan, and elevated awareness and early warning of pending events.

LAUSD Stormwater Technical Manual

The LAUSD Stormwater Technical Manual¹² establishes design requirements and provides guidance for the cost-effective improvement of water quality in new and significantly redeveloped LAUSD school sites. These guidelines are intended to improve water quality and mitigate potential impacts to the Maximum Extent Practicable (MEP). While these guidelines were developed in 2009 in anticipation of a forthcoming NPDES Phase II MS4 Permit, they are intended to meet current post-construction Standard Urban Stormwater Mitigation Plan (SUSMP) requirements¹³ in a manner appropriate for LAUSD. Specifically, the guidelines in the manual address the mandated post-construction element of the NPDES program requirements enforced by the Los Angeles RWQCB in the Los Angeles region.

There are two primary purposes of the LAUSD Stormwater Technical Manual:

1. To guide design architects and LAUSD's supervising design management staff during the planning and design stages of new and significant redevelopment school project planning to ensure that appropriate stormwater reduction and treatment elements are included in the final construction documents. Guidance is provided on low impact development (LID) techniques and design criteria and guidance are provided for structural treatment BMP selection and design.
2. To provide guidance to LAUSD Maintenance and Operations staff on implementation of source control BMPs and maintenance of structural treatment BMPs. Storm water management guidelines were previously established in the Post-Construction Storm Water Management Plan Minimum Control Measures (BMP Selection White Paper).¹⁴ This Storm

¹² LAUSD Stormwater Technical Manual. Prepared for Los Angeles Unified School District by Geosyntec Consultants. October 2009. http://www.laschools.org/employee/design/fs-studies-and-reports/download/white_paper_report_material/Storm_Water_Technical_Manual_2009-opt-red.pdf?version_id=76975850.

¹³ County of Los Angeles, Department of Public Works. 2008. SUSMP Review Sheet. <http://dpw.lacounty.gov/BSD/lib/fp/Drainage%20and%20Grading/Plan%20Check%20Documents/SUSMP%20Review%20Sheet%2006-13-2011.pdf>.

¹⁴ Geosyntec Consultants. 2007. Post-Construction Storm Water Management Plan (Minimum Control Measures BMP Selection White Paper). Prepared for Los Angeles Unified School District. October 2007. http://www.laschools.org/employee/design/fs-studies-and-reports/download/white_paper_report_material/BMP_White_Paper_Oct__2007.pdf?version_id=9490499.

5. Environmental Analysis HYDROLOGY AND WATER QUALITY

Water Technical Manual supersedes the BMP Selection White Paper. This manual provides the best currently available guidance on post-construction storm water management practices required for new and significantly redeveloped school sites, per School Design Guide Section 3.2.E., Storm and Sanitary Drainage.

LAUSD Compliance Checklist and Contracting Protocol for Storm Water Requirements at Construction Sites

A Compliance Checklist for Storm Water Requirements at Construction Sites (“Compliance Checklist”), issued by the LAUSD Office of Environmental Health and Safety (OEHS) in 2010, lists requirements for compliance with the General Construction Activity Permit and is used by OEHS to evaluate permit compliance. Requirements listed in the Compliance Checklist include a SWPPP; BMPs for minimizing storm water pollution to be specified in a SWPPP; and monitoring storm water discharges to ensure that sedimentation of downstream waters remains within regulatory limits.

For construction sites one acre or more, LAUSD contractors must prepare a Permit Registration Document (PRD) demonstrating compliance and coverage under the RWQCB General Permit for Storm Water discharges Associated with Construction and Land Disturbance Activities (Order No. 2012-0006-DWQ; NPDES No. CAS000002). Also required is preparation, implementation, upkeep, and monitoring of a SWPPP and associated BMPs for purposes of preventing pollution of receiving waters and demonstrating compliance with the Construction General Permit.

For projects with land disturbance *less than* one acre, a PRD is not required. However, LAUSD requires any BMP indicated in the California Stormwater Quality Association (CASQA) BMP Handbook¹⁵ preventing or minimizing storm water pollution to be implemented by construction contractor (at no cost to LAUSD). In addition, the contractor shall prepare and submit a SWPPP for review and approval by the LAUSD.

Other LAUSD Standards

LAUSD has developed and implemented many programs at its sites to protect the environment, and has done so without a permit mandate. These programs include, but are not limited to, Environmental Training Curriculum, Hazardous Waste Management Program, Medical Waste Management Program, Environmental Compliance Inspections, Safe School Inspections, Integrated Pest Management Program, Fats Oil and Grease Management Program, and Solid Waste Management Program. Moreover, as described above, the LAUSD developed a post-construction storm water white paper in 2007 and followed it, at the Los Angeles RWQCB’s request, in 2009 with a technical manual for storm water management. The technical manual and white paper set District policy for LID, design, and maintenance of post construction BMPs. The white paper and manual were developed and implemented on a cooperative basis with the Los Angeles RWQCB outside the confines of a permit mandate. These policies help develop school specific guidelines for storm water management and assist in keeping costs manageable for relatively clean instructional sites.

¹⁵ California Stormwater Quality Association (CASQA). 2014. Construction BMP Online Handbook. <https://www.casqa.org/resources/bmp-handbooks>.

5. Environmental Analysis

HYDROLOGY AND WATER QUALITY

5.9.1.2 EXISTING CONDITIONS

Regional Setting

The LAUSD spans three watersheds: from north to south—the Los Angeles, Santa Monica Bay, and Dominguez watersheds (see Figure 5.9-1, *Watersheds*).

Watershed

The **Los Angeles Watershed** spans 830 square miles of western, central, and southern Los Angeles County and some small areas of eastern Ventura County. The watershed extends from the San Gabriel Mountains on the northeast, to the Santa Susana Mountains and Santa Monica Mountains on the northwest and west, respectively, and extends south to the mouth of the Los Angeles River in the City of Long Beach. The watershed includes all of the San Fernando Valley, much of central Los Angeles, and parts of south Los Angeles. The Los Angeles River, the primary stream in the watershed, extends 48 miles from the confluence of Bell Creek and the Arroyo Calabasas in the southwest San Fernando Valley to the Pacific Ocean at the City of Long Beach.

The **Santa Monica Bay Watershed** spans 673 square miles, ranging from the west end of the Santa Monica Mountains in Ventura County to parts of the western Los Angeles Basin and south to the coastal side of the Palos Verdes Peninsula. The southeast corner of the watershed is in the Community of San Pedro in the City of Los Angeles. Many streams in the Santa Monica Mountains, Palos Verdes Hills, and Los Angeles Basin provide drainage in the watershed, which is not dominated by one stream as with the Los Angeles Watershed. Ballona Creek is the major drainage route for much of the part of the watershed in the Los Angeles Basin.

The **Dominguez Watershed** spans 133 square miles of southwest Los Angeles County, extending from just north and east of Los Angeles International Airport at its north end to Los Angeles Harbor in the Community of Wilmington in the City of Los Angeles at its south end, where the Dominguez Channel ends. Most of the watershed is in the Los Angeles Basin, but the watershed also encompasses north-facing slopes of the Palos Verdes Hills. The Dominguez Channel, the primary drainage channel in the watershed, extends 15 miles from the City of Hawthorne to the Los Angeles Harbor.

Surface Water Quality

Surface water quality has been degraded within the watersheds encompassing the District, mostly through nonpoint source pollutants. Pollutants from industrial and municipal effluents are also a problem. All large watersheds within the LAUSD are affected.

Section 303(d)(1) of the federal Clean Water Act requires states to identify waters that do not meet applicable water quality standards with technology-based controls alone and prioritize such waters for the purposes of developing Total Maximum Daily Loads. Section 13191.3(a) of the California Water Code (CWC) requires the SWRCB and the RWQCBs to assess water quality data for California's waters periodically (nominally every two years) to determine if they contain pollutants at levels that exceed protective water quality criteria and standards. Contemporary water quality assessments for select surface water bodies in the District are briefly summarized below.

5. Environmental Analysis HYDROLOGY AND WATER QUALITY

Los Angeles River: Portions of the Los Angeles River are listed under Section 303(d) for contamination with coliform bacteria, selenium, ammonia, copper, lead, nutrients, taste and odor, and trash.¹⁶

Ballona Creek: Ballona Creek is listed under Section 303(d) for contamination with cadmium, coliform bacteria, copper, cyanide, lead, selenium, toxicity, trash, viruses, and zinc.¹⁷

Dominguez Channel: Portions of the Dominguez Channel are listed under Section 303(d) for contamination with ammonia, copper, diazinon,¹⁸ indicator bacteria, lead, toxicity, zinc, benthic community effects,¹⁹ benzo(a)pyrene, benzo(a)anthracene,²⁰ chlordane,²¹ chrysene,²² coliform bacteria, DDT, dieldrin,²³ lead, polychlorinated biphenyls (PCBs),²⁴ phenanthrene, pyrene,²⁵ sediment toxicity, and zinc.²⁶

Groundwater

The part of the District in the San Fernando Valley is underlain by the San Fernando Valley Groundwater Basin. The part of the District in the Los Angeles Basin is underlain by four sub-basins of the Coastal Plain of the Los Angeles Groundwater Basin: from north to south, the Hollywood, Santa Monica, Central, and West Coast Sub-basins (see Figure 5.9-2, *Groundwater Basins*).²⁷

San Fernando Valley

Half of the Los Angeles Department of Water and Power's 115 groundwater wells in the San Fernando Valley are inactive due to groundwater contamination. Major contaminants include volatile organic compounds (VOCs; especially TCE [trichloroethylene], PCE [perchloroethylene], and carbon tetrachloride); nitrates, and perchlorate.²⁸

Groundwater treatment systems in the San Fernando Valley include the Tujunga Wellfield Joint Project, which uses liquid-phase granular activated carbon; the North Hollywood Operable Unit, which uses air to remove VOCs; and the Pollock Wells Treatment Plant, with four liquid-phase granular activated carbon units.²⁹

¹⁶ State Water Resources Control Board (SRWCB). 2014, January 31. 2010 Integrated Report (Clean Water Act Section 303(d) List/305(b) Report) — Statewide. http://www.waterboards.ca.gov/water_issues/programs/tmdl/integrated2010.shtml.

¹⁷ State Water Resources Control Board (SRWCB). 2014, January 31. 2010 Integrated Report (Clean Water Act Section 303(d) List/305(b) Report) — Statewide. http://www.waterboards.ca.gov/water_issues/programs/tmdl/integrated2010.shtml.

¹⁸ Diazinon is an organophosphate insecticide.

¹⁹ Benthic communities are those on the floors of bodies of water such as the ocean or a lake.

²⁰ Benzo(a)pyrene and benzo(a)anthracene are hydrocarbons.

²¹ Chlordane is an organochlorine insecticide.

²² Chrysene is a hydrocarbon.

²³ DDT (dichlorodiphenyltrichloroethane) and dieldrin are organochlorine insecticides.

²⁴ Polychlorinated biphenyls (PCBs) are chlorinated hydrocarbons that were formerly used as coolants in electrical equipment.

²⁵ Phenanthrene and pyrene are hydrocarbons.

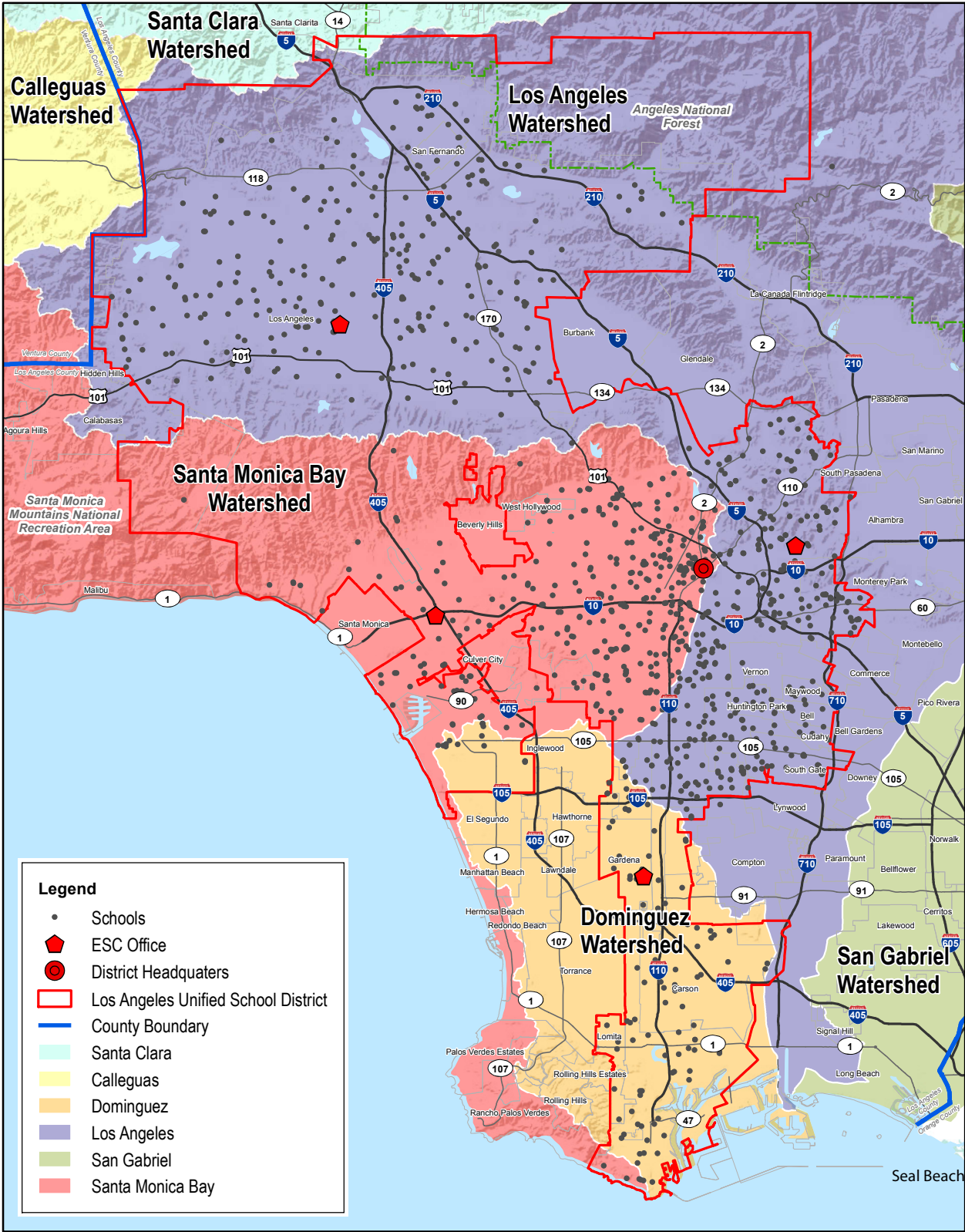
²⁶ State Water Resources Control Board (SRWCB). 2014, January 31. 2010 Integrated Report (Clean Water Act Section 303(d) List/305(b) Report) — Statewide. http://www.waterboards.ca.gov/water_issues/programs/tmdl/integrated2010.shtml.

²⁷ California Department of Water Resources (DWR). 2013. GIS data layer.

²⁸ Los Angeles Department of Water and Power (LADWP). 2011, May. 2010 Urban Water Management Plan. http://www.water.ca.gov/urbanwatermanagement/2010uwmps/Los%20Angeles%20Department%20of%20Water%20and%20Power/LADWP%20UWMP_2010_LowRes.pdf.

²⁹ Los Angeles Department of Water and Power (LADWP). 2011, May. 2010 Urban Water Management Plan. http://www.water.ca.gov/urbanwatermanagement/2010uwmps/Los%20Angeles%20Department%20of%20Water%20and%20Power/LADWP%20UWMP_2010_LowRes.pdf.

5. Environmental Analysis Figure 5.9-1 - Watersheds

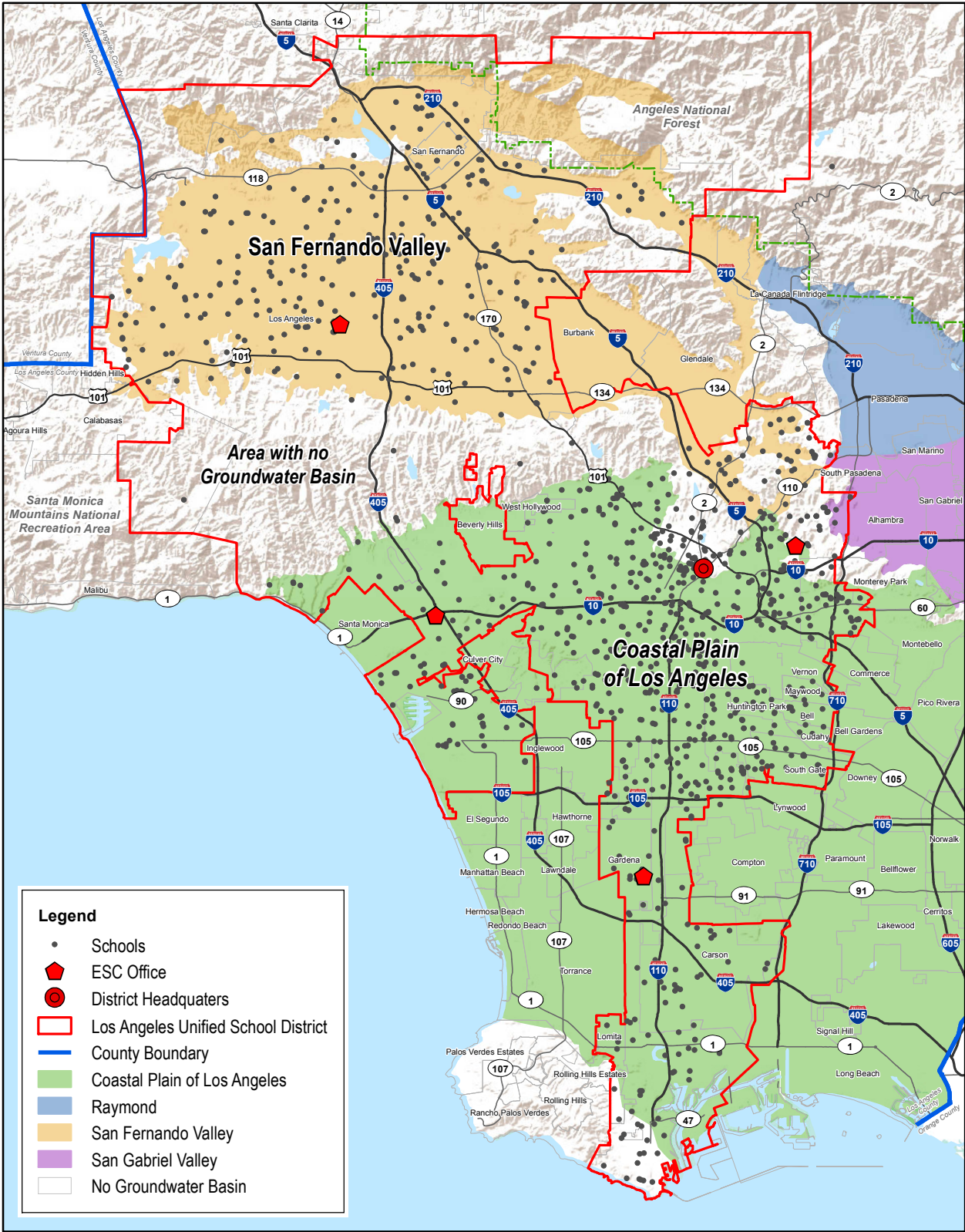


Source: United States Geological Survey, 2013

5. Environmental Analysis HYDROLOGY AND WATER QUALITY

This page intentionally left blank.

5. Environmental Analysis Figure 5.9-2 - Groundwater Basins



Source: California Department of Water Resources, 2013

5. Environmental Analysis HYDROLOGY AND WATER QUALITY

This page intentionally left blank.

5. Environmental Analysis

HYDROLOGY AND WATER QUALITY

Los Angeles Basin

Overall, the groundwater in the Central sub-basin and West Coast sub-basin continues to be of high quality, suitable for potable and non-potable uses.³⁰ Wellhead treatment is used in certain places in the Central sub-basin to remove TCE, PCE, iron, manganese, arsenic, and carbon tetrachloride from groundwater.³¹

A groundwater treatment facility, the Water Quality Protection Project, treats groundwater for VOC contamination in the City of Pico Rivera in the Central Sub-basin; the contamination is a plume originating from the San Gabriel Valley to the north. The facility uses granular activated carbon and has a capacity of 2,000 gallons per minute.³²

Flood Hazards

Designated Flood Zones

One-hundred-year flood zones in the District are generally along waterways—such as the Los Angeles River, Tujunga Wash, and Ballona Creek—and in some low-lying areas of the Los Angeles Basin, such as parts of southwest Los Angeles and parts of the City of Carson and Community of Wilmington (see Figure 5.9-3, *Flood Zones*).

Seismically Induced Dam Inundation

Parts of the LAUSD are in dam inundation zones; the dams are listed by their watersheds.

Los Angeles Watershed: San Fernando Valley and Surroundings

Parts of the eastern San Fernando Valley are in dam inundation areas of the following dams:

- Hansen Dam on the Tujunga Wash, near the Community of Lake View Terrace in the City of Los Angeles.
- Los Angeles Reservoir near the Community of Sylmar in the City of Los Angeles
- Encino Reservoir in the Santa Monica Mountains south of the Community of Encino in the City of Los Angeles
- Sepulveda Dam on the Los Angeles River near the Community of Van Nuys in the City of Los Angeles
- Pacoima Reservoir on Pacoima Wash north of the City of San Fernando

³⁰ Water Replenishment District of Southern California (WRD). 2013, March. Regional Groundwater Monitoring Report Water Year 2011-2012. www.wrd.org/engineering/reports/2011_12_RGWMR_Final_Web.pdf.

³¹ Water Replenishment District of Southern California (WRD). 2013, October 15. Safe Drinking Water Program. http://www.wrd.org/safe_drinking_water_2013_10_15.pdf.

³² Central Basin Municipal Water District (CBMWD). 2011, March. Draft 2010 Urban Water Management Plan. http://www.centralbasin.org/press_releases/Draft-2010-Urban-Water-Management-Plan.pdf.

5. Environmental Analysis HYDROLOGY AND WATER QUALITY

- Tujunga Reservoir on Tujunga Creek four miles north of the City of La Cañada-Flintridge³³

Los Angeles Watershed: Los Angeles Basin

- Devil's Gate Dam on the Arroyo Seco in the City of Pasadena. The part of the dam inundation area for Devil's Gate Dam in the District is a narrow area along the Arroyo Seco next to the communities of Highland Park and Mount Washington in the City of Los Angeles.
- Whittier Narrows Dam on the San Gabriel River and Rio Hondo³⁴ in the City of Montebello and in unincorporated Los Angeles County. The area in the District within the dam inundation area for Whittier Narrows Dam is approximately one square mile in the City of South Gate along the east District boundary.³⁵

Dominguez Watershed

- Palos Verdes Reservoir in the City of Rolling Hills Estates in the Palos Verdes Hills. The dam inundation area in the District is several hundred feet wide, extending from the west District boundary to the Los Angeles Harbor.³⁶

Seiches

A seiche is a surface wave created when an inland water body is shaken, usually by an earthquake. The greatest potential flood hazard from seiches in the District is overtopping or failure of a dam, addressed above under *Seismically Induced Dam Inundation*.

Tsunamis

The tsunami inundation area mapped by the California Geological Survey extends inland about 1.6 miles from the Pacific Ocean in the Community of Marina Del Rey in unincorporated Los Angeles County and to about 1.7 miles inland from the shore of the Los Angeles Harbor in the Community of Wilmington in the City of Los Angeles.³⁷ In most other coastal parts of the District, such as the Communities of Pacific Palisades and Playa Del Rey in the City of Los Angeles, the tsunami inundation area is limited to within several hundred feet of the coast.

³³ California Emergency Management Agency (Cal/EMA). 2007. Dam Inundation Maps DVD.

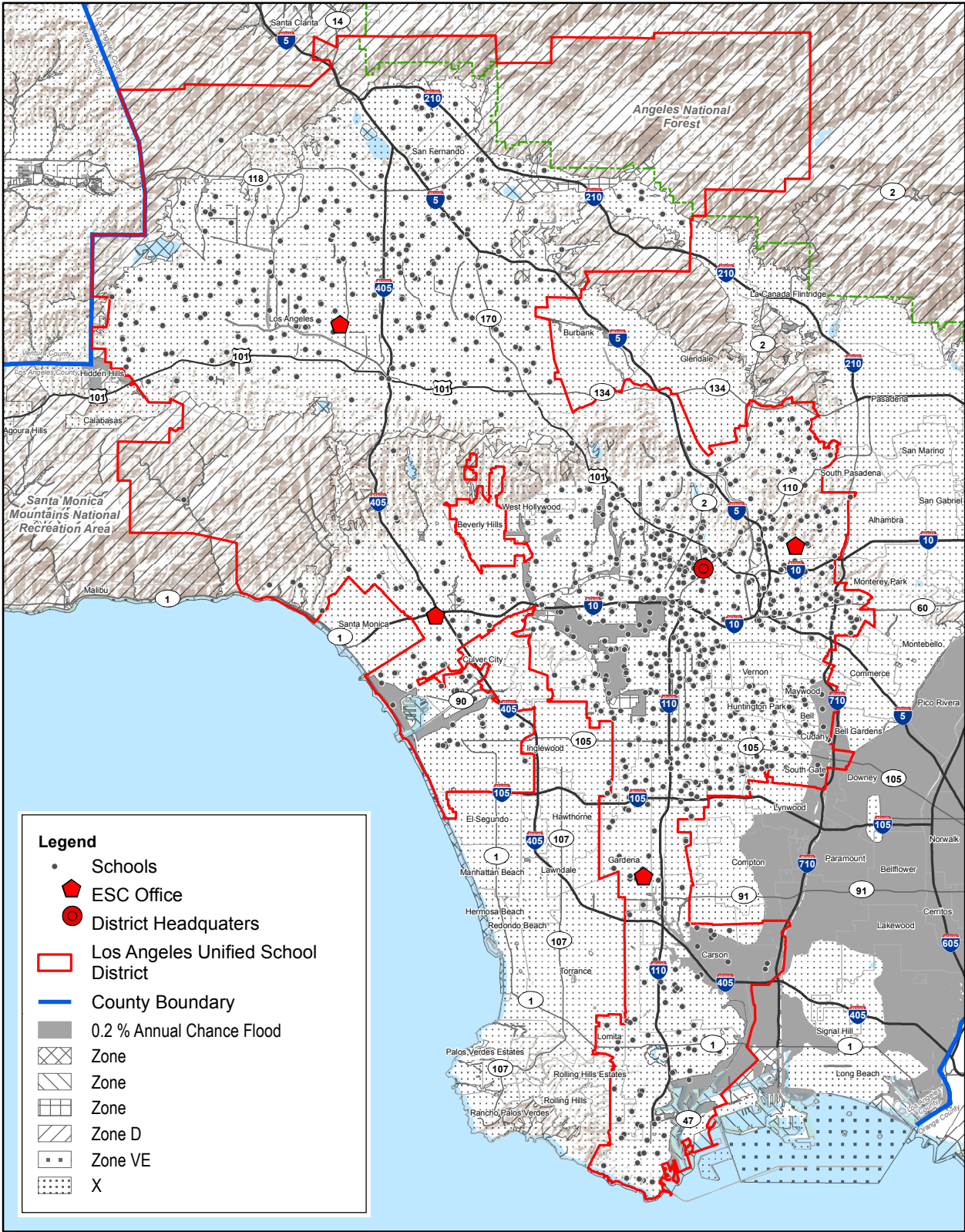
³⁴ The Rio Hondo is tributary to the Los Angeles River and connects the San Gabriel River at Santa Fe Dam in the San Gabriel Valley to the Los Angeles River in the City of South Gate.

³⁵ California Emergency Management Agency (Cal/EMA). 2007. Dam Inundation Maps DVD.

³⁶ California Emergency Management Agency (Cal/EMA). 2007. Dam Inundation Maps DVD.

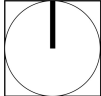
³⁷ California Geological Survey (CGS). 2013. Tsunami Emergency Response Planning Zone. GIS data layer.

5. Environmental Analysis
 Figure 5.9-3 - Flood Zones



Source: FEMA, 2013

0 6 Miles



5. Environmental Analysis HYDROLOGY AND WATER QUALITY

This page intentionally left blank.

5. Environmental Analysis

HYDROLOGY AND WATER QUALITY

Mudflows and Debris Flows

A mudflow is a landslide composed of saturated rock debris and soil with a consistency of wet cement. Areas that could be subject to mudflows are at the bases of foothills and mountains; canyons and areas immediately below the mouths of canyons; and washes. Such areas are found in and along the margins of the San Gabriel Mountains, Santa Susana Mountains, Simi Hills, and Santa Monica Mountains. Most of the urbanized parts of the District are on broad alluvial plains that are not subject to mudflows.

5.9.2 Thresholds of Significance

According to CEQA Guidelines Appendix G a project would normally have a significant effect on the environment if the project would:

- HWQ-1 Violate any water quality standards or waste discharge requirements.
- HWQ-2 Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted.
- HWQ-3 Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in a substantial erosion or siltation on- or off-site.
- HWQ-4 Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site.
- HWQ-5 Create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff.
- HWQ-6 Otherwise substantially degrade water quality.
- HWQ-7 Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map.
- HWQ-8 Place within a 100-year flood hazard area structures which would impede or redirect flood flows.
- HWQ-9 Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam.
- HWQ-10 Be subject to inundation by seiche, tsunami, or mudflow.

5. Environmental Analysis HYDROLOGY AND WATER QUALITY

5.9.3 Environmental Impacts

Impact 5.9-1: SUP-related projects would not violate any water quality standards or waste discharge requirements. [Threshold HWQ-1]

All SUP Projects

Storm water can run off surfaces such as rooftops, paved streets, highways, or parking lots and can carry pollutants such as: oil, pesticides, herbicides, sediment, construction waste, trash, bacteria, and metals. The runoff can then drain directly into a local stream, lake or bay. Often, the runoff drains into storm drains, which eventually drain untreated into a local water body.

Additionally, municipal or urban areas commonly include large impervious surfaces, which contribute to an increase in runoff flow, velocity, and volume. As a result, stream hydrology is impacted through streambed and channel scouring, in-stream sedimentation, and loss of aquatic and riparian habitat. In addition to hydrological impacts, large impervious surfaces contribute to greater pollutant loading, resulting in turbid water, nutrient enrichment, bacterial contamination, and increased temperature and trash.

Construction Impacts

The SUP would include projects that require grading and other construction activities that could cause deterioration of water quality if sediments or construction-related pollutants wash into the surface water system.

Compliance with regulatory requirements includes the following steps for all new construction projects that would disturb more than one acre.

- Prepare and implement a sediment and erosion control plan that follows the BMPs outlined by the State Water Resources Control Board to comply with the Construction General Permit;
- Develop and implement a SWPPP, with BMPs for new construction, as required by RWQCB NPDES regulations;
- Discharge water accumulated within the construction excavation pits in accordance with BMPs and a dewatering plan that must be developed and approved prior to construction as part of the NPDES Construction General Permit;
- Prevent construction-related sediment flows from entering storm drainage systems by constructing temporary filter inlets around existing storm drain inlets prior to the stabilization of construction site areas.

The aggregate runoff from construction sites that are less than one acre could create a condition of pollution, contamination, or nuisance as defined in California Water Code Section 13050. Considered in the aggregate, the total of these sites would be greater than one acre, all constructed without the benefit of

5. Environmental Analysis

HYDROLOGY AND WATER QUALITY

compliance with an SWPPP pursuant to the Construction General Permit. Therefore, water quality impacts from these sites in the aggregate could be significant if not otherwise mitigated or prevented.

The District has a program-wide SWPPP developed in 2005, updated 2007, and again in 2009. The LAUSD ensures that the aggregate storm water runoff from school construction projects built on sites of *less than one acre* does not create a condition of pollution, contamination, or nuisance as defined in California Water Code Section 13050. The program-wide SWPPP was developed by LAUSD, in consultation with the Los Angeles RWQCB, for all construction regardless of site size.

Under LAUSD's construction contracting protocols for new or existing project sites with land disturbance, including those disturbing *less than one acre*, any BMP indicated in the BMP Handbook required to prevent or minimize storm water pollution shall be implemented by the construction contractor. In addition, the contractor shall prepare and submit a SWPPP for review and approval by the LAUSD for sites less than one acre.

Thus, LAUSD's construction site storm water runoff control programs and ~~PDFs~~standard conditions, intended for the SUP in the aggregate, would mitigate the impact of all construction under the SUP, including sites less than one acre. These project sites also are subject to local ordinances and local erosion and sediment control requirements.

Operational Impacts

New projects operated under the SUP would not produce or discharge industrial wastes to surface or groundwater. Future projects may create additional sources of non-point source or "storm water" pollution from vehicular-related contaminants washing into the drainage system during wet weather. In some cases, projects would replace existing uses and/or pervious or impervious ground coverage. Most, if not all, of the new projects would be constructed in areas that are already developed and already producing non-point-source pollutants.

The LAUSD Stormwater Technical Manual establishes design requirements and provides guidance for the cost-effective improvement of water quality in new District school sites. These guidelines are intended to ensure that appropriate storm water reduction and treatment elements are included in new projects to the maximum extent practicable. They are also intended to meet current post-construction Standard Urban Storm water Mitigation Plan requirements in a manner appropriate for LAUSD. Specifically, the guidelines in the manual address the mandated post-construction element of the NPDES program requirements enforced by the Los Angeles RWQCB.

Compliance with applicable laws, regulations, and LAUSD Standards during project construction and operation would ensure that impacts associated with water quality standards or waste discharge requirements are less than significant.

5. Environmental Analysis HYDROLOGY AND WATER QUALITY

Impact 5.9-2: SUP-related projects would not substantially deplete groundwater supplies or interfere with groundwater recharge. [Threshold HWQ-2]

All SUP Projects

SUP-related projects would not result in any substantial changes in the quantity of groundwater supplies. No groundwater extraction activities would occur, and no wells would be constructed. There would be a decrease in percolation of water from the site into groundwater because of new impervious surfaces on some project sites; however, project design features would include mechanisms to control runoff from the newly impervious areas, and promote onsite percolation. The SUP would not significantly impact groundwater recharge capability.

The SUP is not growth inducing. Water use by the LAUSD, including groundwater, is based on the number of students in the District. Students will be in the LAUSD regardless of the existence of the SUP. Therefore, there is no growth-induced groundwater impact.

Compliance with applicable laws, regulations, and LAUSD Standards during project construction and operation would ensure that impacts associated with groundwater supplies are less than significant.

Impact 5.9-3: SUP-related projects would not substantially alter the existing drainage pattern of the site or area in a manner which would result in a substantial erosion or siltation on- or off-site. [Threshold HWQ-3]

All SUP Projects

Depending on the location of future projects, new projects on new property conceivably could substantially alter the existing drainage pattern of a site or area; however the District has standard conditions ~~and PDES~~ that apply to all projects that require collection of storm water runoff, compliance with applicable NPDES storm water permit requirements, restricting sediment flows into storm drainage systems, and compliance with the District's Stormwater Technical Manual. Additionally, compliance with applicable laws, regulations during project siting, construction and operation would ensure that impacts associated with alteration of the drainage pattern that would result in substantial erosion or siltation on- or off-site, are less than significant.

During construction, soil on some project sites would be disturbed which may lead to an increased potential for wind and water erosion. If not controlled, the transport of these materials to local waterways may temporarily increase suspended sediment concentrations and release pollutants attached to sediment particles into local waterways. The SWPPP and BMPs to be implemented during the project's construction activities would include, as applicable:

- Minimize disturbed areas of the site
- Preserve existing vegetation to the maximum extent practicable
- Re-vegetate exposed areas as quickly as possible
- Install onsite sediment basins to prevent off-site migration of erodible materials

5. Environmental Analysis

HYDROLOGY AND WATER QUALITY

- Install velocity dissipation devices at outlets of sediment basins
- Implement dust control measures, such as silt fences and regular watering of areas
- Stabilize construction entrances/exits
- Install storm drain inlet protection measures
- Install sediment control measures along the site, such as silt fences or gravel bag barriers

The operational phase of projects implemented under the SUP may incorporate a number of features outlined in the LAUSD Technical Manual to reduce the impact of erosion and siltation. The site design, source control, and treatment control BMPs for the operational phase would include, as applicable:

- Use native or drought-tolerant vegetation and shrubs on slope areas
- Drain rooftop runoff into landscaped areas and/or planters
- Use natural drainage swales and energy dissipaters at the outlets of storm drains or culverts
- Control erosion and runoff through the use of brow ditches on slopes.

Compliance with applicable laws, regulations, and LAUSD Standards during project construction and operation would ensure that impacts associated with drainage and erosion are less than significant.

Impact 5.9-4: SUP-related projects would not substantially alter the existing drainage pattern of the site or area, or increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site. [Threshold HWQ-4]

New Construction on New Property

Depending on the location of future projects, new projects on new property conceivably could alter the existing drainage pattern of a site or area, or increase the rate or amount of surface runoff. LAUSD has standard measures that require collection of storm water runoff, compliance with any applicable NPDES storm water permit, restricting sediment flows into storm drainage systems, and compliance with the District's Stormwater Technical Manual. Additionally, compliance with applicable laws, regulations, and standard LAUSD PDF-SC-HWQ-1 through PDF-SC-HWQ-4-3 during construction and operation would ensure that impacts associated with alteration of the drainage pattern that would increase the rate or amount of surface runoff which would result in flooding on- or off-site, are less than significant.

New Construction and Modernization on Existing Campus

Drainage patterns within this area are well established, with most drainage channels owned and operated by Los Angeles County and local cities, resulting in low potential for drainage alteration in most areas. However, New construction, modernization, repair, replacement, upgrade, remodel, renovation and installation projects on existing school campuses in outlying areas could potentially alter drainage patterns. The LAUSD PDFs SC-HWQ-1 requires collecting surface runoff in a storm water collection system designed for 25-year peak runoff rates. This PDF-condition would partially avoid drainage impacts, particularly for on-site flows, but may not adequately address off-site flows. The Education Code, however, requires that school sites not be

5. Environmental Analysis HYDROLOGY AND WATER QUALITY

within a flood zone unless the cost of mitigating the flood or inundation impact is reasonable (Sections 17212 and 17215.5). Mitigation in flood hazard areas could include importing fill to elevate the site above the floodplain or diversion of flows around the site, which could increase the flood hazard onto adjacent properties. This requirement would discourage locating schools in flood zones where drainage patterns could be disturbed. Compliance with applicable laws, regulations, and LAUSD Standards SC-HWQ-1 through SC-HWQ-5 during project construction and operation would ensure that impacts associated with drainage and flooding are less than significant.

Impact 5.9-5: SUP-related projects would not create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff. [Threshold HWQ-5]

New Construction on New Property

Depending on the location of future projects, new projects on new property conceivably could create or contribute runoff water that would exceed the capacity of existing or planned storm water drainage systems. Site-specific project design would include provisions to control surface runoff, and the requirements of applicable NPDES permits and Standard Urban Stormwater Mitigation Plans would be included. For example, the LAUSD requires the collection of storm water runoff, compliance with any applicable NPDES storm water permit, restricting sediment flows into storm drainage systems, and compliance with the District's Stormwater Technical Manual. Compliance with applicable laws, regulations, and LAUSD SC-HWQ-1, SC-HWQ-2 and SC-HWQ-3 Standards during project siting, construction and operation would ensure that impacts associated with runoff water that would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff, are less than significant.

New Construction and Modernization on Existing Campus

New construction, modernization, repair, replacement, upgrade, remodel, renovation and installation projects on existing school campuses would include storm water BMPs where required. These BMPs would be adequately designed to accommodate site runoff so that it would not adversely impact downstream storm drain facilities or provide substantial additional sources of polluted runoff. In addition, California Government Code Section 53097 requires school districts to comply with city and county ordinances regulating drainage improvements and requiring review and approval of grading plans as they relate to design and construction of on-site improvements that affect drainage. LAUSD would comply with Section 53097 in implementing the SUP. This compliance would ensure that school projects would not have a significant adverse effect on the local drainage system. The implementation of engineered drainage improvements would ensure that impacts to existing or planned drainage system would be less than significant.

5. Environmental Analysis

HYDROLOGY AND WATER QUALITY

Impact 5.9-6: SUP-related projects would not otherwise substantially degrade water quality. [Threshold HWQ-6]

All SUP Projects

As discussed under Impacts 5.9-1 through 5.9-5, the SUP may increase storm water runoff, which potentially could impact water quality. However, SUP-related projects would incorporate existing LAUSD ~~Standards~~ Standard Conditions and compliance with regulations during design, construction, and operation. Appropriate design measures would be recommended to ensure impacts are less than significant.

Impact 5.9-7: SUP-related projects would not place housing within a 100-year flood hazard area. [Threshold HWQ-7]

All SUP Projects

No residential development is planned as part of the SUP. Therefore, the SUP would not place housing within a 100-year flood hazard area.

Impact 5.9-8: SUP-related projects would not place structures within a 100-year flood hazard area that would impede or redirect flood flows. [Threshold HWQ-8]

All SUP Projects

New structures on new property, and new structures or replacement/installation/upgrade projects on existing campuses potentially may be placed within a 100-year flood plain. However, according to CDE requirements, a school must not be sited within a flood plain area unless the cost of mitigating the impact is reasonable.³⁸ In addition, a hydrologic study may be required in areas of flooding or potential flooding. Flooding can cause significant safety concerns for students and staff. In response to these concerns, measures can be taken to reduce impacts from flooding such as elevating the site above flood levels, creating or improving levees, and emergency notification and evacuation procedures.

Compliance with applicable laws, regulations, and implementation of LAUSD ~~Standards~~ Standard Conditions during project construction and operation would ensure that impacts associated with structures within a 100-year flood hazard area which would impede or redirect flood flows, are less than significant.

Impact 5.9-9: SUP-related projects could expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam. [Threshold HWQ-9]

All SUP Projects

New structures on new property and new structures or replacement/installation/upgrade projects on existing campuses potentially may be placed within a 100-year flood plain. However, CDE requirements specify a

³⁸ Education Code Sections 17212, 17215.5; CCR, Title 5, Section 14010(g)

5. Environmental Analysis

HYDROLOGY AND WATER QUALITY

distance of 1,500 feet from a reservoir or dam. Dams and reservoirs are monitored during storm events and measures are implemented to prevent water overflow. Also, as noted above (Impact 5.9-8), according to CDE requirements, a school cannot be within a flood plain area unless the cost of mitigating the impact is unreasonable.³⁹ In addition, a hydrologic study would be required in areas of flooding or potential flooding. Flooding can cause significant safety concerns for students and staff. In response to these concerns, measures would be taken to reduce impacts from flooding such as elevating the site above flood levels, creating or improving levees, and emergency notification and evacuation procedures.

Impacts from unmapped flooding, tsunami, and debris flow can be mitigated by taking these potential hazards into account during the project planning process, and ensuring that these hazards do not occur or can be mitigated to a less-than-significant level. Hazard reduction would be addressed, as applicable, in the site selection and design process for site-specific projects. LAUSD ~~PDF-SC-HWQ-4-4 through and PDF-SC-HWQ-4-5~~ would be incorporated into projects in flood zones. Impacts would be less than significant.

Impact 5.9-10: SUP-related projects may be subject to inundation by seiche, tsunami, or mudflow. [Threshold HWQ-10]

All SUP Projects

A seiche is a surface wave created when a body of water is shaken, usually by an earthquake. Seiches are of concern where water bodies (e.g., reservoirs) are located immediately adjacent to proposed development sites. CDE requirements specify a distance of 1,500 feet from a reservoir or dam. Dams and reservoirs are monitored during storm events and measures are implemented to prevent water overflow.

In addition to seiche hazards, new projects in the coastal zones of Central and South LAUSD areas (specifically Pacific Palisades, Venice, Westchester and San Pedro areas) could be subject to tsunami hazard according to the general criteria published by the National Oceanic and Atmospheric Administration (NOAA) and the California Emergency Management Agency (CalEMA).⁴⁰ Tsunamis are rare events, but can be catastrophic when they occur. The NOAA operates a tsunami warning system and provides assistance for tsunami hazard mitigation. Mitigation generally involves tsunami hazard awareness, attention to tsunami warning signs, and moving to higher ground if it is suspected that a tsunami is approaching.

The LAUSD Emergency Operations Plan (2010)⁴¹ identifies tsunami as a low risk hazard and indicated there are no LAUSD facilities in or near areas that have been identified to be vulnerable to the effects of a tsunami. Nevertheless, it is possible new projects may occur within the tsunami inundation zones identified on tsunami inundation zone map of coastal areas in Los Angeles County published by CalEMA.⁴² Based on general review of these maps, new school projects within up to 0.62 mile of the coast and below 100 feet elevation are potentially subject to tsunami inundation. However, site-specific review of the tsunami inundation zone

³⁹ Education Code Sections 17212, 17215.5; CCR, Title 5, Section 14010(g)

⁴⁰ NOAA. 2014. Center for Tsunami Research. <http://nctr.pmel.noaa.gov/index.html>.

⁴¹ LAUSD. 2010. Emergency Operations Plan, http://notebook.lausd.net/pls/ptl/docs/PAGE/CA_LAUSD/LAUSDNET/OFFICES/SCHOOL_OPS/SCHOOL_OPERATIONS_DIVISION/EMERGENCY_SERVICES/EMERGENCY_SERVICES_EMERGENCY_OPERATIONS_CENTER/LAUSD%20EOP%202010%20UPDATE.PDF.

⁴² Cal-EMA. 2014. Los Angeles County Tsunami Inundation Maps, with USGS 24k Quads. http://www.consrv.ca.gov/cgs/geologic_hazards/Tsunami/Inundation_Maps/LosAngeles/Pages/LosAngeles.aspx.

5. Environmental Analysis

HYDROLOGY AND WATER QUALITY

maps is required to determine actual tsunami inundation zones. Any new school project sites within tsunami inundation zones, as delineated by Cal-EMA or NOAA, shall be subject to preparation and implementation of a tsunami awareness program and evacuation plan. The tsunami awareness evacuation plan shall conform to the LAUSD Emergency Operations Plan as outlined in LAUSD ~~PDF-SC-HWQ-36~~.

The LAUSD Emergency Operations Plan meets the requirements of Los Angeles County's policies on Emergency Response and Planning. The LAUSD Plan also establishes an emergency organization to direct and control operations at all sites during a period of emergency by assigning responsibilities to specific personnel. In addition, the LAUSD Operations Plan:

- Conforms to the State mandated Standardized Emergency Management System and effectively restructures emergency response at all levels in compliance with the Incident Command System.
- Establishes response policies and procedures, providing Los Angeles Unified School District clear guidance for planning purposes.
- Describes and details procedural steps necessary to protect lives and property.
- Outlines coordination requirements.
- Provides a basis for unified training and response exercises to ensure compliance.

Projects constructed in or near the mouth of steep canyons in the Los Angeles area could be subject to debris flows. Debris flows can form rapidly, convey boulders, and be very destructive and hazardous. Although most large canyons have debris collection structures at their mouths to prevent this type of damage downstream, some of the smaller canyons may lack such protection. Most school projects would be in established urban areas far from the debris-producing areas in the mountains. However, it is possible some projects could be sited in areas subject to debris flows, particularly those north of the 210 freeway. LAUSD ~~PDF-SC-HWQ-46~~ would be incorporated into projects in potential debris flow zones. Impacts would be less than significant.

5.9.4 Applicable Regulations and Standard Conditions

Federal

- 33 U.S.C. Section 1251 et seq. (1972): Clean Water Act
- 33 U.S.C. Section 1342: National Pollutant Discharge Elimination System
- 42 U.S.C. Section 4001 et seq.: National Flood Insurance Act of 1968 and the Flood Disaster Protection Act of 1973

5. Environmental Analysis HYDROLOGY AND WATER QUALITY

State

- California Government Code, Section 53097: Local Drainage Requirements
- The Porter-Cologne Water Quality Act; California Water Code, Section 13000 et seq.
- Streambed Alteration Agreement; California Fish and Game Code, Section 1602 et seq.
- Waste Discharge Requirements, California Water Code, Section 13260
- Education Code, Sections 17212, 17215.5: School Siting Restriction in Floodplains
- CCR, Title 5, Section 14010(g): School Siting Restriction in Floodplains
- Statewide General NPDES Permit for Storm Water Discharges from Industrial Sites
- Statewide General NPDES Permit for Storm Water Discharges from Construction Sites
- Statewide Municipal Storm Water Permitting Program

Local

- Local Drainage Requirements
- Local Floodplain Development Requirements
- City or County Storm Drain System – Permits and Approvals

LAUSD Standard Conditions of Approval

- ~~Stormwater Technical Manual~~
- ~~Compliance Checklist and Contracting Protocol for Storm Water Requirements at Construction Sites~~
- ~~Emergency Operations Plan~~
- ~~Environmental Training Curriculum~~
- ~~Hazardous Waste Management Program~~
- ~~Medical Waste Management Program~~
- ~~Environmental Compliance Inspections~~
- ~~Safe School Inspections~~
- ~~Integrated Pest Management Program~~
- ~~Fats Oil and Grease Management Program~~
- ~~Solid Waste Management Program~~
- Project design Features: SC-HWQ-1 through HWQ 2, HWQ 3, and SC-HWQ-47

5.9.5 Level of Significance Before Mitigation

Upon implementation of regulatory requirements and LAUSD Standard Conditions listed above, the following impacts would be less than significant: 5.9-1, 5.9-2, 5.9-3, 5.9-4, 5.9-5, 5.9-6, 5.9-7, 5.9-8, 5.9-9, 5.9-10.

5. Environmental Analysis HYDROLOGY AND WATER QUALITY

5.9.6 Mitigation Measures

No mitigation measures are required.

5.9.7 Level of Significance After Mitigation

Impacts would be less than significant.

5. Environmental Analysis

5.10 LAND USE AND PLANNING

This section of the program EIR evaluates the potential for implementation of the SUP to impact land uses in the District. This section discusses ~~regulatory framework (plans and policies from several jurisdictional agencies and LAUSD Standard Conditions)~~ plans and policies from several jurisdictional agencies and LAUSD standard conditions, guidelines, specifications, practices, policies, and project design features (LAUSD Standards), along with existing land uses throughout the SUP area, and possible environmental impacts that may occur ~~as SUP-related site-specific projects are implemented during future phases of the SUP and site-specific projects implemented under the SUP.~~

Land use impacts can be either direct or indirect. Direct impacts result in land use incompatibilities, division of neighborhoods or communities, or interference with other land use plans, including habitat or wildlife conservation plans. This section focuses on direct land use impacts. Indirect impacts are secondary effects resulting from land use policy implementation, such as an increase in demand for public utilities or services, or increased traffic on roadways. Indirect impacts are addressed in other sections of this EIR.

5.10.1 Environmental Setting

5.10.1.1 REGULATORY FRAMEWORK

State, regional and local laws, regulations, plans, and guidelines are summarized below. The following regulatory framework discussion does not include all plans and policies that relate to land use and planning 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 date when a proposed site-specific school project undergoes review. Therefore, this section provides a general discussion of the most important plans and policies that apply to SUP-related projects. 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 potential impacts and significance thresholds. See *Applicable Regulations and Standard Conditions* at end of this chapter for those that require District compliance.

State

California Government Code, Section 65300

State planning law requires every city in California to adopt a comprehensive, long-term general plan for the physical development of the city, and of any land outside its boundaries (sphere of influence) that in the planning agency's judgment bears relation to its planning. A general plan should consist of an integrated and internally consistent set of goals and policies that are grouped by topic into a set of elements and are guided by a citywide vision. State law requires that a general plan address seven elements or topics (land use, circulation, housing, conservation, open space, noise, and safety), but allows some discretion on the arrangement and content.

5. Environmental Analysis

LAND USE AND PLANNING

California Education Code, Section 17251 and California Code of Regulations, Title 5, Section 14001 through 14012

Education Code Section 17251 and the CCR Title 5, Section 14001 through 14012 outline the California Department of Education's (CDE) authority for approving proposed school sites and constructing school buildings. CDE must approve each site in order for that site to receive State acquisition funds under the School Facilities Program administered by the State Allocation Board. According to the CDE School Site Selection and Approval Guide, some of the many factors that affect school site selection include health and safety, location, size, and surrounding land uses. The School Facilities Planning Division (SFPD) has developed screening and ranking procedures applied during the site selection process.¹

California Education Code, Section 38131.b

The **Civic Center Act** permits public use of school facilities. School facilities available for Civic Center use include gyms, playing fields, stadiums, auditoriums, multipurpose rooms, cafeterias, and classrooms. Facilities are available within designated time frames outside school hours. Organizations wishing to use a school location for a Civic Center use must apply for a permit from the District. A variety of rules, regulations, and restrictions governing the use of school buildings for civic center purposes appear in detail on the permit and the application.

Public Resources Code, Section 30000 et seq.

The **California Coastal Act of 1976** (Coastal Act) constitutes the California Coastal Management Program for the purposes of the Federal Coastal Zone Management Act. The Coastal Act established the California Coastal Commission (Coastal Commission), identified a designated California Coastal Zone, and established the Coastal Commission's responsibility to include the preparation and on-going oversight of a Coastal Plan for the protection and management of the Coastal Zone. Each local jurisdictional authority (city or county) with lands within the coastal zone is required to develop, and comply with, a coastal management plan.

The Coastal Act requires that any person or public agency proposing development within the Coastal Zone obtain a Coastal Development Permit (CDP) from either the Commission, or the city or county having the jurisdictional authority to issue a CDP.

New school construction in portions of the Central and South LAUSD areas could require a CDP. Any construction within the Coastal Zone must conform to the requirements of the California Coastal Act generally, and Chapter 3, Section 6 (Development) specifically. On or near the shoreline, coastal-dependent developments have priority over those uses not dependent on a coastal location. To comply with the Coastal Zone Management Act, localities develop Local Coastal Plans (LCPs). Local Coastal Plans in the District boundaries are:

- **West ESC Area ~~Local Districts~~**
 - Santa Monica Mountains Local Coastal Program, Los Angeles County (approved February 2014)

¹ California Department of Education. School Site Selection and Approval Guide. <http://www.cde.ca.gov/lr/fa/sf/schoolsiteguide.asp>

5. Environmental Analysis LAND USE AND PLANNING

- Marina Del Rey/Ballona Local Coastal Program, Los Angeles County
 - Playa Vista A Segment, Los Angeles County
 - City of Santa Monica Local Coastal Program
 - Pacific Palisades, City of Los Angeles
 - Venice, City of Los Angeles
 - Playa Vista, City of Los Angeles
 - Del Rey Lagoon Segment, City of Los Angeles
 - Airport/Dunes Segment, City of Los Angeles
 - City of El Segundo Local Coastal Program
- **South ESC Area Local District**
- City of Torrance Local Coastal Program
 - City of Long Beach Local Coastal Program
 - San Pedro Local Coastal Program, City of Los Angeles²

Regulatory Agencies

Federal

United States Forest Service

The Angeles National Forest stretches across Los Angeles County encompassing the San Gabriel Mountain Range; it is 1,018 square miles, or 25 percent of the land area of Los Angeles County. The U.S. Forest Service is responsible for managing public forest lands. Its mission is the stewardship of forest lands and resources through programs that provide recreation and multiple uses of natural resources, wilderness areas, and significant habitat areas. The U.S. Forest Service prepares and periodically updates the Land and Resource Management Plan as a policy guide for the use of lands in the national forests. Within the boundaries of the national forest, nearly 40,000 acres are privately owned. For these parcels, commonly referred to as in-holdings, the county retains responsibility for land use regulation. Part of the northeast portion of the District is in the Angeles National Forest.

National Park Service

The Santa Monica Mountains National Recreation Area (SMMNRA) is a part of the National Park System and is managed by the National Park Service. The SMMNRA preserves natural habitats and historical and cultural sites, offers recreational opportunities, and improves the air quality for the Los Angeles basin. Covered by chaparral, oak woodlands, and coastal sage scrub, it is home to many species that are listed as rare, threatened, or endangered. The eastern part of the SMMNRA is in the District.

² California Coastal Commission (CCC). 2013, November 25. Summary Of LCP Program Activity In FY 12-13. <http://www.coastal.ca.gov/lcp/LCPStatusSummFY1213.pdf>.

5. Environmental Analysis

LAND USE AND PLANNING

Regional

Southern California Association of Governments

The Southern California Association of Governments (SCAG) is a federally recognized Metropolitan Planning Organization (MPO) that encompasses over 38,000 square miles and represents the Counties of Los Angeles, Orange, Ventura, Imperial, San Bernardino, and Riverside and 191 cities. SCAG is a regional planning agency and a forum for addressing regional issues concerning transportation, the economy, community development, and the environment.³ SCAG is also the regional clearinghouse for projects requiring environmental documentation under federal and state law. In this role, SCAG reviews proposed development and infrastructure projects to analyze their impacts on regional planning programs. As the Southern California region's MPO, SCAG cooperates with the Southern California Air Quality Management District (SCAQMD), the California Department of Transportation (Caltrans), and other agencies in preparing regional planning documents. Los Angeles County is further divided into nine SCAG subregions:

- North Los Angeles County
- City of Los Angeles
- San Fernando Valley Council of Governments
- Las Virgenes Malibu Conejo Council of Governments
- Arroyo Verdugo Council of Governments
- Westside Cities Council of Governments
- South Bay Cities Council of Governments
- San Gabriel Valley Council of Governments
- Gateway Cities Council of Governments

The District encompasses all of the Central Los Angeles subregion, all but the northwest corner of the San Fernando Valley Subregion, and parts of the remaining seven subregions.⁴

Regional Transportation Plan/Sustainable Communities Strategy

On April 4, 2012, SCAG adopted the 2012–2035 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS): Towards a Sustainable Future. SCAG has placed a greater emphasis than ever on sustainability and integrated planning in the 2012–2035 RTP/SCS. The 2012–2035 RTP/SCS vision encompasses three principles that collectively work as the key to the region's future: mobility, economy, and sustainability. The 2012–2035 RTP/SCS includes a strong commitment to reduce emissions from transportation sources to comply with Senate Bill 375, improve public health, and meet the National Ambient Air Quality Standards as set forth by the federal Clean Air Act. The 2012–2035 RTP/SCS provides a blueprint for improving quality of life for residents by providing more choices for where they will live, work, and play, and how they will move around.

³ SCAG. <http://www.scag.ca.gov/Documents/scagGeneral2013.pdf>

⁴ Metropolitan Transportation Authority of Los Angeles County (Metro). 2008, April 30. Multi-County Goods Movement Action Plan: Los Angeles County Action Plan. http://media.metro.net/projects_studies/mcgmap/images/04.1_Vol1_LA_County_AP_043008.pdf.

5. Environmental Analysis LAND USE AND PLANNING

Compass Blueprint Strategy

In 2004, SCAG adopted a regional growth strategy known as the Compass Blueprint Strategy (Compass Blueprint). The Compass Blueprint is the part of the 2004 regional growth forecast policy that attempts to reduce emissions and increase mobility through strategic land use changes. Through public participation, land use, and transportation modeling and analysis, Compass Blueprint has resulted in a plan that identifies strategic growth opportunity areas where the program will help cities and counties reap the maximum benefits from regional planning implemented in cooperation and partnership with the local community. Compass Blueprint tools support visioning efforts, infill analyses, economic and policy analyses, and marketing and communication programs. The Compass Blueprint Growth Vision contains a set of land use strategies that SCAG encourages local governments to implement, many of which are applicable to Los Angeles County. Applicable strategies focus growth in existing and emerging centers and along major transportation corridors; create significant areas of mixed-use development and walkable, “people scaled” communities; provide new housing opportunities that respond to the region’s changing demographics; target growth in housing, employment, and commercial development within walking distance of existing and planned transit stations; inject new life into underused areas by creating vibrant new business districts, redeveloping old buildings, and building new businesses and housing on vacant lots; preserve existing, stable, single family neighborhoods; and protect important open space, environmentally sensitive areas and agricultural lands from development.

Local

A County and city general plans are basic planning documents and act as a blueprint for future development. A general plan describes a community’s development goals and policies. It also is the foundation for land use decisions made by the planning commission, city council, or board of supervisors.

County and city zoning codes establish detailed requirements that implement the general plan policies at the level of the individual parcel of land. The zoning code presents development standards for different land uses and identifies which uses are allowed in the various zoning districts of a jurisdiction. California law requires the zoning codes to be consistent with the jurisdiction’s general plan.

Los Angeles County

The Los Angeles County General Plan was adopted in 1980. A comprehensive update of the General Plan is in preparation. Community plans are components of the Los Angeles County General Plan and are intended to provide focused goals, policies, and maps to guide the regulation of development within specified areas of unincorporated portions of the county.⁵

The following county community plan areas are within the District:

- **Northwest Local District-ESC Area:**
 - Santa Monica Mountains North Area Plan (part)

⁵ Los Angeles County Department of Regional Planning (DRP). 2012, November 27. Santa Clarita Valley Area Plan. Introduction. http://planning.lacounty.gov/assets/upl/project/ovov_2012-ch_00-01_intro.pdf.

5. Environmental Analysis

LAND USE AND PLANNING

- ~~Santa Clarita Valley Area Plan (part)~~
- ~~Twin Lakes Neighborhood Plan⁶~~

- ~~**Northeast Local District:**~~
 - ~~Santa Clarita Valley Area Plan (part)~~

 -

- ~~**West ESC Area Local District**~~
 - Santa Monica Mountains North Area Plan (part)
 - ~~Marina Del Rey Land Use Plan and Marina Del Rey Specific Plan~~
 - ~~West Athens/Westmont Community Plan⁷~~

 -

- ~~**East ESC Area Local District**~~
 - ~~East Los Angeles Community Plan~~
 - ~~Walnut Park Neighborhood Plan⁸~~
 - ~~**South ESC Area**~~
 - ~~Walnut Park Neighborhood Plan⁹~~
 - ~~West Athens/Westmont Community Plan¹⁰~~

The Los Angeles County Zoning Code is in Title 22, *Planning and Zoning*, of the Los Angeles County Code of Ordinances.¹¹

City of Los Angeles

The City of Los Angeles General Plan, adopted in 2001, consists of 12 elements, including the 7 state-mandated elements. Community plans guide the physical development of neighborhoods by establishing the goals and policies for land use. The land use element is one of the state-required elements of a city's general plan and is required to be updated periodically. The general plan sets out a long-range vision and guide to future development for the City of Los Angeles, and 35 community plans provide the specific, neighborhood-level detail, relevant policies, and implementation strategies necessary to achieve the general plan objectives.

⁶ The Community of Twin Lakes in unincorporated Los Angeles County is in the San Fernando Valley near the junction of the State Route 118 freeway (SR-118) and Topanga Canyon Boulevard (SR-27).

⁷ Los Angeles County Department of Regional Planning (DRP). 2014, March 11. Plans & Ordinances: Adopted Plans. <http://planning.lacounty.gov/plans/adopted>.

⁸ ~~The Community of Walnut Park in unincorporated Los Angeles County is bounded by the City of Huntington Park to the north and east and the City of South Gate to the south.~~

⁹ ~~The Community of Walnut Park in unincorporated Los Angeles County is bounded by the City of Huntington Park to the north and east and the City of South Gate to the south.~~

¹⁰ Los Angeles County Department of Regional Planning (DRP). 2014, March 11. Plans & Ordinances: Adopted Plans. <http://planning.lacounty.gov/plans/adopted>.

¹¹ <https://library.municode.com/index.aspx?clientId=16274>.

5. Environmental Analysis LAND USE AND PLANNING

Community plan areas by LAUSD ~~Educational Service Center~~Local District area are listed in Table 5.10-1. Where a community plan area spans two or more ~~ESC areas~~Local Districts – and the majority of the community plan area is in one Local District –, it is listed under the ~~ESC area~~Local District with the greatest portion of the community plan area.

5. Environmental Analysis

LAND USE AND PLANNING

Table 5.10-1 City of Los Angeles Community Plan Areas by LAUSD Educational Service Center/Local District

ESC Area/Local District					
Northwest	Northeast	West	Central	East	South
Granada Hills - Knollwood Sylmar	Sylmar - Pacific Palisades Brentwood - Pacific Palisades	Brentwood - Pacific Palisades Brentwood - Pacific Palisades	Silver Lake - Echo Park - Elysian Valley Silver Lake - Echo Park - Elysian Valley	Northeast Los Angeles Northeast Los Angeles	Southeast Los Angeles Southeast Los Angeles
Chatsworth - Porter Ranch Granada Hills - Knollwood	Arlington - Pacoima Bel Air - Beverly Crest	Bel Air - Beverly Crest Bel Air - Beverly Crest	Westlake Silver Lake - Echo Park - Elysian Valley Westlake Silver Lake - Echo Park - Elysian Valley	Central City North Central City North	South Los Angeles Harbor Gateway South Los Angeles Harbor Gateway
Northridge Chatsworth - Porter Ranch	Sunland - Tujunga - Lake View Terrace - Shadow Hills - East La Tuna Canyon Sunland - Tujunga - Lake View Terrace - Shadow Hills - East La Tuna Canyon Hollywood	Hollywood Hollywood	Central City Westlake Central City Westlake	Boyle Heights Boyle Heights	Harbor Gateway - Wilmington - Harbor City Harbor Gateway - Wilmington - Harbor City
Canoga Park - Winnetka - Woodland Hills - West Hills Northridge	Van Nuys - North Sherman Oaks Westwood	Westwood Westwood	South Los Angeles Central City North South Los Angeles Central City North		Wilmington - Harbor City San Pedro Wilmington - Harbor City San Pedro
Reseda - West Van Nuys Arlington - Pacoima	North Hollywood - Valley Village Wilshire	Wilshire Wilshire	Southeast Los Angeles Central City Southeast Los Angeles Central City		San Pedro Port of Los Angeles San Pedro Port of Los Angeles
Encino - Tarzana Sunland - Tujunga - Lake View Terrace - Shadow Hills - East La Tuna Canyon	Sherman Oaks - Studio City - Toluca Lake - Cahuenga Pass West Los Angeles	West Los Angeles West Los Angeles	Boyle Heights Boyle Heights		Port of Los Angeles Port of Los Angeles
Canoga Park - Winnetka - Woodland Hills - West Hills	Palms - Mar Vista - Del Rey Palms - Mar Vista - Del Rey	Palms - Mar Vista - Del Rey Palms - Mar Vista - Del Rey			
Reseda - West Van Nuys	Venice Venice	Venice Venice			
Van Nuys - North Sherman Oaks	Westchester - Playa del Rey Westchester - Playa del Rey	Westchester - Playa del Rey Westchester - Playa del Rey			
North Hollywood - Valley Village	West Adams - Baldwin Hills - Leimert West Adams - Baldwin Hills - Leimert	West Adams - Baldwin Hills - Leimert West Adams - Baldwin Hills - Leimert			
Encino - Tarzana	South Los Angeles South Los Angeles	South Los Angeles South Los Angeles			
Sherman Oaks - Studio City - Toluca Lake - Cahuenga Pass					

Source: City of Los Angeles Department of City Planning, 2014, January, Community Plan Areas. http://cityplanning.lacity.org/MapGallery/Image/Citywide/CPA_apc.pdf.

Chapter 1 of the Los Angeles Municipal Code, *General Provisions and Zoning*, describes the powers and duties of the city's planning department and specifies the city's zoning districts and permitted land uses and development standards within each district.

5. Environmental Analysis

LAND USE AND PLANNING

Neighborhood Councils

Neighborhood councils are city-certified local groups made up of people who live, work, own property, or have some other connection to a neighborhood. Neighborhood council board members are elected or selected for their positions by the neighborhoods themselves. Neighborhood council board size varies from 7 to over 30 persons. They hold regular meetings—at least one every three months. A neighborhood council can adopt community impact statements that summarize its official position on city issues and have them printed directly on the agendas for meetings of the city council and city agencies. There are 95 neighborhood councils in the City of Los Angeles.¹²

Other Cities

Each of the other cities wholly or partly in the District has an adopted general plan. The year of adoption of each city's general plan is listed below. Where various elements of a city's general plan were adopted in different years, the year listed is when the land use element was adopted.

■ **Northeast Local District ESC Area**

- City of San Fernando 1987

■ **West Local District ESC Area**

- City of Santa Monica 2010
- City of Beverly Hills 2010
- City of West Hollywood 2011
- City of El Segundo 1992
- City of Inglewood 1980
- City of Hawthorne 1989

■ **East Local District ESC Area**

- City of Monterey Park 2001
- City of Montebello 1973
- ~~City of Commerce 2008~~
- ~~City of Vernon 2007~~
- ~~City of Maywood 2009~~
- ~~City of Huntington Park 1991~~
- ~~City of Bell 1996~~
- ~~City of Cudahy 1992~~
- ~~City of South Gate 2009~~
- ~~City of Commerce 2008~~
- ~~City of Bell Gardens 1995~~
- ~~City of Downey 2005~~
- City of Lynwood 2003

¹² City of Los Angeles Department of Neighborhood Empowerment (DONE). 2014, March 12. About Neighborhood Councils. <http://empowerla.org/about-neighborhood-councils/>.

5. Environmental Analysis

LAND USE AND PLANNING

■ South Local District ESC Area

- ~~City of Vernon 2007~~
- ~~City of Maywood 2009~~
- ~~City of Huntington Park 1991~~
- ~~City of Bell 1996~~
- ~~City of Cudahy 1992~~
- ~~City of South Gate 2009~~
- ~~City of Commerce 2008~~
- ~~City of Bell Gardens 1995~~
- ~~City of Downey 2005~~
- City of Lynwood 2003
- City of Carson 2004
- City of Gardena 2006
- City of Lomita 1989
- City of Long Beach 1989
- City of Rancho Palos Verdes 1975
- City of Torrance 2010¹³

General Plans and Zoning Codes

Under a general plan and/or zoning ordinance, schools in a particular area will be (1) permitted by right, (2) not permitted, or (3) “conditionally permitted.” If schools are permitted by right, then a school district need take no action to comply with the general plan or zoning ordinance.

Under State law, a school district must submit to the local planning agency the location, purpose, and extent of each proposed school use.¹⁴ The planning agency may either approve the location, purpose, and extent of a proposed school use as being in conformity with the general plan, or disapprove it as not being in conformity with the general plan.

Although most school property is owned by the District, the underlying city or county zoning can be residential, industrial, commercial, or other designations. Potential new school properties typically are zoned for residential or other uses. The California legislature granted school districts the power to exempt school property from county and city zoning requirements, provided the school district complies with the terms of Government Code Section 53094.¹⁵ As lead agency for the SUP, it is anticipated that the District will comply

¹³ Governor’s Office of Planning and Research (OPR). 2012, May 3. Annual Planning Survey Results 2012. http://www.opr.ca.gov/docs/2012_APSR.pdf.

¹⁴ Government Code Section 65402(c)

¹⁵ Government Code Section 53094.

(a) Notwithstanding any other provision of this article, this article does not require a school district to comply with the zoning ordinances of a county or city unless the zoning ordinance makes provision for the location of public schools and unless the city or county has adopted a general plan.

(b) Notwithstanding subdivision (a), the governing board of a school district, that has complied with the requirements of Section 65352.2 of this code and Section 21151.2 of the Public Resources Code, by a vote of two-thirds of its members, may render a city or county zoning ordinance inapplicable to a proposed use of property by the school district. The governing board of the school

5. Environmental Analysis LAND USE AND PLANNING

with Government Code Section 53094 to render the local county and city zoning ordinances inapplicable to site-specific school projects under the SUP to the extent such ordinances would not otherwise permit the proposed school use for these projects. Following a two-thirds vote of the Board of Education, the District can exempt a school site from such local zoning requirements. Within 10 days of the action, the Board must provide the affected County and/or cities with notice of this action.

5.10.1.2 EXISTING CONDITIONS

The District extends north to the San Gabriel Mountains in the Angeles National Forest; west to the Ventura County boundary and to the Pacific Ocean, including the communities of Venice, Marina Del Rey, and Playa Del Rey in the City of Los Angeles; east to the community of East Los Angeles in unincorporated Los Angeles County; and south to the community of San Pedro in the City of Los Angeles, and parts of the cities of Rancho Palos Verdes and Rolling Hills Estates in the Palos Verdes Peninsula. This includes most of the city of Los Angeles, along with all or portions of 31 cities and unincorporated areas of Los Angeles County (see Figure 3-2, Local Vicinity). Existing land uses in the district include, but are not limited to: residential, industrial, transportation, commercial and services, educational institutions, open space and recreation, and public facilities.

5.10.2 Thresholds of Significance

According to CEQA Guidelines Appendix G a project would normally have a significant effect on the environment if the project would:

- LU-1 Physically divide an established community.
- LU-2 Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect.
- LU-3 Conflict with any applicable habitat conservation plan or natural community conservation plan.

5.10.3 Environmental Impacts

The applicable thresholds are identified in brackets after the impact statement.

district may not take this action when the proposed use of the property by the school district is for nonclassroom facilities, including, but not limited to, warehouses, administrative buildings, and automotive storage and repair buildings.

(c) The governing board of the school district shall, within 10 days, notify the city or county concerned of any action taken pursuant to subdivision (b).

5. Environmental Analysis

LAND USE AND PLANNING

Impact 5.10-1: SUP implementation would not divide established communities. [Threshold LU-1]

New Construction on New Properties

Property acquisition under the SUP would improve campuses serving the students and staff at that school. . When expansion is proposed, the LAUSD considers the extent that the expanded campus would affect the established community. School sites, unlike highways, transmission lines, and other aboveground infrastructure, do not have a physical presence that would divide established communities. Moreover, schools already are attended by members of the community and would therefore continue to serve as important places of community interaction. Neighborhood schools are an integral part of the surrounding community, and therefore do not create or constitute physical divisions. Impacts would be less than significant.

New Construction and Modernizations on Existing School Campus

New construction, modernization, repair, replacement, upgrade, remodel, renovation and installation projects would be located on existing developed campuses. Projects on existing school campuses would not divide established communities surrounding the schools, and no impact would occur.

Impact 5.10-2: SUP implementation would not conflict with applicable plans adopted for the purpose of avoiding or mitigating an environmental effect. [Threshold LU-2]

All SUP Projects

Selected goals of the Regional Transportation Plan/Sustainable Communities Strategy—and SUP consistency with such goals—are shown in Table 5.10-2. The SUP would be consistent with the RTP/SCS, as shown in the table.

Table 5.10-2 SUP Consistency with Regional Transportation Plan/Sustainable Communities Strategy Goals

RTP/SCS Goal	SUP Consistency
Protect the environment and health of our residents by improving air quality and encouraging active transportation (non-motorized transportation, such as bicycling and walking).	One of the objectives of the SUP is to provide school capacity in neighborhoods so that children in existing residential areas can attend schools within walking and/or bicycling distance of home.
Actively encourage and create incentives for energy efficiency, where possible.	All SUP projects would meet California Code of Regulations Title 24 energy-efficiency standards.
Encourage land use and growth patterns that facilitate transit and non-motorized transportation.	SUP objectives include providing schools in neighborhoods within walking and/or bicycling distance of students' homes.

Source: Southern California Association of Governments (SCAG). 2012, April. 2012-2035 Regional Transportation Plan/Sustainable Communities Strategy. <http://rtpscs.scag.ca.gov/Documents/2012/final/f2012RTPSCS.pdf>.

SUP consistency with other regional plans adopted for the purpose of avoiding or mitigating an environmental effect is evaluated in sections of Chapter 5 of this EIR addressing specific resources: for instance, consistency with the South Coast Air Quality Management District's air quality management plan is assessed in Section 5.3, *Air Quality*.

5. Environmental Analysis LAND USE AND PLANNING

No sites for expanded schools to be developed under the SUP have been identified. However, in compliance with CDE site selection standards, LAUSD would consider the surrounding land uses and compatibility with a school campus. Because the safety of the students and staff is essential, schools would not be expanded in areas where the school would conflict with existing plans that avoid or mitigate an environmental effect.

Development projects within the Coastal Zone are required to conform to the requirements of the California Coastal Act generally, and Chapter 3, Section 6 (Development) specifically. To comply with the Coastal Zone Management Act, localities develop Local Coastal Plans (LCPs). Local Coastal Plans in the District boundaries are:

■ **West Local District ~~ESC~~ Area:**

- Santa Monica Mountains Local Coastal Program, Los Angeles County (approved February 2014)
- Marina Del Rey/Ballona Local Coastal Program, Los Angeles County
- Playa Vista A Segment, Los Angeles County
- City of Santa Monica Local Coastal Program
- Pacific Palisades, City of Los Angeles
- Venice, City of Los Angeles
- Playa Vista, City of Los Angeles
- Del Rey Lagoon Segment, City of Los Angeles
- Airport/Dunes Segment, City of Los Angeles
- City of El Segundo Local Coastal Program

■ **South Local District ~~ESC~~ Area**

- City of Torrance Local Coastal Program
- City of Long Beach Local Coastal Program
- San Pedro Local Coastal Program, City of Los Angeles¹⁶

As discussed above, although most school property is owned by the District, the underlying city or county zoning can be residential, industrial, commercial, or other designations and may also have LCP designations. Potential new school properties typically are zoned for residential or other uses. Additionally, potential adjacent parcels that may be acquired for school expansion may have LCP designations.

The California legislature granted school districts the power to exempt school property from county and city zoning requirements, provided the school district complies with the terms of Government Code Section 53094.¹⁷ As lead agency for the SUP, it is anticipated that the District will comply with Government

¹⁶ California Coastal Commission (CCC). 2013, November 25. Summary Of LCP Program Activity In FY 12-13. <http://www.coastal.ca.gov/lcp/LCPStatusSummFY1213.pdf>.

¹⁷ Government Code Section 53094.

(a) Notwithstanding any other provision of this article, this article does not require a school district to comply with the zoning ordinances of a county or city unless the zoning ordinance makes provision for the location of public schools and unless the city or county has adopted a general plan.

(b) Notwithstanding subdivision (a), the governing board of a school district, that has complied with the requirements of Section 65352.2 of this code and Section 21151.2 of the Public Resources Code, by a vote of two-thirds of its members, may render a city or county zoning ordinance inapplicable to a proposed use of property by the school district. The governing board

5. Environmental Analysis

LAND USE AND PLANNING

Code Section 53094 to render the local county and city zoning ordinances inapplicable to site-specific school projects under the SUP to the extent such ordinances would not otherwise permit the proposed school use for these projects. Following a two-thirds vote of the Board of Education, the District can exempt a school site from such local zoning requirements. Within 10 days of the action, the Board must provide the affected County and/or cities with notice of this action. As part of the SUP, the District plans to exempt all existing schools from local jurisdiction zoning regulations. Following this process, SUP-related projects would not conflict with plans or policies for projects on existing school grounds. New Construction on New Property would comply with Section 53094.

If property acquisition and building construction is planned within the LCP the District is required to apply for and obtain a Coastal Development Permit through the City or County. Following this process, SUP-related projects in the coastal zone would not conflict with plans or policies.

Impact 5.10-3: The SUP would not conflict with the adopted Habitat Natural Communities Conservation Plan. [Threshold LU-3]

All SUP Projects

Small parts of the southwest corner of the District are in the Palos Verdes Peninsula Natural Communities Conservation Plan/Habitat Conservation Plan (NCCP/HCP). No habitat reserves established under the HCCP/NCP are within the District, and no other habitat conservation plans are in the District. SUP implementation would not conflict with the Palos Verdes Peninsula NCCP/HCP, and no impact would occur.

5.10.4 Applicable Regulations and Standard Conditions

State

- Education Code Section 17251
- California Code of Regulations, Title 5, Section 14001 through 14012
- California Education Code Section 38131.b: Civic Center Act
- California Coastal Act of 1976, PRC Section 30000 et seq.

5.10.5 Level of Significance Before Mitigation

Upon implementation of regulatory requirements ~~and LAUSD Standards~~ listed above, the following impacts would be less than significant: 5.10-1, 5.10-2, and 5.10-3.

5.10.6 Mitigation Measures

No mitigation measures are required.

-
- of the school district may not take this action when the proposed use of the property by the school district is for nonclassroom facilities, including, but not limited to, warehouses, administrative buildings, and automotive storage and repair buildings.
- (c) The governing board of the school district shall, within 10 days, notify the city or county concerned of any action taken pursuant to subdivision (b).

5. Environmental Analysis LAND USE AND PLANNING

5.10.7 Level of Significance After Mitigation

Impacts would be less than significant.

5. Environmental Analysis

LAND USE AND PLANNING

This page intentionally left blank.

5. Environmental Analysis

5.11 MINERAL RESOURCES

This section of the program EIR evaluates the potential for implementation of the SUP to impact mineral resources in the District. This section discusses plans and policies from several jurisdictional agencies along with the existing mineral resources throughout the SUP area, and possible environmental impacts that may occur ~~as SUP-related site-specific projects are implemented, during future phases of the SUP and site-specific projects implemented under the SUP.~~

TERMINOLOGY

Minerals are defined as any naturally occurring chemical elements or compounds, formed from inorganic processes and organic substances.

Minable minerals or an “ore deposit” is defined as a deposit of ore or mineral having a value materially in excess of the cost of developing, mining and processing the mineral and reclaiming the project area.

Fossil Fuel Resources. Fossil fuel resources are oil, natural gas, and coal. There are no coal mines in Los Angeles County; thus, the discussion of fossil fuel resources in this section focuses on oil and natural gas.

Mineral Resources. Natural mineral deposits are nonrenewable resources that cannot be replaced once they are depleted. Mineral resources include rock, sand, gravel, and fossil fuel resources such as oil and natural gas. The primary mineral resources within the Los Angeles Basin are rock, gravel, and sand deposits.

Mineral Resource Sectors. Areas where mineral resources of regional or statewide significance are considered to be present or likely to be present and that have current land uses deemed compatible with potential mining.

Mineral Resource Zones (MRZ). Land classification by presence, potential presence, or absence of sand and gravel—that is, aggregate mineral resources.

Portland Cement Concrete (PCC)-Grade Aggregate is aggregate suitable for use in Portland Cement Concrete (PCC), the type of concrete most often used in construction. Portland cement, the cement used in such concrete, consists of a ground-up mixture of limestone, gypsum, and clay.

Production-Consumption Region (P-C Region). An aggregate production district plus the market or consumption area for the aggregate produced.

Portland Cement Concrete (PCC)-Grade Aggregate Reserves. Aggregate that has been determined to be acceptable for commercial use, is in properties owned or leased by aggregate-producing companies, and for which permits have been issued allowing mining and processing of the material.

Portland Cement Concrete (PCC)-Grade Aggregate Resources. Include reserves and all of the potentially usable aggregate materials that may be mined in the future, but for which no permit allowing mining has been issued, or for which marketability has not yet been established.

5. Environmental Analysis

MINERAL RESOURCES

Mineral Resource Classification

The California Geological Survey Mineral Resources Project provides information about California's nonfuel mineral resources. The Mineral Resources Project classifies lands throughout the state that contain regionally significant mineral resources as mandated by the Surface Mining and Reclamation Act (SMARA) of 1975.¹ Nonfuel mineral resources include metals such as gold, silver, iron, and copper; industrial metals such as boron compounds, rare-earth elements, clays, limestone, gypsum, salt, and dimension stone; and construction aggregate including sand, gravel, and crushed stone. Development generally results in a demand for minerals, especially construction aggregate. SMARA requires all cities and counties to incorporate in their general plans the mineral designations approved by the State Mining and Geology Board.

The classification process involves the determination of Production-Consumption (P-C) Region boundaries, based on identification of active aggregate operations (Production) and the market area served (Consumption). The P-C Regional boundaries are modified to include only the portions of the region that are urbanized or urbanizing and are classified for their aggregate content. An aggregate appraisal further evaluates the presence or absence of significant sand, gravel, or stone deposits that are suitable sources of aggregate. The classification of these mineral resources is a joint effort of the state and the local governments. It is based on geologic factors and requires that the State Geologist classify the mineral resources area as one of the four Mineral Resource Zones (MRZs), Scientific Resource Zones (SZ), or Identified Resource Areas (IRAs), described below.

- **MRZ-1:** An MRZ where adequate information indicates that no significant mineral deposits are present or likely to be present.
- **MRZ-2:** An MRZ where adequate information indicates that significant mineral deposits are present or a likelihood of their presence and development should be controlled.
- **MRZ-3:** An MRZ where the significance of mineral deposits cannot be determined from the available data.
- **MRZ-4:** An MRZ where there is insufficient data to assign any other MRZ designation.
- **SZ Areas:** Scientific Resource Zones containing unique or rare occurrences of rocks, minerals, or fossils that are of outstanding scientific significance shall be classified in this zone.
- **IRA Areas:** County or State Division of Mines and Geology Identified Resource Areas where adequate production and information indicates that significant minerals are present.

As part of the classification process, an analysis of site specific conditions is utilized to calculate the total volume of aggregates within individually identified Resource Sectors. Resource Sectors are those MRZ-2 areas identified as having regional or statewide significance. Anticipated aggregate demand in the P-C Regions

¹ California Public Resources Code, Sections 2710–2796.

5. Environmental Analysis MINERAL RESOURCES

for the next 50 years is then estimated and compared to the total volume of aggregate reserves identified within the P-C Region.

5.11.1 Environmental Setting

5.11.1.1 REGULATORY FRAMEWORK

State and local laws and regulations are summarized below. The following regulatory framework discussion does not include all plans and policies that relate to minerals 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 date when a proposed site-specific school project undergoes review. Therefore, this section provides a general discussion of the most important plans and policies that apply to SUP-related projects. Although these are not directly applicable to the SUP or site-specific projects implemented under the SUP, they are included to assist in identifying potential impacts and significance thresholds. See *Applicable Regulations and Standard Conditions* at end of this chapter for those that require District compliance.

State

California Public Resources Code, Sections 2710 et seq.

The Surface Mining and Reclamation Act of 1975 (SMARA) is the primary regulator of on-shore surface mining in the state. It delegates specific regulatory authority to local jurisdictions. The act requires the state geologist (California Geological Survey) to identify all mineral deposits within the state and to classify them as: (1) containing little or no mineral deposits; (2) significant deposits; or (3) deposits identified but further evaluation needed; lands where such deposits are identified are designated Mineral Resource Zones (MRZ) 1, 2, or 3, respectively. Local jurisdictions are required to enact specific procedures to guide mineral conservation and extraction at particular sites and to incorporate mineral resource management policies into their general plans. A particular concern of the state legislators in enacting SMARA was premature loss of minerals and protection of sites threatened by development practices that might preclude future mineral extraction.

Local

City of Los Angeles Municipal Code, Section 13.03

The City of Los Angeles adopted the 'G' Surface Mining supplemental use provisions in 1975, which, with subsequent amendments, have brought the city's provisions into consistency with new state requirements. The 'G' provisions are land use, not mineral conservation regulations. They regulate the establishment of sand and gravel districts, extraction operations, mitigation of potential noise, dust, traffic, and other potential impacts, as well as post-extraction site restoration. Other conditions may be imposed by the city if deemed appropriate.²

² City of Los Angeles 2001.

5. Environmental Analysis

MINERAL RESOURCES

5.11.1.2 EXISTING CONDITIONS

Regional Setting

The state geologist classified MRZ-2 sites within Los Angeles. MRZ-2 sites contain potentially significant sand and gravel deposits that are to be conserved. Any proposed development plan must consider access to the deposits for purposes of extraction. Much of the area within the MRZ-2 sites in Los Angeles was developed with structures prior to the MRZ-2 classification, and therefore is unavailable for extraction.³

Mineral Production

California is divided into 12 districts for the purpose of reporting minerals production statistics in the Minerals Yearbook published by the US Geological Survey. The most recent yearbook available is for 2009, published in August 2013. Los Angeles County, Ventura County, and Orange County make up District 11. Minerals production in District 11 in 2009 is summarized in Table 5.11-1.⁴

Table 5.11-1 District 11 Mineral Production

Mineral Type	Production, metric tons	Production, dollar value
Concrete aggregate and concrete products	5,580,000	\$68,700,000
Asphaltic concrete aggregates and road base materials	575,000	\$3,910,000
Other miscellaneous uses	302,000	\$3,000,000
Unspecified	4,960,000	\$59,000,000
Other production materials	184,000	\$2,340,000
Total	11,601,000	\$136,950,000

Source: United States Geological Survey (USGS). 2013, August. 2009 Minerals Yearbook: California. <http://minerals.usgs.gov/minerals/pubs/state/2009/myb2-2009-ca.pdf>. One metric ton is 2,205 pounds.

Aggregate Reserves Compared to Aggregate Demand

1994 Mineral Land Classification, Los Angeles County

The 1994 Mineral Land Classification for Los Angeles County identified the reserves, resources, and forecast 50-year aggregate demands, shown in Table 5.11-2.

Table 5.11-2 Los Angeles County Aggregate Supply and Demand

Category	Tons
Portland Cement Concrete (PCC) Resources	11.9 billion
PCC-grade aggregate reserves	750 million
50-year demand, all aggregate	2.01 billion
50-year demand, PCC-grade aggregate	1.11 billion

Source: California Geological Survey (CGS). 1994. Update of Mineral Land Classification of Portland Cement Concrete Aggregate in Ventura, Los Angeles, and Orange Counties, California. Part II – Los Angeles County. ftp://ftp.consrv.ca.gov/pub/dmg/pubs/ofr/OFR_94-14/OFR_94-14_Text.pdf.

³ City of Los Angeles. 2001, September 26. Conservation Element of the City of Los Angeles General Plan. <http://cityplanning.lacity.org/cwd/gnlpln/consvelt.pdf>.

⁴ United States Geological Survey (USGS). 2013, August. 2009 Minerals Yearbook: California. <http://minerals.usgs.gov/minerals/pubs/state/2009/myb2-2009-ca.pdf>.

5. Environmental Analysis MINERAL RESOURCES

2010 Mineral Land Classification, San Gabriel Valley Production-Consumption Region

PCC-grade aggregate resources, reserves, and forecast 50-year demands in the San Gabriel Valley P-C Region are summarized below in Table 5.11-3. As shown, PCC-grade aggregate reserves in that production – consumption region are forecast to be depleted by 2028.

Table 5.11-3 San Gabriel Valley Aggregate Supply and Demand

Category	Tons
PCC-grade aggregate reserves	328 million
50-year demand, PCC-grade aggregate	638 million
Estimated Depletion of PCC-Grade Aggregate Reserves	Year 2028

Source: California Geological Survey (CGS). 2010a. Update of Mineral Land Classification for Portland Cement Concrete-Grade Aggregate in the San Gabriel Valley Production-Consumption Region, Los Angeles County, California. ftp://ftp.consrv.ca.gov/pub/dmg/pubs/sr/SR_209/SR_209_Text.pdf.

Oil and Natural Gas Production

Oil production in Los Angeles County in 2012 was about 24 million barrels (1 barrel = 42 U.S. gallons). Natural gas production in Los Angeles County in 2012 was about 18.5 billion cubic feet. There were 3,690 active oil and gas wells in the county in 2012.⁵

District Setting

Mineral Resource Zones

The District is in the San Gabriel Valley, San Fernando Valley, Simi Valley, and Saugus-Newhall P-C Regions (see Figure 5.11-1, *Mineral Zones*). There are MRZ-2 areas in the following parts of the District:

- In the San Gabriel Valley P-C Region in the central Los Angeles area
- In the San Fernando Valley P-C Region in a swath of the east-central San Fernando Valley extending from North Hollywood to north and east of the City of San Fernando. The northern end of this area has two branches, one extending north along Pacoima Wash and the other extending east along Tujunga Wash^{6,7,8}.

There are no MRZ-2 areas in the parts of the Saugus-Newhall or Simi Valley P-C Regions that are in the District.

⁵ Division of Oil, Gas, and Geothermal Resources (DOGGR). 2013, September 20. Well Counts and Production of Oil, Gas, and Water by County – 2012. <http://www.conservation.ca.gov/dog/Documents/2012%20Oil%20and%20Gas%20Production%20by%20County.pdf>.

⁶ California Geological Survey (CGS). 2010a. Update of Mineral Land Classification for Portland Cement Concrete-Grade Aggregate in the San Gabriel Valley Production-Consumption Region, Los Angeles County, California. Plate 1. San Gabriel Valley P-C Region Showing MRZ-2 Areas and Active Mine Operations. ftp://ftp.consrv.ca.gov/pub/dmg/pubs/sr/SR_209/Plate%201.pdf.

⁷ California Geological Survey (CGS). 1994a. Generalized Mineral Land Classification Map of Los Angeles County: South Half. Open File Report 94-14, Plate 1B. ftp://ftp.consrv.ca.gov/pub/dmg/pubs/ofr/OFR_94-14/OFR_94-14_Plate1B.pdf.

⁸ California Geological Survey (CGS). 1994b. Generalized Mineral Land Classification Map of Los Angeles County: North Half. Open File Report 94-14, Plate 1A. ftp://ftp.consrv.ca.gov/pub/dmg/pubs/ofr/OFR_94-14/OFR_94-14_Plate1A.pdf.

5. Environmental Analysis

MINERAL RESOURCES

Mineral Resource Sectors

No mineral resource sectors are designated in the part of the San Gabriel Valley P-C Region in the District. Three sectors are designated in the part of the San Fernando Valley P-C Region in the District:

- Sector A in the Tujunga Valley in and west of the community of Lake View Terrace in the City of Los Angeles.
- Sector B in the Hansen Dam Flood Control Basin in the City of Los Angeles.
- Sector C centered around the Tujunga Wash between Hansen Dam and Interstate 5 in the Community of Sun Valley in the City of Los Angeles.

Much of Sectors A, B, and C are mapped as lost to urbanization.⁹ No schools were identified within the portions of the three sectors not mapped as lost to urbanization on Google Earth in January 2014.

Active Mines

No active mines in the District are shown on the Office of Mine Reclamation's "Mines Online" map.¹⁰

Oil and Gas Fields

Oil fields in the District include the Wilmington Field in the City of Los Angeles communities of Wilmington, Harbor City, and Harbor Gateway, and the City of Lomita; the Dominguez Field in the City of Carson; the Rosecrans and Howard Townsite fields in the City of Gardena; the Hyperion Field in Playa Del Rey; the Playa Del Rey field in Marina Del Rey; the Bandini Field in the cities of Commerce and Vernon and the Community of East Los Angeles; the Los Angeles Downtown, Union Station, Las Cienagas, Los Angeles City, Inglewood, Salt Lake, Beverly Hills, Cheviot Hills, and Sawtelle fields, all in the City of Los Angeles; and the Aliso Canyon and Oat Mountain fields in the Santa Susana Mountains in unincorporated Los Angeles County (see Figure 5.11-1).^{11,12}

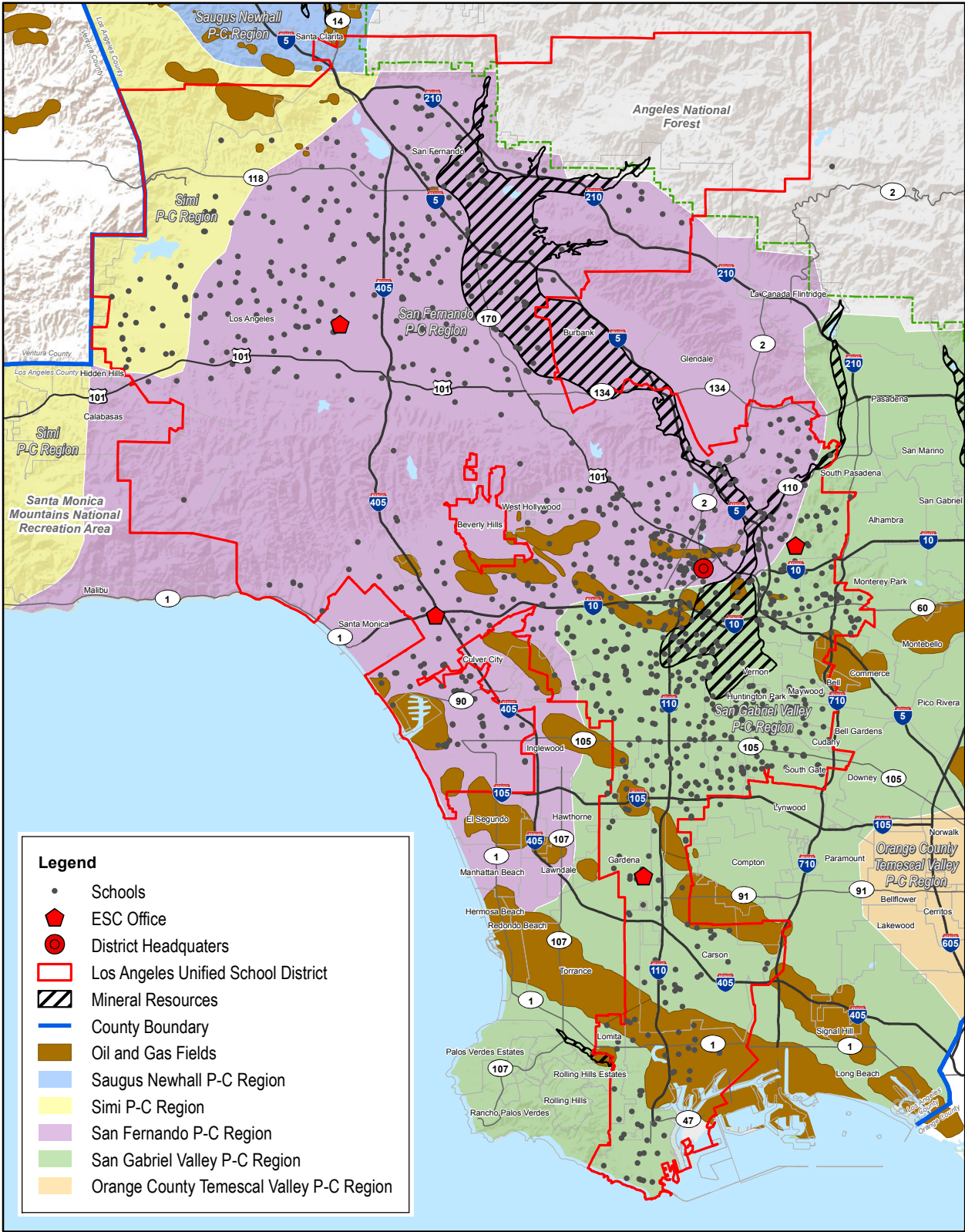
⁹ California Geological Survey (CGS). 1994c. Mineral Land Classification of the Greater Los Angeles Area. Designated Areas Urbanized, San Fernando Valley Production-Consumption Region.: Open File Report 94-14, Plate 4. ftp://ftp.consrv.ca.gov/pub/dmg/pubs/ofr/OFR_94-14/OFR_94-14_Plate4.pdf. (The Mineral Resource Sectors map showing those three Sectors was prepared in 1979.)

¹⁰ Office of Mine Reclamation (OMR). 2014, January 17. Mines Online. <http://maps.conservation.ca.gov/mol/mol-app.html>.

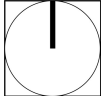
¹¹ Division of Oil, Gas, and Geothermal Resources (DOGGR). 2001, April 16. District 1 Oil Fields. ftp://ftp.consrv.ca.gov/pub/oil/maps/dist1/Dist1_fields.pdf.

¹² Division of Oil, Gas, and Geothermal Resources (DOGGR). 2001, March 22. District 2 Oil Fields. ftp://ftp.consrv.ca.gov/pub/oil/maps/dist2/Dist2_fields.pdf.

5. Environmental Analysis Figure 5.11-1 - Mineral Zones



Source: California Geological Survey, 2013; Division of Oil, Gas, and Geothermal Resources, 2005



5. Environmental Analysis

MINERAL RESOURCES

This page intentionally left blank.

5. Environmental Analysis MINERAL RESOURCES

5.11.2 Thresholds of Significance

According to CEQA Guidelines Appendix G a project would normally have a significant effect on the environment if the project would:

- M-1 Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state.
- M-2 Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan.

5.11.3 Environmental Impacts

The applicable thresholds are identified in brackets after the impact statement.

Impact 5.11-1: SUP implementation would not result in the loss of availability of any known mineral resource or recovery site. [Thresholds M-1 and M-2]

New Construction on New Properties

If schools were expanded and new facilities were constructed in areas designated MRZ-2, they could have an effect on the availability of mineral resources. Two regions in the District are designated MRZ-2: one in central Los Angeles, and the other in the east-central San Fernando Valley. One available aggregate deposit site is identified in the City of Los Angeles General Plan, the Tujunga Alluvial Fan in the Lake View Terrace–Sun Valley area.¹³ There are no schools sites proximal to these areas, therefore no impacts to mineral resources will occur.

New Construction and Modernization on Existing Schools

All of these projects would occur at existing schools. School campuses are not available as mining sites. No impact would occur.

5.11.4 Applicable Regulations and Standard Conditions

- None

5.11.5 Level of Significance Before Mitigation

Impact 5.11-1 would be less than significant.

5.11.6 Mitigation Measures

No mitigation measures are required.

¹³ City of Los Angeles. 2001, September 26. General Plan Conservation Element. <http://cityplanning.lacity.org/cwd/gnlpln/consvelt.pdf>.

5. Environmental Analysis

MINERAL RESOURCES

5.11.7 Level of Significance After Mitigation

Impacts would be less than significant.

5. Environmental Analysis

5.12 NOISE

This section of the program EIR evaluates the potential for implementation of the SUP to impact the noise environment in the District. The section ~~regulatory framework (plans and policies from several jurisdictional agencies and LAUSD Standard Conditions)~~ ~~plans and policies from several jurisdictional agencies and LAUSD standard conditions, guidelines, specifications, practices, policies, and project design features (LAUSD Standards)~~, along with the existing noise environment throughout the SUP area, and possible environmental impacts that may occur ~~as SUP-related site-specific projects are implemented during future phases of the SUP and site-specific projects implemented under the SUP.~~

TERMINOLOGY

Noise is most often defined as unwanted sound. Although sound can be easily measured, the perception of noise and the physical response to sound complicate the analysis of its impact on people. People judge the relative magnitude of sound sensation in subjective terms such as “noisiness” or “loudness.” The following are brief definitions of terminology used in this chapter:

Sound. A disturbance created by a vibrating object, which, when transmitted by pressure waves through a medium such as air, is capable of being detected by a receiving mechanism, such as the human ear or a microphone.

Noise. Sound that is loud, unpleasant, unexpected, or otherwise undesirable.

Decibel (dB). A unitless measure of sound on a logarithmic scale.

A-Weighted Decibel (dBA). An overall frequency-weighted sound level in decibels that approximates the frequency response of the human ear.

Equivalent Continuous Noise Level (L_{eq}). The mean of the noise level, energy-averaged over the measurement period.

Day-Night Level (L_{dn}). The energy-average of the A-weighted sound levels occurring during a 24-hour period, with 10 dB added to sound levels from 10:00 PM to 7:00 AM.

Community Noise Equivalent Level (CNEL). The energy-average of the A-weighted sound levels occurring during a 24-hour period, with 5 dB added to the levels from 7:00 PM to 10:00 PM and 10 dB added from 10:00 PM to 7:00 AM.

Characteristics of Sound

Sound is a pressure wave transmitted through the air. It is described in terms of loudness or amplitude (measured in decibels), frequency or pitch (measured in Hertz [Hz] or cycles per second), and duration (measured in seconds or minutes). The standard unit of measurement of the loudness of sound is the decibel (dB). Changes of 1 to 3 dB are detectable under quiet, controlled conditions and changes of less than 1 dB are usually indiscernible. A 3 dB change in noise levels is considered the minimum change that is detectable

5. Environmental Analysis

NOISE

with human hearing in outside environments. A change of 5 dB is readily discernable to most people in an exterior environment, and a 10 dBA change is perceived as a doubling (or halving) of the sound.

The human ear is not equally sensitive to all frequencies. Sound waves below 16 Hz are not heard at all and are “felt” more as a vibration. Similarly, though people with extremely sensitive hearing can hear sounds as high as 20,000 Hz, most people cannot hear above 15,000 Hz. In all cases, hearing acuity falls off rapidly above about 10,000 Hz and below about 200 Hz.

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

Measurement of Sound

Sound intensity is measured through the A-weighted measure to correct for the relative frequency response of the human ear. That is, an A-weighted noise level deemphasizes low and very high frequencies of sound similar to the human ear’s deemphasis of these frequencies.

Unlike units of measure that are computed with arithmetic functions (such as adding or subtracting numbers), decibels are measured and processed on a logarithmic scale. On a logarithmic scale, an increase of 10 dB is 10 times more intense than 1 dB, a 20 dB increase is 100 times more intense, and 30 dB is 1,000 times more intense. A sound as soft as human breathing is about 10 times greater than 0 dB. The decibel system of measuring sound gives a rough connection between the physical intensity of sound and its perceived loudness to the human ear. Ambient sounds generally range from 30 dBA (very quiet) to 100 dBA (very loud). Table 5.12-1 shows the subjective effect of changes in sound pressure levels.

Table 5.12-1 Change in Apparent Loudness

± 3 dB	Threshold of human perceptibility
± 5 dB	Clearly noticeable change in noise level
± 10 dB	Half or twice as loud
± 20 dB	Much quieter or louder

Source: Bies, David A. and Colin H. Hansen. 2009. *Engineering Noise Control: Theory and Practice*. 4th ed. New York: Spon Press.

Sound levels decrease as the distance from their source increases. Sound dissipates exponentially with distance from the noise source. This phenomenon is known as “spreading loss.” For a single point source, sound levels decrease by approximately 6 dB for each doubling of distance from the source. This drop-off rate is appropriate for noise generated by onsite operations from stationary equipment or activity at a project site. If noise is produced by a line source, such as highway traffic, the sound decreases by 3 dB for each doubling of

5. Environmental Analysis

NOISE

distance in a hard site environment.¹ Line source noise in a relatively flat environment with absorptive vegetation decreases by 4.5 dB for each doubling of distance.

Time variation in noise exposure is typically expressed in terms of a steady-state energy level equal to the energy content of the time varying period (called L_{eq}), or alternately, as a statistical description of the sound level that is exceeded over some fraction of a given observation period. For example, the L_{50} noise level represents the noise level that is exceeded 50 percent of the time. Half the time the noise level exceeds this level and half the time the noise level is less than this level. This level also represents the level that is exceeded 30 minutes in an hour. Similarly, the L_2 , L_8 and L_{25} values represent the noise levels that are exceeded 2, 8, and 25 percent of the time or 1, 5, and 15 minutes per hour. These “L” values are typically used to demonstrate compliance for stationary noise sources with a city’s noise ordinance, as discussed below. Other values typically noted during a noise survey are the L_{min} and L_{max} . These values represent the minimum and maximum root-mean-square noise levels obtained over the measurement period.

Because community receptors are more sensitive to unwanted noise intrusion during the evening and at night, state law and the City and the County of Los Angeles require that, for planning purposes, an artificial dB increment be added to quiet time noise levels in a 24-hour noise descriptor called the Community Noise Equivalent Level (CNEL) or Day-Night Noise Level (L_{dn}). The CNEL descriptor requires that an artificial increment of 5 dBA be added to the actual noise level for the hours from 7:00 PM to 10:00 PM and 10 dBA for the hours from 10:00 PM to 7:00 AM. The L_{dn} descriptor uses the same methodology except that there is no artificial increment added to the hours between 7:00 PM and 10:00 PM. Both descriptors give roughly the same 24-hour level, with the CNEL being only slightly more restrictive (i.e., higher).²

Psychological and Physiological Effects of Noise

Physical damage to human hearing begins at prolonged exposure to noise levels higher than 85 dBA. Exposure to high noise levels affects our entire system, with prolonged noise exposure in excess of 75 dBA increasing body tensions and thereby affecting blood pressure, functions of the heart, and the nervous system. In comparison, extended periods of noise exposure above 90 dBA could result in permanent hearing damage.

Vibration Fundamentals

Vibration is a trembling, quivering, or oscillating motion of the earth. Like noise, vibration is transmitted in waves, but in this case through the earth or solid objects. Unlike noise, vibration is typically of a frequency that is felt rather than heard.

¹ Surface type or ground cover is defined as the “hardness” or “softness” of the surrounding area. “Hard site environment” is areas with acoustically hard ground (e.g., pavement or water). Distance attenuation from a line source (i.e., roadway or railway) with a hard site environment is 3 dB per doubling of distance (dB/DD). “Soft site environment” is areas with acoustically soft ground (e.g., lawn or loose dirt or agricultural uses). Ground cover can affect the sound propagation rate by as much as an additional 1.5 dB/DD. (Note that this rate occurs only when both the noise source and the receiver are close to the ground and the terrain between the two is flat and soft.) As a result of this additional attenuation, the line-source sound levels decrease at a rate of 4.5 dB/DD at soft sites.

² L_{dn} and CNEL values rarely differ by more than 1 dB. As a matter of practice, L_{dn} and CNEL values are considered equivalent and are treated as such in this assessment.

5. Environmental Analysis

NOISE

Vibration can be either natural as in the form of earthquakes, volcanic eruptions, sea waves, landslides, or man-made as from explosions, the action of heavy machinery or heavy vehicles such as trains. Both natural and man-made vibration may be continuous such as from operating machinery, or transient as from an explosion.

As with noise, vibration can be described by both its amplitude and frequency. Amplitude may be characterized in three ways, including displacement, velocity, and acceleration. Particle displacement is a measure of the distance that a vibrated particle travels from its original position and, for the purposes of soil displacement, is typically measured in inches or millimeters. Particle velocity is the rate of speed at which soil particles move in inches per second or millimeters per second. Particle acceleration is the rate of change in velocity with respect to time and is measured in inches per second or millimeters per second. Typically, particle velocity (measured in inches or millimeters per second) and/or acceleration (measured in gravities) are used to describe vibration. Table 5.12-2 shows the human reaction to various levels of vibration.

Table 5.12-2 Human Reaction to Typical Vibration Levels

Vibration Level Peak Particle Velocity (in/sec)	Human Reaction	Effect on Buildings
0.006–0.019	Threshold of perception, possibility of intrusion	Vibrations unlikely to cause damage of any type
0.08	Vibrations readily perceptible	Recommended upper level of vibration to which ruins and ancient monuments should be subjected
0.10	Level at which continuous vibration begins to annoy people	Virtually no risk of “architectural” (i.e., not structural) damage to normal buildings
0.20	Vibrations annoying to people in buildings	Threshold at which there is a risk to “architectural” damage to normal dwelling – houses with plastered walls and ceilings
0.4–0.6	Vibrations considered unpleasant by people subjected to continuous vibrations and unacceptable to some people walking on bridges	Vibrations at a greater level than normally expected from traffic, but would cause “architectural” damage and possibly minor structural damage

Source: California Department of Transportation (Caltrans), Division of Environmental Analysis. 2002, February. *Transportation Related Earthborne Vibration (Caltrans Experiences)*. Technical Advisory, Vibration. TAV-02-01-R9601. Prepared by Rudy Hendricks.

Vibration also varies in frequency and this affects perception. Typical construction vibrations fall in the 10 to 30 Hz range, usually around 15 Hz. Traffic vibrations exhibit a similar range of frequencies; however, due to their suspension systems, buses often generate frequencies around 3 Hz at high vehicle speeds. It is less common, but possible, to measure traffic frequencies above 30 Hz.

The way in which vibration is transmitted through the earth is called propagation. Propagation of groundborne vibrations is complicated and difficult to predict because of the endless variations in the soil through which waves travel. There are three main types of vibration propagation: surface, compression and shear waves. Surface waves, or Raleigh waves, travel along the ground’s surface. These waves carry most of their energy along an expanding circular wave front, similar to ripples produced by throwing a rock into a pool of water. P-waves, or compression waves, are body waves that carry their energy along an expanding spherical wave front. The particle motion in these waves is longitudinal (i.e., in a “push-pull” fashion). P-waves are analogous to airborne sound waves. S-waves, or shear waves, are also body waves that carry energy along an expanding spherical wave front. However, unlike P-waves, the particle motion is transverse or “side-to-side and perpendicular to the direction of propagation.”

5. Environmental Analysis

NOISE

As vibration waves propagate from a source, the energy is spread over an ever-increasing area, such that the energy level striking a given point is reduced with the distance from the energy source. This geometric spreading loss is inversely proportional to the square of the distance. Wave energy is also reduced with distance as a result of material damping in the form of internal friction, soil layering, and void spaces. The amount of attenuation provided by material damping varies with soil type and condition as well as the frequency of the wave.

5.12.1 Environmental Setting

5.12.1.1 REGULATORY FRAMEWORK

National, state, regional, and local laws, regulations, plans, and guidelines are summarized below. The following regulatory framework discussion does not include all plans and policies that relate to noise 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 date when a proposed site-specific school project undergoes review. Therefore, this section provides a general discussion of the most important plans and policies that apply to SUP projects. Although some of these may not directly apply to the SUP or site-specific projects implemented under the SUP, they are included to assist in identifying potential impacts and significance thresholds. Applicable LAUSD Standards Conditions of Approval are also listed. See *Applicable Regulations and Standard Conditions* at the end of this chapter for those that require District compliance.

Federal

United States Code of Regulations Title 14, Part 150

The United States Code of Regulations Title 14 (Aeronautics and Space), Part 150, **Airport Noise Compatibility Planning**, has procedures, standards, and methodology governing the development, submission, and review of airport noise exposure maps and airport noise compatibility programs, including the process for evaluating and approving or disapproving those programs.³ It prescribes methods to determine exposure of individuals to noise from the operations of an airport and also identifies land uses that are normally compatible with various levels of exposure to noise. For schools, an L_{dn} exposure greater than 65 dBA is considered incompatible. Development of schools exposed to annual 65 dBA L_{dn} noise levels due to aircraft noise should be prohibited.

State

California Code of Regulations, Title 5, Section 14040(q)

Under **Title 5**,⁴ 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

³ US Code of Regulations Title 14 (Aeronautics and Space), Part 150 – *Airport Noise Compatibility Planning*. . <http://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&SID=611cdd3c85df7535fc6e7bc54891204b&r=PART&n=14y3.0.1.3.21>.

⁴ Title 5. Education, Division 1. California Department of Education, Chapter 13. School Facilities and Equipment, Subchapter 1. School Housing, Article 2. School Sites, 14010. Standards for School Site Selection. <http://government.westlaw.com/linkedslice/default.asp?SP=CCR-1000>

5. Environmental Analysis

NOISE

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.

California Code of Regulations, Title 24, Part 2

Current law states that every local agency enforcing building regulations, such as cities and counties, must adopt the provisions of the **California Building Code (CBC)** within 180 days of its publication. The publication date of the CBC is established by the California Building Standards Commission. The most recent building standard adopted by the legislature and used throughout the state is the 2013 version, often with local, more restrictive amendments that are based on local geographic, topographic, or climatic conditions.⁵ The State of California's noise insulation standards are codified in the CBC. 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.

California Code of Regulations, Title 21, Subchapter 6

The **Airport Noise Standards** establishes 65 dBA CNEL as the acceptable level of aircraft noise for persons living in the vicinity of airports. Title 21 applies to airports that have been designated "noise problem airports," which include LAX, Long Beach, and Bob Hope Airports. Noise-sensitive land uses in locations where the aircraft exterior noise level exceeds 65 dBA CNEL are generally incompatible, unless (1) an aviation easement for aircraft noise has been acquired by the airport proprietor or (2) the residence is a high-rise apartment or condominium that has an interior CNEL of 45 dBA or less in all habitable rooms despite aircraft noise and has an air circulation or air conditioning system, as appropriate.

Federal Regulatory Agencies

Federal Transit Administration

Vibration. The City of Los Angeles and most jurisdictions do not have specific limits or thresholds for vibration. The United States Department of Transportation Federal Transit Administration (FTA) provides criteria for acceptable levels of ground-borne vibration for various types of special buildings that are sensitive to vibration. The FTA criteria are often used to evaluate vibration impacts during construction.

Vibration-Related Human Annoyance. The human reaction to various levels of vibration is highly subjective and varies from person to person. Table 5.12-3 shows the FTA's vibration criteria to evaluate vibration-related annoyance due to resonances of the structural components of a building. These criteria are based on extensive research that suggests humans are sensitive to vibration velocities in the range of 8 to 80 Hz.

⁵ The 2013 CBC took effect on January 1, 2014.

5. Environmental Analysis NOISE

Table 5.12-3 Groundborne Vibration Criteria: Human Annoyance

Land Use Category	Max Lv (VdB)	Description
Workshop	90	Distinctly felt vibration. Appropriate to workshops and nonsensitive areas
Office	84	Felt vibration. Appropriate to offices and nonsensitive areas.
Residential – Daytime	78	Barely felt vibration. Adequate for computer equipment.
Residential – Nighttime	72	Vibration not felt, but groundborne noise may be audible inside quiet rooms.

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

Note: Max Lv (VdB): Lv is the velocity level in decibels, as measured in 1/3-octave bands of frequency over the frequency ranges of 8 to 80 Hz.

Vibration-Related Architectural Damage. Structures amplify groundborne vibration, and wood-frame buildings such as typical residential structures are more affected by ground vibration than heavier buildings. The level at which groundborne vibration is strong enough to cause architectural damage has not been determined conclusively. The most conservative estimates are reflected in the FTA standards, shown in Table 5.12-4.

Table 5.12-4 Groundborne Vibration Criteria: Architectural Damage

Building Category	PPV (in/sec)	Lv (VdB)
I. Reinforced concrete, steel, or timber (no plaster)	0.5	102
II. Engineered concrete and masonry (no plaster)	0.3	98
III. Non-engineered timber and masonry buildings	0.2	94
IV. Buildings extremely susceptible to vibration damage	0.12	90

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

Note: Lv (VdB): Lv is the velocity level in decibels, as measured in 1/3-octave bands of frequency over the frequency ranges of 8 to 80 Hz.

State Regulatory Agencies

California Office of Noise Control

The land use compatibility chart for community noise prepared by the California Office of Noise Control is shown in Table 5.12-5. This table provides a tool to gauge the compatibility of land uses relative to existing and future noise levels. Table 5.12-5 identifies normally acceptable, conditionally acceptable, and clearly unacceptable noise levels for various land uses. A conditionally acceptable designation implies new construction or development should be undertaken only after detailed analysis of the noise reduction requirements for each land use, and needed noise insulation features are incorporated in the design. By comparison, a normally acceptable designation indicates that standard construction can occur with no special noise reduction requirements.

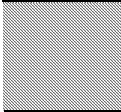
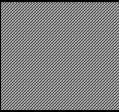
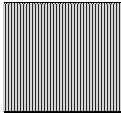

5. Environmental Analysis

NOISE

Table 5.12-5 Community Noise and Land Use Compatibility

Land Uses	CNEL (dBA)					
	55	60	65	70	75	80
Residential-Low Density Single Family, Duplex, Mobile Homes	Normally Acceptable	Normally Acceptable	Normally Acceptable	Normally Unacceptable	Clearly Unacceptable	Clearly Unacceptable
Residential- Multiple Family	Normally Acceptable	Normally Acceptable	Normally Acceptable	Normally Unacceptable	Clearly Unacceptable	Clearly Unacceptable
Transient Lodging: Hotels and Motels	Normally Acceptable	Normally Acceptable	Normally Acceptable	Normally Unacceptable	Clearly Unacceptable	Clearly Unacceptable
Schools, Libraries, Churches, Hospitals, Nursing Homes	Normally Acceptable	Normally Acceptable	Normally Acceptable	Normally Unacceptable	Clearly Unacceptable	Clearly Unacceptable
Auditoriums, Concert Halls, Amphitheaters	Normally Acceptable	Normally Acceptable	Normally Unacceptable	Clearly Unacceptable	Clearly Unacceptable	Clearly Unacceptable
Sports Arena, Outdoor Spectator Sports	Normally Acceptable	Normally Acceptable	Normally Unacceptable	Clearly Unacceptable	Clearly Unacceptable	Clearly Unacceptable
Playground, Neighborhood Parks	Normally Acceptable	Normally Acceptable	Normally Acceptable	Normally Unacceptable	Clearly Unacceptable	Clearly Unacceptable
Golf Courses, Riding Stables, Water Recreation, Cemeteries	Normally Acceptable	Normally Acceptable	Normally Acceptable	Normally Unacceptable	Clearly Unacceptable	Clearly Unacceptable
Office Buildings, Businesses, Commercial and Professional	Normally Acceptable	Normally Acceptable	Normally Acceptable	Normally Unacceptable	Clearly Unacceptable	Clearly Unacceptable
Industrial, Manufacturing, Utilities, Agricultural	Normally Acceptable	Normally Acceptable	Normally Unacceptable	Clearly Unacceptable	Clearly Unacceptable	Clearly Unacceptable

Explanatory Notes

	Normally Acceptable: With no special noise reduction requirements assuming standard construction.		Normally Unacceptable: New construction is discouraged. If new construction does not proceed, a detailed analysis of the noise reduction requirements must be made and needed noise insulation features included in the design.
	Conditionally Acceptable: New construction or development should be undertaken only after a detailed analysis of the noise reduction requirement is made and needed noise insulation features included in the design.		Clearly Unacceptable: New construction or development should generally not be undertaken.

Source: California Office of Noise Control. Guidelines for the Preparation and Content of Noise Elements of the General Plan. February 1976. Adapted from the US EPA Office of Noise Abatement Control, Washington D.C. Community Noise. Prepared by Wyle Laboratories. December 1971.

5. Environmental Analysis NOISE

Local Regulatory Agencies

County of Los Angeles

Exterior Noise Standards

The County of Los Angeles regulates noise through the county municipal code, Title 12, Chapter 12.08 (Noise Control). The county applies the noise ordinance standards to nontransportation sources such as air conditioners, fans, blowers, pumps, turbines, saws, engines, and other machinery: music; and construction activity (see Table 5.12-6). These standards do not gauge the compatibility of development, but restrict the amount and duration of noise generated, as measured at the property line of the noise receptor. The noise standards in Table 5.12-6, unless otherwise indicated, apply to all property within a designated noise zone.

Table 5.12-6 County of Los Angeles Exterior Noise Standards

Noise Zone	Time Period	Maximum Permissible Noise Level (dBA)				
		Standard 1 (L ₅₀)	Standard 2 (L ₂₅)	Standard 3 (L ₅)	Standard 4 (L ₂)	Standard 5 (L _{max})
Noise-Sensitive Area	Anytime	45	50	55	60	65
Residential Properties	10:00 PM to 7:00 AM	45	50	55	60	65
	7:00 AM to 10:00 PM	50	55	60	65	70
Commercial Properties	10:00 PM to 7:00 AM	55	60	65	70	75
	7:00 AM to 10:00 PM	60	65	70	75	80
Industrial Properties	Anytime	70	75	80	85	90

Source: County of Los Angeles Municipal Code, Section 12.08.390. <https://library.municode.com/index.aspx?clientId=16274>.

Notes: Maximum Permissible Noise Level (dBA):

- According to Section 12.08.390, if the ambient noise levels exceed the exterior noise standards then the ambient noise level becomes the noise standard. If the source of noise emits a pure tone or impulsive noise, the exterior noise levels limits shall be reduced by five decibels.
- If the measurement location is on a boundary property between two different zones, the noise limit shall be the arithmetic mean of the maximum permissible noise level limits of the subject zones; except when an intruding noise source originates on an industrial property and is impacting another noise zone, the applicable exterior noise level shall be the daytime exterior noise level for the subject receptor property.

According to the County Municipal Code, Title 12, Chapter 12.08:

- **Standard No. 1** shall be the exterior noise level which may not be exceeded for a cumulative period of more than 30 minutes in any hour. Standard No. 1 shall be the applicable L₅₀ noise level shown above; or, if the ambient L₅₀ exceeds the foregoing level, then the ambient L₅₀ becomes the exterior noise level for Standard No. 1.
- **Standard No. 2** shall be the exterior noise level which may not be exceeded for a cumulative period of more than 15 minutes in any hour. Standard No. 2 shall be the applicable L₅₀ noise level shown above plus 5 dB; or, if the ambient L₂₅ exceeds the foregoing level, then the ambient L₂₅ becomes the exterior noise level for Standard No. 2.
- **Standard No. 3** shall be the exterior noise level which may not be exceeded for a cumulative period of more than five minutes in any hour. Standard No. 3 shall be the applicable L₅₀ noise level shown above

5. Environmental Analysis

NOISE

plus 20 dB; or, if the ambient L_8 exceeds the foregoing level, then the ambient L_8 becomes exterior noise level for Standard No. 3.

- **Standard No. 4** shall be the exterior noise level which may not be exceeded for a cumulative period of more than one minute in any hour. Standard No. 4 shall be the applicable L_{50} noise level shown above plus 15 dB; or, if the ambient L_2 exceeds the foregoing level, then the ambient L_2 becomes the exterior noise level for Standard No. 4.
- **Standard No. 5** shall be the exterior noise level which may not be exceeded for any period of time. Standard No. 5 shall be the applicable L_{50} noise level shown above plus 20 dB; or, if the ambient L_0 exceeds the foregoing level then the ambient L_{max} becomes the exterior noise level for Standard No. 5.

Construction Noise

County construction noise is restricted by “Operating or causing the operation of any tools or equipment used in construction, drilling, repair, alteration or demolition work between weekday hours of 7:00 PM and 7:00 AM, or at any time on Sundays or holidays, such that the sound therefrom creates a noise disturbance across a residential or commercial real-property line, except for emergency work of public service utilities or by variance issued by the health officer is prohibited.”⁶ Noise cannot create a noise disturbance across a residential or commercial real-property line, except for emergency work on public service utilities or by county-permitted variance. The county also sets maximum noise levels from mobile equipment (unscheduled, intermittent, short-term operations for less than 30 days) as shown in Table 5.12-7.

Table 5.12-7 County of Los Angeles Mobile Construction Equipment Noise Limits

	Single-Family Residential	Multifamily Residential	Semi-residential/ Commercial
Daily, except Sundays and legal holidays, 7:00 AM to 8:00 PM	75 dBA	80 dBA	85 dBA
Daily, 8:00 PM to 7:00 AM and all day Sunday and legal holidays	60 dBA	64 dBA	70 dBA

Source: County of Los Angeles Municipal Code, Section 12.08.440. <https://library.municode.com/index.aspx?clientId=16274>.

Maximum noise levels from stationary equipment (scheduled daily and long-term operations of 10 days or more) are summarized in Table 5.12-8.

Table 5.12-8 County of Los Angeles Stationary Construction Equipment Noise Limits

	Single-Family Residential	Multifamily Residential	Semi-residential/ Commercial
Daily, except Sundays and legal holidays, 7:00 AM to 8:00 PM	60 dBA	65 dBA	70 dBA
Daily, 8:00 PM to 7:00 AM and all day Sunday and legal holidays	50 dBA	55 dBA	60 dBA

Source: County of Los Angeles Municipal Code, Section 12.08.440. <https://library.municode.com/index.aspx?clientId=16274>.

⁶ County of Los Angeles Municipal Code, Section 12.08.440. <https://library.municode.com/index.aspx?clientId=16274>.

5. Environmental Analysis NOISE

Los Angeles County Airport Land Use Plan

In Los Angeles County the Regional Planning Commission has the responsibility for acting as the Airport Land Use Commission (ALUC) and coordinating the airport planning of public agencies within the county. The currently adopted plan is the Los Angeles County Airport Land Use Plan.⁷ Noise-sensitive land uses in locations where the aircraft exterior noise level does not exceed 65 dBA CNEL are compatible as long as interior habitable rooms remain below 45 dBA CNEL.

The California Public Resources Code, Section 21096, requires that when preparing an environmental impact report for any project within an airport influence area, as defined by an Airport Land Use Plan (ALUP), the lead agency shall utilize the California Airport Land Use Planning Handbook as a technical resource with respect to airport noise and safety compatibility. The basis for airport compatibility zone delineation is the CNEL contours created with the Federal Aviation Administration (FAA) Integrated Noise Model for private and public airports. The ALUP includes a Land Use Compatibility chart to guide the compatibility of a proposed use in relation to the level of exposure to aircraft noise, as shown in Table 5.12-9.

Table 5.12-9 ALUP Land Use Compatibility

Land Uses	Community Noise Exposure CNEL (dBA)					
	55	60	65	70	75	80
Residential						
Education Facilities						
Commercial						
Industrial						
Agriculture						
Recreation						
Explanatory Notes						
	Satisfactory		Avoid Land Use Unless Related to Airport Services			
	Caution. Review Noise Insulation Needs					

Source: Los Angeles County Department of Regional Planning 2004.

The ALUP is a land use compatibility plan that is intended to protect the public from adverse effects of aircraft noise. In most instances, the airport influence area is designated by the ALUC as its planning area boundary for the airport, and the two terms can be considered synonymous. Aircraft noise contours used for planning purposes by the County of Los Angeles and Airport Land Use Commission are found in the ALUP. The ALUP identifies noise impact zones based on the airport noise contours. ALUP policies and programs relevant to noise are listed below:

⁷ Los Angeles County Airport Land Use Plan, Los Angeles Department of Regional Planning. 2004. http://planning.lacounty.gov/assets/upl/data/pd_alup.pdf.

5. Environmental Analysis

NOISE

- **G-1** Require new uses to adhere to the Land Use Compatibility table.
- **G-2** Encourage the recycling of incompatible land uses to uses which are compatible with the airport, pursuant to the Land Use Compatibility Chart.
- **G-3** Consider requiring dedication of an aviation easement to the jurisdiction owning the airport as a condition of approval on any project within the designated planning boundaries.
- **G-4** Airport proprietors should achieve airport/community land use compatibility by adhering to the guidelines of the California Noise Standards.
- **N-1** Use the CNEL method for measuring noise impacts near airports in determining suitability for various types of land uses
- **N-2** Require sound insulation to insure a maximum interior 45 dBA CNEL in new residential, educational, and health-related uses in areas subject to exterior noise levels of 65 dBA CNEL or greater.
- **N-3** Utilize the table listing Land Use Compatibility for Airport Noise Environments in evaluating projects within planning boundaries.
- **N-4** Encourage local agencies to adopt procedures to ensure that prospective property owners in aircraft noise exposure areas above a current or anticipated 60 dBA CNEL are informed of these noise levels and of any land use restriction associated with high noise exposure.

Vibration Standards

The County of Los Angeles Municipal Code, Section 12.08.560, prohibits the operation of any device that creates vibration that is above 0.01 in/sec at or beyond the property boundary of the source on private property or at 150 feet from the source on a public space or right-of-way. This criterion is often utilized to evaluate vibration-annoyance impacts from industrial uses to nearby sensitive receptors.

City of Los Angeles

General Plan Noise Element

The City of Los Angeles includes noise standards and guidelines in its general plan noise element and the municipal code, as discussed below. The city's noise element is the guiding document for the city's noise policy. The City classifies land uses for noise compatibility as acceptable, conditionally acceptable, normally unacceptable, and unacceptable depending on the noise level and land use. Noise levels of less than 60 dBA CNEL are classified as acceptable for land uses that are sensitive to noise. Noise-sensitive land uses include residential, schools, libraries, churches, nursing homes, hospitals, and open space/recreation areas. Noise levels from 60 to 70 dBA CNEL are "conditionally acceptable" for noise-sensitive uses, meaning a detailed analysis of noise mitigation is

5. Environmental Analysis NOISE

required and noise insulation features should be included in the project design. Noise levels above 70 dBA CNEL are considered by the city to be “normally unacceptable” or “unacceptable” for noise sensitive land uses.⁸

Municipal Code

The city’s noise ordinance, codified in its municipal code, is designed to protect people from objectionable nontransportation noise sources such as music, machinery, pumps, and air conditioners.⁹ These standards do not gauge the compatibility of developments in the noise environment, but provide restrictions on the amount and duration of noise generated at a property, as measured at the property line of the noise receptor. According to the city’s noise ordinance, stationary noise sources such as radios, television sets, and similar devices (Section 112.01), and air conditioning, refrigeration, heating, pumping, and filtering equipment (Section 112.02) are prohibited from causing the ambient noise level to increase by more than 5 dB. Where actual ambient levels are lower than shown in Table 5.12-10, the presumed ambient noise levels in the table are used as the baseline.¹⁰

Table 5.12-10 City of Los Angeles Ambient Noise Criteria

Zoning Categories	Time Period	Exterior Noise Limits (dBA Leq)
Residential: A1, A2, RA, RE, RS, RD, RW1, RW2, R1, R2, R3, R4, and R5	10:00 PM to 7:00 AM	40
	7:00 AM to 10:00 PM	50
Commercial: P, PB, CR, C1, C1.5, C2, C4, C5, and CM	10:00 PM to 7:00 AM	55
	7:00 AM to 10:00 PM	60
Industrial: M1, MR1, and MR2	10:00 PM to 7:00 AM	55
	7:00 AM to 10:00 PM	60
Industrial: M2 and M3	10:00 PM to 7:00 AM	65
	7:00 AM to 10:00 PM	65

Notes:

Residential: A1 and A2: Agriculture; RA and RS: Suburban; RE Residential Estate; RD: Restricted Density Multiple Dwelling; RW1 and RW2: Residential Waterways; R1: One-family; R2: Two-family; R3, R4, and R5: Multiple Dwelling. **Commercial:** P: Automobile Parking; PB Parking Building; CR, C1, and C1.5: Limited Commercial; C2, C4, and C5: Commercial Zone; CM: Commercial Manufacturing. **Light Industrial:** M1: Limited Industrial; MR1: Restricted Industrial; MR2: Restricted Light Industrial, M2: Light Industrial; M3: Heavy Industrial.

Trash collecting within 200 feet of a residential building is prohibited between the hours of 9:00 PM and 6:00 AM.¹¹ In addition, loading/unloading of commercial vehicles is prohibited between the hours of 10:00 PM and 7:00 AM within 200 feet of a residential building.¹²

⁸ City of Los Angeles General Plan Noise Element, City of Los Angeles Department of City Planning, 1999.

⁹ City of Los Angeles Municipal Code, Chapter XI, Noise Regulation http://www.amlegal.com/nxt/gateway.dll?f=templates&fn=default.htm&vid=amlegal:lmc_ca.

¹⁰ City of Los Angeles Municipal Code, Chapter XI, Noise Regulation, Article 1, Section 111.03, Minimum Ambient Noise Levels. http://www.amlegal.com/nxt/gateway.dll?f=templates&fn=default.htm&vid=amlegal:lmc_ca.

¹¹ City of Los Angeles Municipal Code, Chapter XI, Noise Regulation, Article 1, Section 113.01, Rubbish and Garbage Collection and Disposal

¹² City of Los Angeles Municipal Code, Chapter XI, Noise Regulation, Article 1, Section 114.03, Vehicles-Loading and Unloading.

5. Environmental Analysis

NOISE

Construction Noise Standards

Section 41.40 and Section 112.05 of the City of Los Angeles Municipal Code govern noise limits and the hours of construction activities in the city.

Section 41.40 of the municipal code specifies hours allowed for construction activities for the purposes of noise control.¹³ Construction activities are constrained to the daytime hours from 7:00 AM to 9:00 PM Monday through Friday, 8:00 AM to 6:00 PM on Saturdays and national holidays, and prohibited on Sundays.

Chapter XI, Noise Control, Section 112.05, of the Los Angeles Municipal Code also specifies the maximum noise level for construction equipment.¹⁴ In accordance with this section and Section 41.40, construction equipment, including augers, loaders, power shovels, cranes, derricks, motor graders, paving machines, off-highway trucks, ditchers, trenchers, compactors, scrapers, wagons, pavement breakers, compressors, and pneumatic or other powered equipment items shall not produce a maximum noise level exceeding 75 dBA at a distance of 50 feet between the hours of 7:00 AM and 9:00 PM. The city allows construction noise exceeding these noise limits if compliance is technically infeasible. However, the burden of proving that compliance is technically infeasible includes showing that noise limitations cannot be complied with despite the use of mufflers, shields, sound barriers, and/or other noise reduction devices or techniques during the operation of the equipment.

City of Los Angeles CEQA Thresholds Guide

The Los Angeles CEQA thresholds guide provides criteria to determine noise impacts.

A project would have a significant **construction-related noise impact** if:

- Construction activities lasting more than one day would exceed existing ambient exterior noise levels by 10 dBA or more at a noise sensitive use;
- Construction activities lasting more than 10 days in a three month period would exceed existing ambient exterior noise levels by 5 dBA or more at a noise sensitive use; or
- Construction activities would exceed the ambient noise level by 5 dBA at a noise sensitive use between the hours of 9:00 PM and 7:00 AM Monday through Friday, before 8:00 AM or after 6:00 PM on Saturday, or at any time on Sunday.

A project would have a long-term **operational noise impact** if noise levels during operation “causes the ambient noise levels at the property line of affected uses to increase by three dBA CNEL to or within the ‘normally unacceptable’ or ‘clearly unacceptable’ category, or any five dBA or greater increase.”¹⁵

¹³ City of Los Angeles, City of Los Angeles Municipal Code, Chapter IV, Public Welfare, Article 1, Disorderly Conduct, Section 41.40, Noise Due to Construction, Excavation Work – When Prohibited. Available: <http://www.amlegal.com/los_angeles_ca/>.

¹⁴ City of Los Angeles Municipal Code, Chapter XI, Noise Regulation, Article 2, Section 112.05, Maximum Noise Level of Powered Equipment or Powered Hand Tools.

¹⁵ City of Los Angeles CEQA Thresholds Guide, 2006. <http://environmentla.org/programs/thresholdsguide.htm>.

5. Environmental Analysis NOISE

Other Jurisdictional Noise Standards

Other Cities within the LAUSD

The District has considered local plans and policies for the communities surrounding its facilities. The boundaries of the LAUSD spread over 720 square miles and include the City of Los Angeles as well as all or parts of 31 other municipalities plus several unincorporated areas of Los Angeles County. The noise standards of the municipality where a project is located will be used in future CEQA analysis for each site-specific project.

American National Standards Institute

The American National Standards Institute (ANSI), along with efforts of the U.S. Access Board and the Acoustical Society of America (ASA), created the ANSI S12.60-2002 standard, Acoustical Performance Criteria, Design Requirements and Guidelines for Schools. Through specific design requirements and acoustical performance criteria, the standard creates a classroom environment that optimizes speech understanding. Compliance with the ANSI standard is voluntary, but many school districts and state and local agencies have adopted the standard as a part of their construction and renovation requirements for schools.¹⁶

American Speech-Language-Hearing Association

In 2004, the American Speech-Language-Hearing Association's (ASHA's) Working Group on Classroom Acoustics recommended that an appropriate acoustical environment be established in all classrooms and learning spaces. ASHA endorses the ANSI standard for classroom acoustics and recommends the following acoustical criteria:¹⁷

1. Unoccupied classroom levels must not exceed 35 dBA.
2. The signal-to-noise ratio (the difference between the teacher's voice and the background noise) should be at least +15 dB at the child's ears.
3. Unoccupied classroom reverberation must not surpass 0.6 seconds in smaller classrooms or 0.7 seconds in larger rooms.

LAUSD

Standard Conditions of Approval

LAUSD Standards

This table lists the noise-related standard conditions, project design features (PDF) that are will be included as part of each SUP-related project, as appropriate.

¹⁶ American National Standards Institute (ANSI). <http://www.asha.org/public/hearing/American-National-Standard-on-Classroom-Acoustics/#sthash.Kz9suC8L.dpuf>.

¹⁷ American Speech-Language-Hearing Association. American National Standard on Classroom Acoustics. <http://www.asha.org/public/hearing/American-National-Standard-on-Classroom-Acoustics/>.

5. Environmental Analysis

NOISE

PDF Reference #	Topic	Trigger for Compliance	Implementation Phase	Project Design Feature Standard Conditions
Project Design Features				
<u>SC-AQ-12</u>	Construction emissions Noise	If project requires large construction equipment	During project construction	LAUSD's construction contractor shall ensure that construction equipment is properly tuned and maintained in accordance with manufacturer's specifications, <u>to ensure excessive noise is not generated by unmaintained equipment.</u>
<u>SC-N-1</u>	Exterior campus noise Campus noise	If projected exterior noise levels on a new site is are or would be greater than 70 dBA L₁₀ or 67 dBA L_{eq}.	During project design	The LAUSD shall include features such as sound walls, building configuration, and other design features in order to attenuate exterior noise levels on a school campus to less than 70 dBA L ₁₀ or 67 dBA L _{eq} .
<u>SC-N-2</u>	Interior classroom noise Classroom noise	If projected interior classroom noise levels is would be greater than 55 dBA L₁₀ or 45 dBA L_{eq}.	During project design	<p>The LAUSD shall analyze the acoustical environment of the site (such as traffic) and the characteristics of planned building components (such as heating, ventilation, and air conditioning [HVAC]), and design to achieve interior classroom noise levels of less than 55 dBA L₁₀ or 45 dBA L_{eq} with maximum (unoccupied) reverberation times of 0.6 seconds. Noise reduction methods shall include, <u>but are not limited to, features such as</u> sound walls, building and/or classroom insulation, HVAC modifications, double-paned windows, and other design features in order to achieve the noise standards.</p> <ul style="list-style-type: none"> • <u>The District should acknowledge the ANSI (American National Standards Institute) S12 standard as a District goal that may presently not be achievable in all cases.</u> • <u>Where economically feasible, new school design should achieve classroom acoustical quality consistent with the ANSI standard and in no event exceed the current CHPS (California High Performance Schools) standard of 45 dBA.</u> • <u>Where economically feasible, new HVAC (Heating, Ventilating, and Air Conditioning) installations should be designed to achieve the lowest possible noise level consistent with the ANSI standard. In no event should these installations exceed the current CHPS standard of 45 dBA.</u> • <u>To promote the development of lower noise emitting HVAC units, the District's purchase of new units should give preference to manufacturers producing the lowest noise level at the lowest cost.</u> • <u>Existing HVAC units operating in excess of 50 dBA should be modified.</u>
<u>SC-N-3</u>	Traffic noise	Where Per project-related traffic noise levels exceeds local noise standards, policies, or ordinances.	Prior to project approval	LAUSD shall require an acoustical analysis to identify feasible measures to reduce traffic noise increases to 3 dBA CNEL or less at the noise-sensitive land use. LAUSD shall implement recommended measures to reduce noise.

5. Environmental Analysis NOISE

PDF Reference #	Topic	Trigger for Compliance	Implementation Phase	Project Design Feature Standard Conditions
Project Design Features				
SC-N-4	<u>Operational Noise-sensitive land uses</u>	Where Operational project-related school noise levels will exceed local noise standards, policies, or ordinances <u>at noise-sensitive land uses.</u>	During project design and construction	LAUSD shall incorporate <u>long-term permanent noise attenuation measures</u> buffer zones, sound barriers (such as buildings, masonry walls, enclosed bleacher foot wells, or other special design features) between playgrounds, stadiums, and other noise-generating facilities and adjacent residential or noise-sensitive land uses, to reduce noise levels to meet jurisdictional standards or an increase of 3 dB or less over ambient. <u>Operational noise attenuation measures include, but are not limited to:</u> <ul style="list-style-type: none"> • <u>buffer zones</u> • <u>berms</u> • <u>sound barriers:</u> <ul style="list-style-type: none"> • <u>buildings</u> • <u>masonry walls</u> • <u>enclosed bleacher foot wells</u> • <u>other site-specific project design features, buffer zones, berms, and sound barriers such as buildings, masonry walls, enclosed bleacher foot wells, or other special design features.</u>
SC-N-5	<u>Construction Noise and Vibration (Annoyance) Noise-sensitive land uses</u>	If Construction projects will occur on an existing school campus.	Prior to construction	LAUSD Facilities Division or its construction contractor shall consult and coordinate with the school principal or site administrator, and other nearby noise sensitive land uses prior to construction to schedule high noise or vibration producing activities to minimize disruption. Coordination between the school, nearby land uses and the construction contractor shall continue on an as-needed basis throughout the construction phase of the project to reduce school and other noise sensitive land use disruptions.
SC-N-6	<u>Vibration (Structural Damage)</u>	If project requires R rock blasting or demolition activities.	During construction	The LAUSD shall require the construction contractor to minimize blasting for all construction or and demolition activities, where feasible. If demolition is necessary adjacent to residential uses or fragile structures, the LAUSD shall require the construction contractor to avoid using impact tools. Alternatives that shall be considered include mechanical methods using hydraulic crushers or deconstruction techniques.
SC-N-7	<u>Vibration (Structural Damage)</u>	If project requires P pile driving or heavy vibration activities.	During construction	For projects where pile driving activities are required within 150 feet of a structure, a detailed vibration assessment shall be provided by an acoustical engineer to analyze potential impacts related to vibration to nearby structures and to determine feasible mitigation measures to eliminate potential risk of architectural damage.
SC-N-8	<u>Vibration (Structural Damage)</u>	Where V vibration intensive activities are planned within 25 feet of a historic building or structure	Prior to and during demolition and construction	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. <ul style="list-style-type: none"> • Prior to construction activities, the construction contractor shall inspect and report on the current foundation and structural

5. Environmental Analysis

NOISE

PDF Reference #	Topic	Trigger for Compliance	Implementation Phase	Project Design Feature Standard Conditions
Project Design Features				
				<p>condition of the historic building.</p> <ul style="list-style-type: none"> The construction contractor shall implement alternative methods identified in the preconstruction meeting during demolition, excavation, and construction for work done within 25 feet of the historic building. The construction contractor shall avoid use of vibratory rollers and packers adjacent to a historic building. During demolition the construction contractor shall not phase any ground-impacting operations near a historic building to occur at the same time as any ground impacting operation associated with demolition and construction of a new building. During demolition and construction, if any vibration levels cause cosmetic or structural damage to a historic building the District shall issue "stop-work" orders to the construction contractor immediately to prevent further damage. Work shall not restart until the building is stabilized and/or preventive measures to relieve further damage to the building are implemented.
<u>SC-N-119</u>	Construction Noise	If project requires exterior construction and/or heavy equipment	During construction	The construction contractor shall comply with applicable noise ordinances of the affected city or county jurisdiction, if feasible.
<u>SC-N-129</u>	Construction Noise	Exterior construction and the use of large, heavy or noisy construction equipment. If project requires exterior construction	During construction	<p>LAUSD shall prepare a noise assessment.</p> <p>If site-specific review of a school construction project identifies potentially significant adverse construction noise impacts, then LAUSD shall implement all feasible measures to reduce below applicable noise ordinances. Exterior construction noise levels exceed local noise standards, policies, or ordinances at noise-sensitive receptors. LAUSD shall mandate that construction bid contracts include the measures identified in the noise assessment. Specific noise reduction measures include, but are not limited to, the following:</p> <p>If project construction noise levels are expected to exceed noise thresholds of significance, the LAUSD shall require the construction contractor to implement all feasible noise attenuation measures that may be identified as part of the environmental review of each individual project. Feasible noise attenuation measures include, but are not limited to:</p> <ul style="list-style-type: none"> construction of a masonry wall or installation of sound blankets along the property line adjacent to residential uses. <p>Source Controls</p> <ul style="list-style-type: none"> Time Constraints – prohibiting work during sensitive nighttime hours Scheduling – performing noisy work during less sensitive time periods (on operating campus: delay the loudest noise generation until class instruction at the nearest classrooms has ended; residential: only between 7:00 AM and 7:00 PM) Equipment Restrictions – restricting the type of equipment used Noise Restrictions – specifying stringent noise limits Substitute Methods – using quieter methods and/or equipment Exhaust Mufflers – ensuring equipment have quality mufflers installed Lubrication & Maintenance – well maintained equipment is

5. Environmental Analysis NOISE

PDF Reference #	Topic	Trigger for Compliance	Implementation Phase	Project Design Feature Standard Conditions
Project Design Features				
				<p><u>quieter</u></p> <ul style="list-style-type: none"> • <u>Reduced Power Operation – use only necessary size and power</u> • <u>Limit Equipment On-Site – only have necessary equipment on-site</u> • <u>Noise Compliance Monitoring – technician on site to ensure compliance</u> • <u>Quieter Backup Alarms – manually-adjustable or ambient sensitive types</u> <p><u>Path Controls</u></p> <ul style="list-style-type: none"> • <u>Noise Barriers – semi-permanent or portable wooden or concrete barriers</u> • <u>Noise Curtains – flexible intervening curtain systems hung from supports</u> • <u>Enclosures – encasing localized and stationary noise sources</u> • <u>Increased Distance – perform noisy activities farther away from receptors, including operation of portable equipment, storage and maintenance of equipment</u> <p><u>Receptor Controls</u></p> <ul style="list-style-type: none"> • <u>Window Treatments – reinforcing the building's noise reduction ability</u> • <u>Community Participation – open dialog to involve affected residents</u> • <u>Noise Complaint Process – ability to log and respond to noise complaints. Advance notice of the start of construction shall be delivered to all noise sensitive receptors adjacent to the project area. The notice shall state specifically where and when construction activities will occur, and provide contact information for filing noise complaints with the contractor and the District. In the event of noise complaints the LAUSD shall monitor noise from the construction activity to ensure that construction noise does not exceed limits specified in the noise ordinance.</u> • <u>Temporary Relocation – in extreme otherwise unmitigatable cases. Temporarily move residents or students to facilities away from the construction activity.</u>
SC-AQ-42	Construction emissions <u>Noise</u>	<u>If project requires large construction equipment</u>	During project construction	LAUSD's construction contractor shall ensure that construction equipment is properly tuned and maintained in accordance with manufacturer's specifications, <u>to ensure excessive noise is not generated by unmaintained equipment.</u>

5.12.1.2 EXISTING CONDITIONS

Within Los Angeles County, the major noise sources are generally transportation-related (i.e., vehicles, railroads, and aircraft.). In addition, stationary noise sources (air conditioning units, loading docks, mechanical equipment, rail yards, machinery, etc.) from commercial and industrial activity also contribute to the county's

5. Environmental Analysis

NOISE

existing noise environment. Table 5.12-11 shows typical noise levels from various noise sources in Los Angeles County.

5. Environmental Analysis
NOISE

Table 5.12-11 Typical Noise Levels

Common Outdoor Activities	Noise Level (dBA)	Common Indoor Activities
	110	Rock Band
Jet Flyover at 1,000 feet	105	
Gas Lawn Mower at three feet	95	
Diesel Truck at 50 feet, at 50 mph	85	Food Blender at 3 feet
	80	Garbage Disposal at 3 feet
Noisy Urban Area, Daytime	75	
	70	Vacuum Cleaner at 10 feet
Commercial Area	65	Normal speech at 3 feet
Heavy Traffic at 300 feet	60	
	55	Large Business Office
Quiet Urban Daytime	50	
	45	Dishwasher Next Room
Quiet Urban Nighttime	40	Theater, Large Conference Room (background)
Quiet Suburban Nighttime	35	
	30	Library
Quiet Rural Nighttime	25	Bedroom at Night, Concert Hall (background)
	15	Broadcast/Recording Studio
Lowest Threshold of Human Hearing	0	Lowest Threshold of Human Hearing

Source: California Department of Transportation (Caltrans). 2009, November. *Technical Noise Supplement ("TeNS")*. Prepared by ICF International.

Northwest Local District

Major freeways in the Northwest Local District (LD) are Interstates 5 and 405, and State Routes 101 and 118 (see Chapter 3, Figure 3-2, for LD boundaries). Major roads such as Roscoe Boulevard, Sharman Way, and others generate high levels of traffic noise.

Freight and passenger rail lines are in the Northwest LD. Metrolink and Amtrak passenger service is provided on lines that link Los Angeles and Ventura County, and travels through the San Fernando Valley.

Van Nuys Airport, a general aviation airport, is in the Northwest LD.

Stationary noise is generated by all types of land uses. Residential uses generate noise from landscaping, maintenance activities, and air conditioning systems. Commercial and industrial uses generate noise from heating, ventilation, air conditioning (HVAC) systems, loading docks, machinery, parking lots, and other operational sources. Noise generated by residential and commercial uses are generally short and intermittent. Industrial uses typically generate noise on a continual basis due to the nature of their activities.

Northeast Local District

Major freeways in the Northwest Local District (LD) are Interstates 5 and 210, and State Routes 101, 118, 134, and 170. Major surface streets in the Northeast LD include Ventura Boulevard, Victory Boulevard, Sherman Way, Van Nuys Boulevard, and San Fernando Road.

5. Environmental Analysis

NOISE

Freight and passenger railways connecting central Los Angeles with Ventura County and with the Antelope Valley pass through the Northeast LD.

Bob Hope Airport, a commercial airport, and Whiteman Airport, a general aviation airport, are both in the Northeast LD.

Stationary noise generation by urban land uses is similar to that in the Northwest LD.

West Local District

Freeways in the West LD include Interstates 10, 105, and 405 and state routes 90 and 101.

Union Pacific freight railroad tracks pass through the southeast part of the West LD. The Expo Light Rail Line connects central Los Angeles with Culver City; and is scheduled to begin operation to Santa Monica in early 2016.

The major airport that provides international and domestic service is Los Angeles International (LAX). In addition, the general aviation airports such as Hawthorne and Santa Monica are just outside the West LD.

Stationary noise generation by urban land uses is similar to that in other Local Districts. In particular, several industrial areas are in the vicinity of LAX.

Central Local District

Major freeways in the Central LD are interstates 5, 10, and 110 and state routes 2, 101, and 134.

Freight railroads pass along the east edge of the central part of the Central LD, and along the east edge of the LD east of Interstate 5.

There are no airports in or next to the Central LD.

Stationary noise generation by urban land uses is similar to that in other Local Districts. The major concentrations of commercial and civic land uses in downtown Los Angeles are in the Central LD.

East Local District

Major freeways in the East LD are Interstates 5, 10, 110, and 710, and State Routes 101, 110, and 60.¹⁸ Major roads such as Alameda Street, Cesar Chavez Avenue, and others generate high levels of traffic noise.

Several freight and passenger rail lines are in the East LD. Union Station, the largest passenger rail station in the Los Angeles region, is in the Central City North community of Los Angeles. There are several major freight railroad yards in the East LD including the Union Pacific Los Angeles Transportation Center near the Community of Lincoln Heights in the City of Los Angeles; the Union Pacific Commerce Railyard in the City of Commerce; and the BNSF Hobart Railyard in the City of Commerce.

¹⁸ Interstate 110 extends from State Route 101 south to the Community of San Pedro in the City of Los Angeles; State Route 110 extends north from State Route 101 to the City of Pasadena.

5. Environmental Analysis

NOISE

As previously discussed, stationary sources of noises occur with all types of land uses. There are major concentrations of industrial and transportation land uses in the East LD.

South Educational Service Center

Major freeways in the South LD are Interstates 110, 405, and 710 and State Routes 47 and 91. Major roads such as Pacific Coast Highway, Rosecrans Avenue, Sepulveda Boulevard, Alameda Street, and others generate high levels of traffic noise (see Chapter 3, Figure 3-2, for LD boundaries).

Several freight and passenger rail lines are in the South LD. Major freight train activities are associated with industrial and warehouse uses and the Port of Los Angeles. Freight lines operated by Union Pacific and BNSF are along the Alameda Corridor that crosses the South LD. The Port of Los Angeles also contains many stationary and mobile noise sources.

The major airport that provides domestic commercial service is Long Beach Airport east of the LD. In addition, several general aviation airports such as Torrance and Hawthorne are west of the South LD.

As previously discussed, stationary sources of noises may occur with all types of land uses. In particular, several industrial areas are in the vicinity of the Port of Los Angeles, along the 110 freeway, and in the City of Vernon. The Port of Long Beach and related industrial uses are next to the southeast LD boundary.

Sensitive Receptors

Certain land uses are particularly sensitive to noise and vibration. These uses include schools, residences, hospital facilities, religious facilities, and open space/recreation areas where quiet environments are necessary for the enjoyment, public health, and safety of the community. Commercial and industrial uses are not considered noise- and vibration-sensitive uses.

5.12.2 Thresholds of Significance

According to CEQA Guidelines Appendix G a project would normally have a significant effect on the environment if the project would result in:

5.12.2.1 CEQA GUIDELINES THRESHOLDS

- | | |
|-----|--|
| N-1 | 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. |
| N-2 | Exposure of persons to or generation of excessive ground borne vibration or ground borne noise levels. |
| N-3 | A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project. |
| N-4 | A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project. |

5. Environmental Analysis

NOISE

- N-5 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, expose people residing or working in the project area to excessive noise levels.
- N-6 For a project within the vicinity of a private airstrip, expose people residing or working in the project area to excessive noise levels.

5.12.2.2 FEDERAL THRESHOLDS

Development of schools exposed to annual 65 dBA L_{dn} noise levels due to aircraft noise should be prohibited.¹⁹

5.12.2.3 STATE THRESHOLDS

For new schools, the interior noise threshold for new construction is 45 dBA CNEL.

5.12.2.4 LOCAL THRESHOLDS

County of Los Angeles

Operational Stationary Noise

The county applies the noise control ordinance standards summarized in Table 5.12-5 to nontransportation sources.

Construction Noise

The county prohibits construction noise weekdays between 7:00 PM and 7:00 AM, or at any time on Sundays or holidays. The county also sets maximum noise levels from mobile and stationary equipment, summarized in Tables 5.12-6 and 5.12-7.

City of Los Angeles

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 or greater.

¹⁹ The federal 65 dBA L_{dn} is based on the annual average flight operations taking into account seasonal arrival/depart activity, weather, etc. The annual CNEL, in decibels, is the average (on an energy basis) of the daily CNEL over a 12-month period. On any given day the noise contour map may be different than the annual because of weather-related flight pattern variations, fewer flights, etc.

5. Environmental Analysis NOISE

Operational Stationary Noise

Stationary noise sources are prohibited from causing the ambient noise level to increase by more than 5 dB. Where actual ambient levels are lower than shown in Table 5.12-9, the presumed ambient noise levels in the table are used as the baseline.

Construction Noise

Construction equipment cannot produce noise exceeding 75 dBA at a distance of 50 feet between the hours of 7:00 AM and 9:00 PM.

A project would have a significant construction-related noise impact if:

- Construction activities lasting more than one day would exceed existing ambient exterior noise levels by 10 dBA or more at a noise sensitive use;
- Construction activities lasting more than 10 days in a three month period would exceed existing ambient exterior noise levels by 5 dBA or more at a noise sensitive use; or
- Construction activities would exceed the ambient noise level by 5 dBA at a noise sensitive use between the hours of 9:00 PM and 7:00 AM Monday through Friday, before 8:00 AM or after 6:00 PM on Saturday, or at any time on Sunday.

5.12.2.5 OTHER JURISDICTIONS THRESHOLDS

LAUSD uses the noise standards of the municipality where a project is located for each site-specific project CEQA analysis.

5.12.2.6 LAUSD THRESHOLDS

- Maximum exterior noise level: 70 dBA L_{10} or 67 dBA L_{eq} .
- Maximum interior classroom noise level: 55 dBA L_{10} or 45 dBA L_{eq} .
- Classroom acoustical performance: 45 dBA L_{eq} background noise level (unoccupied) or better with maximum (unoccupied) 0.6 second reverberation time.
- Maximum permanent increase noise levels at nearby noise-sensitive land uses: 3 dBA CNEL

5.12.3 Environmental Impacts

The applicable thresholds are identified in brackets after the impact statement.

5. Environmental Analysis

NOISE

Impact 5.12-1: SUP implementation may result in exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance. [Thresholds N-1]

All SUP Projects

Schools can generate noise from sports events, athletic fields, playgrounds, and parking lot activity. School projects could include features that have the potential to cause substantial noise increases at nearby receptors. Some project components would not have the potential to generate substantial noise increases—such as change in grade structure, repair and replacement of building systems such as flooring, windows and roofing; and installation of modular units/portables. However, some project types such as new athletic fields (sports events), playgrounds, parking lots, or even the installation of lights on athletic fields (new nighttime events) would have the potential to cause a significant noise increase.

Schools are typically located in residential areas, and noise generated on both the weekdays (by physical education classes and sports programs and games) and weekends (by use of the fields by youth organizations) can elevate noise levels. A worst-case scenario for a noise-generating project would be a new football stadium. Events at a stadium can generate noise levels up to 71 dBA L_{max} at about 350 feet from the field.²⁰ This could exceed the noise ordinance of the city where a new stadium is located. There are 9 jurisdictions entirely within and 23 partially within the LAUSD boundaries, and each jurisdiction adopted its own noise standards. To illustrate, for Los Angeles County, the noise ordinance limits the exterior noise at residential uses to 65 dBA L_{max} from 10:00 PM to 7:00 AM and 70 dBA L_{max} from 7:00 AM to 10:00 PM (see Table 5.12-5 above). Outdoor activities on public playgrounds and public or private school grounds, including but not limited to school athletic and school entertainment events, are typically exempt from jurisdictional municipal codes. However, under CEQA the increase in ambient noise levels would have the potential to exceed municipal code standards.

Incorporation of LAUSD SC- N-4 would include design features such as buffer zones or sound barriers such as masonry walls between playgrounds, stadiums, or other noise-generating school areas and adjacent noise-sensitive land uses to reduce noise levels. As a general rule, interrupting the noise source with a solid block wall would reduce offsite noise levels by approximately 5 dBA. There are some measures that can be incorporated into a stadium project, such as enclosing the foot wells or installing a solid back to the bleachers and installing block walls; however, there is no guarantee that these measures would reduce noise to less than significant levels. Future SUP-related projects, such as stadiums, stadium lights, playfields, etc., would have a noise assessment conducted to determine impacts to the surrounding community. In the worst-case scenario, a 5 dBA reduction and adjacent residential property may still exceed the 70 dBA L_{max} standard. While the level of noise at the residents could exceed either the daytime or nighttime standards, school-related noise is typically exempt under the jurisdictional municipal codes and in this respect does not represent a significant impact. This does not, however, exempt this noise from a significance determination under CEQA.

²⁰ Noise level data measured at a football game with attendance of approximately 4,500 total spectators at La Quinta High School on October 11, 2002. Stadium had aluminum bleachers with closed foot wells. Public address system was ‘partially localized’ (i.e., few speakers mounted on poles approximately 40 feet above the ground) pointing toward the bleachers on each side of the stadium. Noise measurement location was approximately 350 feet from the center of the field, to the side of the field and behind one set of bleachers.

5. Environmental Analysis NOISE

Therefore, school operation and/or stadium noise impacts are considered potentially significant and may not be feasibly mitigated to a level of insignificance.

Impact 5.12-2 SUP-related project construction activities may result in generation of excessive ground borne vibration. [Threshold N-2]

School operations do not involve sources that cause substantial groundborne vibration. Construction activities associated with the SUP would cause short-term vibration from activities, such as the use of heavy construction equipment, pile driving, and/or rock blasting.

All SUP Projects

The effect on buildings in the vicinity of a construction site varies depending on soil type, ground strata, and receptor-building construction. The results from vibration can range from no perceptible effects at the lowest vibration levels, to low rumbling sounds and perceptible vibrations at moderate levels, to slight structural damage at the highest levels. Vibration from construction activities rarely reaches the levels that can damage structures, but groundborne vibration and groundborne noise can reach perceptible and audible levels in buildings that are close to the construction site. Construction, improvements, and renovation of individual school facilities that may include demolition, excavation, grading, paving, and building construction may result in groundborne vibrations that could be perceptible at adjacent uses or result in architectural damage of structures. The greatest potential for vibration comes from pile driving and rock blasting, which is rarely if ever used for school buildings. Table 5.12-12 lists vibration levels for construction equipment.

5. Environmental Analysis

NOISE

Table 5.12-12 Construction Equipment Vibration Levels

Equipment	Approximate RMS Velocity at 25 feet (VdB)	Approximate PPV Velocity at 25 feet (in/sec)
Impact Pile Driver – upper range	112	1.518
Impact Pile Driver – typical	104	0.644
Vibratory Roller	94	0.210
Large Bulldozer	87	0.089
Caisson Drilling	87	0.089
Jackhammer	79	0.035
Small Bulldozer	58	0.003
Loaded Trucks	86	0.076
FTA Criteria – Human Annoyance (Daytime)	78	—
FTA Criteria – Architectural Damage	—	0.300

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

Note: RMS velocity calculated from vibration level (VdB) using the reference of 1 microinch/second and a crest factor of 4.

As shown in Table 5.12-12, vibration generated by construction equipment has the potential to be substantial. However, groundborne vibration is almost never annoying to people who are outdoors, so it is usually evaluated in terms of indoor environments.²¹

Vibration Annoyance

Vibration is typically noticed nearby when objects in a building generate noise from rattling windows or picture frames. The effect on buildings near a construction site varies depending on soil type, ground strata, and receptor building construction. The generation of vibration can range from no perceptible effects at the lowest vibration levels, to low rumbling sounds and perceptible vibrations at moderate levels, to slight damage at the highest levels. For human annoyance, the criteria of 0.1 PPV in/sec is the level at which continuous vibration begins to annoy people. Small construction equipment generates vibration levels less than 0.1 PPV in/sec at 25 feet away. However; large equipment such as vibratory roller or pile driver would generate significant vibration at 25 feet. Although vibration dissipates quickly with distance, the maximum construction-related vibration level and close distance of residential units or classrooms, vibration may exceed the 0.1 PPV in/sec threshold for annoyance. District contractors work closely with schools and nearby land uses (see LAUSD SC-N-5) and try to avoid heavy noise and vibration activities directly adjacent to noise and vibration-sensitive land uses.

Vibration-Induced Structural Damage

Construction of SUP-related projects would be site specific and would occur intermittently for varying periods of time. Grading and demolition activities typically generate the highest vibration levels. Impact pile driving and rock blasting can generate high levels in excess of 100 PPV at 25 feet away. However, typical construction projects do not require these methods, or if necessary, they can be mitigated with alternate

²¹ Federal Transit Administration (FTA). 2006, May. *Transit Noise and Vibration Impact Assessment*. United States Department of Transportation. FTA-VA-90-1003-06.

5. Environmental Analysis

NOISE

methods, such as nonexplosive rock breaking instead of rock blasting and drilled piles instead of impact pile driving. The threshold at which there is a risk of architectural damage to normal houses with plastered walls and ceilings is 0.2 in/sec. Building damage is not a factor for typical LAUSD projects, unless demolition and construction is planned directly adjacent to a building with fragile wall treatment or an older historic building. LAUSD SC-N-6, SC-N-7, and SC-N-8 would reduce structural vibration impacts during demolition and construction activities by using an acoustical engineer to identify and reduce vibrations, and avoiding vibration-intensive construction equipment or activities, if feasible.

Construction activities would occur at discrete locations in the District's boundaries, and vibration from such activity may impact existing buildings that are close enough. If alternative methods cannot be used, there is no feasible mitigation available that would reduce potential vibration impacts if receptors are in close proximity and equipment generates high vibration levels, such as pile driving. Although incorporation of the LAUSD Standard Conditions into SUP-related projects would reduce vibration levels at nearby uses, demolition and/or construction vibration may still cause annoyance and architectural damage. Thus, demolition/construction-related vibration impacts would be potentially significant and may not be feasibly mitigated to a level of insignificance.

Impact 5.12-3: Traffic generated by SUP-related projects would not result in substantial permanent increase in ambient noise levels. [Thresholds N-3]

All SUP Projects

To determine if a project would cause a substantial permanent traffic noise increase or would exceed local standards related to project related traffic, consideration must be given to the magnitude of the increase and the affected receptors. In general for community noise, a noise level increase of 3 dBA is considered barely perceptible, and an increase of 5 dBA is clearly noticeable. An increase of 3 dBA is often used as a threshold for a substantial increase. A traffic noise impact under CEQA may occur when noise-sensitive receptors along a roadway segment (1) are exposed to ambient noise levels over 60 dBA CNEL, and (2) experience a project-related traffic noise increase over 3 dBA.

Where project-related traffic exceeds 5,000 additional vehicles per day or a twofold increase in traffic, the District will conduct a noise study. According to Institute of Transportation Engineers (ITE) trip generation rates, an increase of student capacity of more than 2,900 students would be required to generate 5,000 daily trips. None of the SUP-related projects would increase traffic on roadways adjacent to existing schools by 5,000 or more, nor would they double existing traffic. However, SC-N-3 implementation to identify any noise increases over 3 dBA. Traffic-related noise impacts would be less than significant.

5. Environmental Analysis

NOISE

Impact 5.12-4: Construction activities may result substantial temporary or periodic increase in ambient noise levels in the project vicinity. [Threshold N-4]

All SUP Projects

Construction activities associated with the SUP could cause substantial short-term noise from the use of stationary and mobile construction equipment. Table 5.12-13 lists maximum construction equipment noise levels at 50 feet away and the percentage of time each piece of equipment is used.²²

²² Duty cycles (see table) are related to the percentage of utilization of each piece of equipment at typical construction phases for development projects such as schools, and are used to calculate average noise levels in a given period.

5. Environmental Analysis
NOISE

Table 5.12-13 Construction Equipment Noise Levels

Equipment	Noise Level (dBA) at 50 ft	Typical Duty Cycle
Auger Drill Rig	85	20%
Backhoe	80	40%
Blasting	94	1%
Chain Saw	85	20%
Clam Shovel	93	20%
Compactor (ground)	80	20%
Compressor (air)	80	40%
Concrete Mixer Truck	85	40%
Concrete Pump	82	20%
Concrete Saw	90	20%
Crane (mobile or stationary)	85	20%
Dozer	85	40%
Dump Truck	84	40%
Excavator	85	40%
Front End Loader	80	40%
Generator (25 KVA or less)	70	50%
Generator (more than 25 KVA)	82	50%
Grader	85	40%
Hydra Break Ram	90	10%
In situ Soil Sampling Rig	84	20%
Jackhammer	85	20%
Mounted Impact Hammer (hoe ram)	90	20%
Paver	85	50%
Impact Pile Driver	95	20%
Pneumatic Tools	85	50%
Pumps	77	50%
Rock Drill	85	20%
Scraper	85	40%
Tractor	84	40%
Vacuum Excavator	85	40%
Vibratory Concrete Mixer	80	20%

Source: Thalheimer, E., 2000, Construction Noise Control Program and Mitigation Strategy as the Central Artery/Tunnel Project. Institute of Noise Control Engineering.
Note: KVA = kilovolt amps

5. Environmental Analysis

NOISE

The County of Los Angeles has established noise limits for construction activities; however, most jurisdictions exempt noise associated with construction, repair, remodeling, demolition, and grading, as long as these activities occur during the hours established in the jurisdiction's municipal code.

SUP-related project construction would be localized and would occur intermittently for varying periods of time. Potentially affected noise-sensitive land uses include residential, schools, libraries, churches, nursing homes, hospitals, and open space/recreation areas.

All project types throughout the District would have the potential to cause some kind of temporary noise during construction. However, specific school projects have not been identified under the SUP. Information regarding specific projects, construction equipment type, length, and the location of receptors is required to quantify the level of impact associated with construction activity. Even relatively small projects with the operation of a backhoe and a loader in close proximity to a sensitive receptor would generate a combined 83 dBA L_{max} at 50 feet away, having the potential to exceed the County of Los Angeles 75 dBA L_{max} daytime standard for a residential use. Projects that require substantial site preparation and excavation would likely require several pieces of earthmoving equipment that, operating simultaneously, could generate much higher noise levels.

Incorporation of SC-AQ-42, SC-N-5, ~~SC-N-9~~ and SC-N-40-9 would reduce noise impacts during construction by limiting the construction schedule, implementing feasible noise attenuation measures, and providing advance notice to nearby noise receptors. Although compliance with local regulations and incorporation of the LAUSD Standard Conditions into each individual project would reduce noise levels at nearby sensitive receptors, construction noise may still result in a substantial increase over the ambient noise or exceed local noise standards for some SUP-related projects. Thus, construction-related noise impacts are considered potentially significant, and potentially may not be feasibly mitigated to a level of insignificance.

Impact 5.12-5: If a SUP-related project is within an airport land use plan or within two miles of a public use airport or private airstrip, it may expose students or staff to excessive noise levels. [Thresholds N-5 and N-6]

New Construction on New Property

The California Public Resources Code, Section 21096, requires that when preparing an environmental impact report for any project within an airport influence area defined by an ALUP, the lead agency shall utilize the California Airport Land Use Planning Handbook as a technical resource with respect to airport noise and safety compatibility issues. The basis for compatibility zone delineation for airports is the CNEL contours created with the FAA Integrated Noise Model for private and public airports. Airport noise in the vicinity of airports is produced from takeoffs, flyovers/overflights, approaches, and landings. Each of these events results in noise exposure to noise-sensitive receptors within close proximity to an airport.

Noise-sensitive land uses in locations where the aircraft exterior noise level does not exceed 65 dBA CNEL are compatible as long as interior habitable rooms or interior areas where quiet is a requirement (such as classrooms, labs, libraries, private offices, and meeting rooms) remain below 45 dBA CNEL.

5. Environmental Analysis

NOISE

Based on the most recent, publicly available, Los Angeles County ALUP, portions of the District are exposed to noise levels due to airport operations above 65 dBA CNEL.

SUP-related construction and modernization projects may occur within the vicinity of an existing airport, including LAX, Van Nuys Airport, Whiteman Airport, Bob Hope Airport, or Santa Monica Airport. There are only a few schools within the 65 dBA CNEL of LAX, Van Nuys, and Bob Hope Airports (see Figure 5.12-1, *Airport Noise*). About 15 out of 1,309 existing schools are within the geographic area of an ALUP; and very few new construction projects would occur under the flight path of an airport. Schools that are under a flight path are already exposed to airport noise and have additional building improvements that mitigate the noise. In addition, there are 74 private-use heliports in the 12 cities within or mostly in the District, including 69 in the City of Los Angeles. These private use heliports operate smaller aircraft and have more limited operations than major public airports, so their noise contours are generally confined to areas close to the heliport. Per Education Code Section 17215, the District must receive approval from the CDE and California Department of Transportation (Caltrans or DOT) before acquiring title to property for a school site if it is within two nautical miles of an airport runway. As part of the SUP, property may be acquired directly adjacent to existing schools to accommodate new buildings. The consideration of a proposed site in relation to airports is part of the District's CCR Title 5 and CEQA site review procedures.

According to CDE regulations,²³ the responsibilities of the school district; the California Department of Education; and the Caltrans, Aeronautics Program, Office of Airports, concerning the school site's proximity to runways are in Education Code Section 17215.^{24,25} As a part of the site selection prescreening process, the school district should determine the proximity of the site to runways. If the site is within two nautical miles of an existing airport runway or a potential runway included in an airport master plan, as measured by direct air line from the part of the runway that is nearest to a proposed school site, the following procedures must be followed before the site can be approved:

1. The governing board of the school district, including any district governed by a city board of education, shall give the Department [CDE] written notice of the proposed acquisition and shall submit any information that is required by the Department. The Department will notify the DOT Aeronautics Program, Office of Airports.
2. The Division of Aeronautics shall investigate the proposed site and, within 30 working days after receipt of the notice, shall submit to the local governing board a written report and its recommendations concerning acquisition of the site. As a part of the investigation, the Aeronautics Program shall give notice to the owner and operator of the airport, who shall be granted the opportunity to comment on the proposed school site.
3. The governing board of the school district shall not acquire title to the property until the report of the DOT Aeronautics Program has been received. If the report favors the acquisition of the property for a

²³ School Site Selection and Approval Guide. <http://www.cde.ca.gov/ls/fa/sf/schoolsiteguide.asp#Noise>.

²⁴ CCR, Title 5, Section 14011(k).

²⁵ As amended by Assembly Bill (AB) 747, Chapter 837, Statutes of 1999.

5. Environmental Analysis

NOISE

school site or an addition to a present school site, the governing board shall hold a public hearing on the matter before acquiring the site.

4. If the report does not favor the acquisition of the property for a school site or an addition to a present school site, the governing board may not acquire title to the property. If the report does not favor acquisition of a proposed site, no state funds or local funds shall be apportioned or expended for the acquisition of that site, construction of any school building on that site, or the expansion of any existing site to include that site.
5. The requirements noted above do not apply to sites acquired before January 1, 1966, or to any additions or extensions to those sites.

By following these procedures and state regulations, the LAUSD would not acquire title to a property that would conflict with findings of the DOT Aeronautics Program, which has regulations limiting the exterior and interior noise exposure to sensitive uses in the vicinity of airports. Therefore, impacts associated with airport noise would be less than significant.

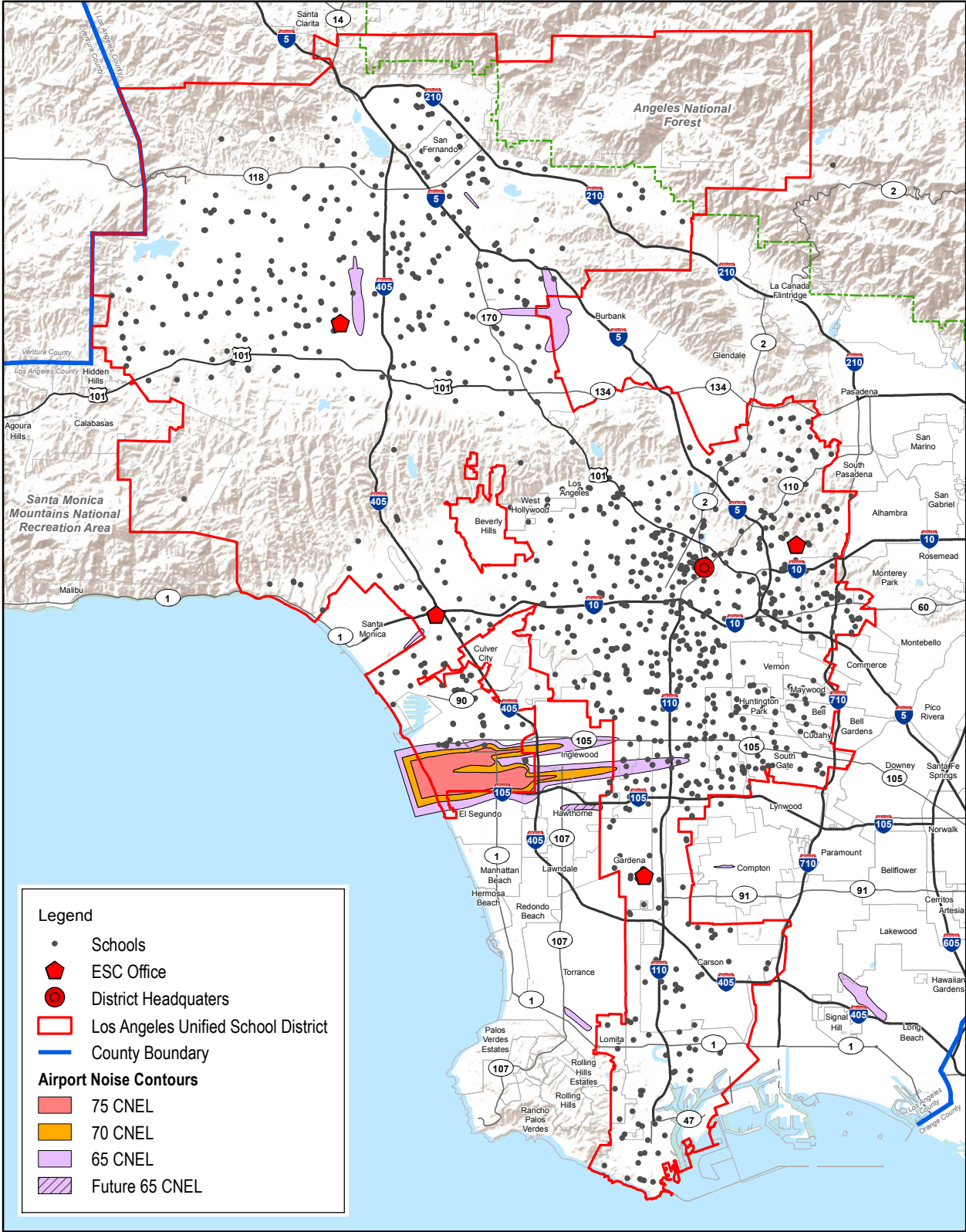
New Construction and Modernization on Existing Campus

New construction, modernization, repair, replacement, upgrade, remodel, renovation and installation would occur on existing school campuses. Several District schools are within two nautical miles of an airport. However, projects conducted on existing campuses that do not involve acquisition of new property would not need to be reviewed for airport noise. It should also be noted that Education Code Section 17215 does not apply to school sites acquired prior to January 1, 1966, nor to any additions or extensions to those sites. However, noise limits would still apply to new construction, such as a classroom on an existing campus:

- Maximum exterior noise level: 70 dBA L_{10} or 67 dBA L_{eq} .
- Maximum interior classroom noise level: 55 dBA L_{10} or 45 dBA L_{eq} .
- Classroom acoustical performance: 45 dBA L_{eq} background noise level (unoccupied) or better with maximum (unoccupied) 0.6 second reverberation time.

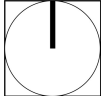
Implementation of LAUSD SC-N-2 would ensure that interior noise standards related to airport noise are identified and properly addressed prior to project construction. Measures such as upgraded windows and wall and roof design would ensure that sufficient building insulation would be provided to meet the interior noise standards. Exterior areas at existing school campuses are already exposed to airport noise, therefore new SUP-related projects would not exacerbate the airport noise. Impacts would be less than significant.

5. Environmental Analysis Figure 5.12-1 Airport Noise



Source: Los Angeles Unified School District, 2014; LA County DRP, 2013

0 6 Miles



5. Environmental Analysis

NOISE

This page intentionally left blank.

5. Environmental Analysis NOISE

5.12.4 Applicable Regulations and Standard Conditions

State

- Education Code Section 17215: notification and review by California Department of Transportation, Aeronautics Program, Office of Airports
- California Code of Regulations, Title 24 and Title 25. California Building Code Interior and Exterior Noise Standards
- California Code of Regulations, Title 21. Airport Noise Standards

Local

- Jurisdictional Municipal Codes with Community Noise standards.
- Jurisdictional General Plan Noise Elements or noise related policies.

LAUSD Standard Conditions of Approval

- SC-AQ-2
- SC-N-1 through SC-N-9

5.12.5 Level of Significance Before Mitigation

Upon implementation of regulatory requirements and LAUSD Standard Conditions listed above, the following impacts would be less than significant: 5.12-3, 5.12-5, and 5.12-6.

Even with implementation of regulatory requirements and LAUSD Standard Conditions the following impacts would be **potentially significant**:

- **Impact 5.12-1** Implementation of the SUP could result in exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance.
- **Impact 5.12-2** Construction activities could result in excessive groundborne vibration at nearby sensitive buildings or structures.
- **Impact 5.12-4** Substantial temporary or periodic increase in ambient noise levels in the project vicinity.

5. Environmental Analysis

NOISE

5.12.6 Mitigation Measures

Impact 5.12-1

No additional mitigation measures would ensure that construction noise impacts would be reduced to less than significant.

Impact 5.12-2

No additional mitigation measures would ensure that vibration annoyance and architectural damage impacts would be reduced to less than significant.

Impact 5.12-4

There are no additional feasible mitigation measures that would ensure that noise impacts during construction would be reduced to less than significant.

5.12.7 Level of Significance After Mitigation

Impact 5.12-1

Implementation of LAUSD SC-N-4 would include measures such as buffer zones, sound barriers such as masonry walls, or building orientation improvements between playgrounds and adjacent residential uses, or other special design features to reduce noise levels at nearby noise-sensitive land uses to no more than 3 dBA CNEL. However, there is no guarantee that these measures would reduce noise to less than significant levels. Therefore, outdoor noise may be significant and unavoidable.

Impact 5.12-2

Demolition and construction for activities within 25 feet of a historic building or where pile driving activities are within 150 feet of a structure may cause vibration annoyance and/or architectural damage. For these types of projects, a detailed vibration assessment would be provided by an acoustical engineer to analyze potential vibration impacts to nearby structures and to determine feasible alternatives to eliminate potential risk of annoyance and architectural damage. Implementation of LAUSD ~~SC-N-5, SC-N-6, SC-N-7, and SC-N-8~~ would reduce construction-related vibration impacts, but for some projects these LAUSD Standard Conditions may not be enough to avoid the impact. No additional ~~mitigation~~ measures are available to reduce impacts. Therefore, Impact 5.12-2 would remain significant and unavoidable.

Impact 5.12-4

Implementation of LAUSD ~~SC-AQ-2, and~~ SC-N-5 and SC-N-9 would reduce noise impacts during construction by limiting the construction schedule, implementing feasible noise attenuation measures, and providing advance notice to nearby noise receptors~~would reduce noise impacts related to stationary source noise. However, noise generated from construction equipment could still have the potential to exceed applicable thresholds at nearby sensitive uses or create substantial noise increases at nearby receptors for~~

5. Environmental Analysis NOISE

~~extended periods of time.~~ No additional mitigation measures are available to reduce impacts. Therefore, Impact 5.12-4 would remain significant and unavoidable.

5. Environmental Analysis

5.13 PEDESTRIAN SAFETY

This section of the program EIR evaluates the potential for implementation of the SUP to impact pedestrian safety in the District. This section discusses regulatory framework (plans and policies from several jurisdictional agencies and LAUSD Standard Conditions)~~plans and policies from several jurisdictional agencies and LAUSD standard conditions, guidelines, specifications, practices, policies, and project design features (LAUSD Standards)~~; general existing pedestrian and bicycle facility conditions throughout the SUP area; and possible environmental impacts that may occur as SUP-related site-specific projects are implemented during future phases of the SUP and site-specific projects implemented under the SUP.

5.13.1 Environmental Setting

5.13.1.1 REGULATORY FRAMEWORK

National, state, regional, and local laws, regulations, plans, and guidelines are summarized below, ~~along with LAUSD Standards.~~ The following regulatory framework discussion does not include all plans and policies that relate to pedestrian safety 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 date when a proposed site-specific school project undergoes review. Therefore, this section provides a general discussion of the most important plans and policies that apply to SUP-related projects. Although some of these may not directly apply to the SUP or site-specific projects implemented under the SUP, they are included to assist in identifying potential impacts and significance thresholds. Applicable LAUSD Standard Conditions of Approval are also listed. See *Applicable Regulations and Standard Conditions* at end of this chapter for those that require District compliance.

Federal

United States Code, Title 42, Chapter 126

Americans with Disabilities Act of 1990 (ADA). The United States Code is divided into titles and chapters that classify laws according to their subject matter. Titles I, II, III, and V of the original law are codified in Title 42, Chapter 126 (Equal Opportunity for Individuals with Disabilities) beginning at Section 12101. Chapter 126, Subchapter III (formerly Title III) prohibits discrimination on the basis of disability in “places of public accommodation” (businesses and non-profit agencies that serve the public) and “commercial facilities” (other businesses). The regulation includes standards for accessible design establishing minimum standards for ensuring accessibility when designing and constructing a new facility or altering an existing facility. Examples of key guidelines include detectable warnings for pedestrians entering traffic where there is no curb, a clear zone of 48 inches for the pedestrian travel way, and a vibration-free zone for pedestrians.

State

AB 1475 Street and Highways Code, Sections 2331, 2333 and 2333.5.

Safe Routes to School (SRTS) is a California Department of Transportation (Caltrans) program resulting from the 1999 passage and signing of Assembly Bill 1475 (Soto). AB1475 called for Caltrans “to establish

5. Environmental Analysis

PEDESTRIAN SAFETY

and administer a ‘Safe Routes to School’ construction program... and to use federal transportation funds for construction of bicycle and pedestrian safety and traffic calming projects.” School districts are responsible for establishing and enforcing school route plans and for siting and developing school facilities that foster a good walking environment. These responsibilities include choosing school locations that balance vehicle access with pedestrian safety needs, constructing adequate pedestrian facilities along the perimeter of the school site, and working with the local public works agency to fund and install adequate crossing protection at key points. School districts are responsible for distributing walk-route maps to parents and students prior to school opening and a pedestrian safety plan for the safe arrival and departure of students in accordance with the California Manual of Uniform Traffic Control Devices.¹

California Manual of Uniform Traffic Control Devices, Part 7: Traffic Control for School Areas

The California Manual on Uniform Traffic Control Devices (California MUTCD), issued by Caltrans, provides uniform standards and specifications for all official traffic control devices in California, pursuant to the provisions of CVC Section 21400. Part 7 of the California MUTCD sets standards for traffic control for school areas, including standards for signs, road markings, and crossing supervision.

California Government Code, Sections 65040.2 and 65302

Assembly Bill 1358, the **Complete Streets Act**, was signed into law by Governor Arnold Schwarzenegger in September 2008. As of January 1, 2011, the law requires cities and counties, when updating the part of a local general plan that addresses roadways and traffic flows, to ensure that those plans account for the needs of all roadway users. Specifically, the legislation requires cities and counties to ensure that local roads and streets adequately accommodate the needs of bicyclists, pedestrians, and transit riders, as well as motorists. At the same time, Caltrans unveiled a revised version of Deputy Directive 64, an internal policy document that now explicitly embraces Complete Streets as the policy covering all phases of state highway projects, from planning to construction to maintenance and repair.

California Vehicle Code

California law requires the city or county to implement traffic control devices requested by a school district if they are meant to mitigate safety risks for students traveling to and from school, as described below.

California Vehicle Code, Division 11, Chapter 2, Article 1, Section 21372, Guidelines for Traffic Control Devices near Schools

The Department of Transportation and local authorities shall, with respect to highways under their respective jurisdictions, establish and promulgate warrants to be used as guidelines for the placement of traffic control devices near schools for the purpose of protecting students going to and from school. Such devices may include flashing signals. Such warrants shall be based upon, but need not be limited to, the following items: pedestrian volumes, vehicle volumes, width of the roadway, physical terrain, speed of vehicle traffic,

¹ Part 7 of the California Manual of Uniform Traffic Control Devices (California MUTCD) was issued by Caltrans in 2012 (formerly School Area Pedestrian Safety Manual (1987)).

5. Environmental Analysis PEDESTRIAN SAFETY

horizontal and vertical alignment of the roadway, the distance to existing traffic control devices, proximity to the school, and the degree of urban or rural environment of the area.²

California Vehicle Code, Division 11, Chapter 2, Article 1, Section 21373, School Board Request for Traffic Control Devices

The governing board of any school district may request the appropriate city, county, city and county, or state agency to install traffic control devices in accordance with the warrants established pursuant to Section 21372. Within 90 days thereafter, the city, county, city and county, or state agency involved shall undertake an engineering and traffic survey to determine whether the requested crossing protection meets the warrants established pursuant to Section 21372. The city, county, city and county, or state agency involved may require the requesting school district to pay an amount not to exceed 50 percent of the cost of the survey. If it is determined that such requested protection is warranted, it shall be installed by the city, county, city and county, or state agency involved.³

California Vehicle Code, Division 11, Chapter 2, Article 1, Section 21368, Crosswalks near Schools

Whenever a marked pedestrian crosswalk has been established in a roadway contiguous to a school building or the grounds, it shall be painted or marked in yellow. Other established marked pedestrian crosswalks may be painted or marked in yellow if either (a) the nearest point of the crosswalk is not more than 600 feet from a school building or the grounds thereof, or (b) the nearest point of the crosswalk is not more than 2,800 feet from a school building or the grounds thereof, there are no intervening crosswalks other than those contiguous to the school grounds, and it appears that the facts and circumstances require special painting or marking of the crosswalks for the protection and safety of persons attending the school. There shall be painted or marked in yellow on each side of the street in the lane or lanes leading to all yellow marked crosswalks the following words, "SLOW-SCHOOL XING," except that such words shall not be painted or marked in any lane leading to a crosswalk at an intersection controlled by stop signs, traffic signals, or yield right-of-way signs. A crosswalk shall not be painted or marked yellow at any location other than as required or permitted in this section.

2010 California Vehicle Code, Division 11, Chapter 2, Article 2, Section 21400, Official Traffic Control Devices

This code authorizes Caltrans to adopt rules and regulations for uniform standards and specifications for all official traffic control devices, including, but not limited to, stop signs, yield right-of-way signs, speed restriction signs, railroad warning approach signs, street name signs, and lines and markings on the roadway.

² Amended Ch. 545, Stats. 1974. Effective January 1, 1975.

³ Amended Ch. 1061, Stats. 1969. Effective November 10, 1969.

5. Environmental Analysis PEDESTRIAN SAFETY

LAUSD

Standard Conditions of Approval

~~LAUSD Standard Conditions of Approval~~

This table lists the pedestrian safety related standard conditions that ~~are~~ will be included as part of each SUP-related project, as appropriate.

5. Environmental Analysis PEDESTRIAN SAFETY

PDF Reference #	Topic	Trigger for Compliance	Implementation Phase	Standard Conditions
Standard Conditions				
SC-PED-00 Compliance ₁	OEHS pedestrian Pedestrian safety Safety Analysis evaluation ns	If project increases student capacity by more than 25% or 10 classrooms-	During Project design	Caltrans SRTS program. The LAUSD is a participant in the SRTS program administered by Caltrans and 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-00 Compliance	Pedestrian safety Safety analysis Analysis	Increase if project increases student capacity by more than 25% or 10 classrooms-	During project design	Traffic and Pedestrian Safety Requirements 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. Appendix C states school traffic studies shall identify measures to ensure separation between pedestrians and vehicles along potential pedestrian routes, such as sidewalks, crosswalks, bike paths, crossing guards, pedestrian and traffic signals, stop signs, warning signs, and other pedestrian access measures.
SC-PED-00 Compliance ₃	Pedestrian safety Safety analysis Analysis	Increase if project increases student capacity by more than 25% or 10 classrooms-	During project design	Sidewalk Requirements for New Schools. LAUSD shall coordinate with the responsible traffic jurisdiction/ agency to ensure these areas are improved prior to the opening of a school. Improvements shall include, but are not limited to: <ul style="list-style-type: none"> • Clearly designate passenger loading areas with the use of signage, painted curbs, etc. • Install new walkway and/or sidewalk segments where none exist. • Any 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-00 Compliance ₄	Pedestrian safety Safety analysis Analysis	Increase student capacity by more than 25% or 10 classrooms If project increases student capacity	Prior to project approval	School Traffic Safety Reference Guide REF- 4492.1. This Reference Guide replaces Reference Guide 4492.0, School Traffic Safety, September 30, 2008. Updated information is provided, including new guidance on passenger loading zones and the Safety Valet Program. 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.

5. Environmental Analysis

PEDESTRIAN SAFETY

PDF Reference #	Topic	Trigger for Compliance	Implementation Phase	Standard Conditions
Standard Conditions				
<u>SC-PED-00 Compliance 5</u>	Safe access to school	If project includes construction of bus loading area, student drop-off/pick-up area and/or parking-	During project design	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.
Project Design Features				
<u>SC-T-43</u>	Analysis for traffic	Increase student capacity by more than 25% or 10 classrooms if project increases student capacity and/or generates additional traffic or shifts traffic patterns-	Prior to project approval	Coordinate with the local City or County jurisdiction and agree on the following: <ul style="list-style-type: none"> • Compliance with the jurisdiction's design guidelines for access, parking, and circulation in the vicinity of the project. • Scope of analysis and methodology for the traffic and pedestrian study, including trip generation rates, trip distribution, number and location of intersections to be studied, and traffic impact thresholds. • Implementation of SRTS, traffic control and pedestrian safety devices. • Fair share contribution and/or other mitigation measures for potential traffic impacts. • Traffic and pedestrian safety impact studies shall address local traffic and congestion during morning arrival times, and before and after evening stadium events. • Traffic study will use the latest version of Institute of Transportation Engineer's (ITE) Trip Generation manual to determine trip generation rates (parent vehicles, school buses, staff/faculty vehicles, and delivery vehicles) based on the size of the school facility and the specific school type (e.g., Magnet, Charter, etc.), unless otherwise required by local jurisdiction. Loading zones will be analyzed to determine the adequacy as pick-up and dropoff points. Recommendations will be developed in consultation with the local jurisdiction for curb loading bays or curb parking restrictions to accommodate loading needs and will control double parking and across-the-street loading.
<u>SC-T-24</u>	Construction Traffic	If project requires construction equipment to use public roadways-	Prior to construction	LAUSD shall require its contractors to submit a construction worksite traffic control plan to the LADOT for review prior to construction. The plan will show the location of any haul routes, hours of operation, protective devices, warning signs, and access to abutting properties LAUSD shall encourage its contractor to limit construction-related trucks to off-peak commute periods. As required by Caltrans, applicable transportation related safety measures shall be implemented during construction.

5.13.1.2 EXISTING CONDITIONS

Most District schools are in urban neighborhoods. Many District schools serve attendance areas where most of their students live within walking distance of school; pedestrian and bicycle facilities surrounding District schools vary by location.

5. Environmental Analysis PEDESTRIAN SAFETY

Roadway Network

This circulation system includes an extensive network of local streets. Most of the LAUSD boundary is within the City of Los Angeles. Most roadways are aligned on a grid system providing multiple route options for walking or biking throughout the area. The area within LAUSD boundaries has several thousand of miles of public streets and paths that accommodate a variety of nonmotorized vehicles: sidewalks, pathways, horse trails, and bike lanes.

City of Los Angeles Street and Highway Designations

Street and highway types designated in the City of Los Angeles General Plan Mobility Element include:

- **Major Highway-Class I:** 12-foot sidewalk/parkway, 6 full-time through lanes, 2 part-time parking lanes, 1 median/left turn lane.
- **Major Highway-Class II:** 12-foot sidewalk/parkway, 4 full-time through lanes, 2 part-time parking lanes, and 1 median/left turn lane.
- **Secondary Highway:** 10-foot sidewalk/parkway, 4 full-time through lanes, all-day parking, and 1 median/left turn lane.
- **Collector Street:** 10-foot sidewalk/parkway, 2 full-time through lanes, 2 full-time parking lanes.^{4,5}

Public Transit

The area is served by multiple transit operators, with networks connecting different communities within and outside of the District boundaries. The primary transit operator within Los Angeles County is the Los Angeles County Metropolitan Transportation Authority (Metro). Metro provides bus, light rail, and heavy rail (subway) services. There are two Metro heavy rail lines (i.e., Red and Purple Lines) that operate in a dedicated subway. Metro's four light rail lines (i.e., Blue, Green, Gold, and Expo) use light rail trains that run along rights-of-way ranging from complete grade separation to at-grade operation in mixed-flow traffic. Metro operates several types of bus service, including the Metro Liner service, which operates either in an exclusive right-of-way or along High Occupancy Vehicle (HOV) lanes, and bus routes in mixed traffic on its Rapid, Express, Limited Stop, Local, and Shuttle services. These bus services vary considerably in speed, frequency, and capacity.

There are several other transit operators that provide transit services within District boundaries. These transit operators include Santa Monica Municipal Bus Lines (Big Blue Bus); Culver City Transit; Orange County Transportation Authority (OCTA); Riverside Transit Agency; OmniTrans, which serves the San Bernardino Valley; Santa Clarita Transit; Gardena Transit; Torrance Transit; and Montebello Bus Lines.⁶

⁴ City of Los Angeles. 1999, September 8. General Plan Transportation Element.
<http://planning.lacity.org/cwd/gnlpln/TransElt/TE/T6StStds.pdf>.

⁵ The City of Los Angeles street classification system includes several sub-classifications omitted here.

⁶ City of Los Angeles Mobility Plan 2035 Draft EIR.

5. Environmental Analysis

PEDESTRIAN SAFETY

In addition, commuter rail services in the area are provided by Metrolink and Amtrak. Metrolink covers six counties in Southern California with seven routes. Amtrak also serves communities along the coast in Southern California. Passengers on Metrolink and Amtrak are served by stations in the San Fernando Valley and in downtown Los Angeles at Union Station, from which connecting services to their destinations are provided by Metro or LADOT. Metrolink and Amtrak trains both consist of bi-level passenger cars pulled by diesel-electric locomotives, and operate on tracks shared with freight rail traffic.

Bicycle and Pedestrian Facilities

Pedestrians and bicyclists are important users of the local roadway network traveling to and from school. Most city streets have sidewalks. The existing bicycle network is a series of interconnected streets and pathways on which bicycling is encouraged. Pursuant to the California Vehicle Code, bicycles are allowed on any street. Standard bicycle facilities are designated Class I, Class II, and Class III Bikeways.

A **Class I Bikeway** (Bicycle Path) is a paved pathway separated from motorized vehicular traffic by an open space or barrier either within the highway right-of-way or within an independent alignment. Bicycle paths can be used by bicyclists, skaters, wheelchair users, joggers, and other nonmotorized users.

A **Class II Bikeway** (Bicycle Lane) is a striped lane for one-way bicycle travel on a street.

A **Class III Bikeway** (Bicycle Route) is a shared roadway specifically identified for use by bicyclists, identified by signs only, providing a superior route based on traffic volumes and speeds, street width, directness, and/or cross-street priority.⁷

The majority of the District area is heavily developed, but development patterns and streetscape conditions vary considerably. Parts of Downtown Los Angeles, Koreatown, Hollywood, and Westwood Village, for example, are very dense with heavy traffic and few bike facilities. Some residential portions of the San Fernando Valley have narrower street widths and less-connected residential streets, but have wide shoulders and horse trails. Still other parts of the District are characterized by industrial land uses offering little in the way of pedestrian amenities.⁸

Rail Crossings

There are about 304 miles of freight and Metrolink commuter railroad tracks in the District, as well as about 50 miles of Metro Rail subway and light-rail lines.^{9,10} Most of the freight and Metrolink tracks are at ground level. Metrolink trains operate on about 56 miles of the 304 miles of tracks, mostly in the San Fernando

⁷ City of Los Angeles Department of City Planning (DCP). 2011, March 1. 2010 Bicycle Plan. <http://planning.lacity.org/cwd/gnlpln/transelt/NewBikePlan/Txt/LA%20CITY%20BICYCLE%20PLAN.pdf>.

⁸ City of Los Angeles Mobility Plan 2035 Draft EIR.

⁹ Federal Railroad Administration (FRA). 2014, April 4. FRA's GIS Application. <http://fragis.fra.dot.gov/GISFRASafety/default.aspx>.

¹⁰ Six Metrolink lines pass through the District. All six lines originate at Los Angeles Union Station in central Los Angeles. The lines and the location each line exits the District are: Ventura County Line, west of the Community of Chatsworth in the City of Los Angeles; the Antelope Valley Line, north of the Community of Sylmar in the City of Los Angeles; the San Bernardino Line, in the Community of East Los Angeles in unincorporated Los Angeles County; Riverside Line, City of Commerce; and Orange County and 91 Lines, in the City of Vernon.

5. Environmental Analysis

PEDESTRIAN SAFETY

Valley. Approximately 30 miles of Metro light rail lines—on the Blue, Gold, and Expo Lines—are at ground level.¹¹ The remaining approximately 20 miles of Metro Rail lines in the District are subway or in the median of I-105.¹²

School Travel Modes

According to a school survey conducted by the Safe Routes to School National Partnership, compared to the State of California and the nation as a whole, children in Los Angeles County were much more likely to walk to school, likely because the county is urbanized and more children live within walking distance.¹³ In Los Angeles County there are about 1.5 million children aged 5 to 15, and 79 school districts; LAUSD is by far the largest. Over half (51 percent) of these children usually traveled to school in a private vehicle, and almost one-third (32.3 percent) usually walked to school. In Los Angeles County, 7.7 percent of school children usually rode in a school bus (in LAUSD this percentage is much lower because busing is only provided for Special Needs students),¹⁴ 3.8 percent used some kind of transit, 1.1 percent reported riding a bike, and another 4 percent did not report how they usually traveled to school or were home-schooled (see Table 5.17-3 in Chapter 5.17). Although not part of the study, high school students age 16 to 18 are anticipated to have approximately the same travel modes, with possibly higher transit riders and private vehicles.

Over 30 percent of school children in Los Angeles County live within ½ mile of school (10.7 percent between ¼ and ½ mile, and 19.4 percent live less than ¼ mile), compared to 16.6 percent for the nation as a whole and 27.6 percent for the state.

For elementary and middle school students that live less than ¼ mile from school, 73 percent usually walked and 24.2 percent rode in a private vehicle. For children whose schools were ¼ to ½ mile away, about half usually walked and the other half rode in a private vehicle. Children who live over one mile from school usually rode in a private vehicle (63.4 percent), but a significant portion walked (19.6 percent). Just under 9 percent of the school children in Los Angeles County attend private school, and they are likely to live farther from school.

According to the 2010 Census data, the number of school-aged children in Los Angeles County has declined 10.0 percent from the level in 2000, and the largest losses (-21.0 percent) were for children aged 5 to 9. Over

¹¹ The segment of the Blue Line in the District extends from downtown Los Angeles to the Community of Southeast Los Angeles in the City of Los Angeles. The segment of the Gold Line in the District extends from the Community of Highland Park in the City of Los Angeles to the Community of East Los Angeles in unincorporated Los Angeles County. The segment of the Expo Line in the District extends from downtown Los Angeles to the Community of West Adams in the City of Los Angeles.

¹² Subways are the Red Line from Los Angeles Union Station (LAUS) to the Community of North Hollywood in the City of Los Angeles; the Purple Line from LAUS to Wilshire Boulevard at Western Avenue in the City of Los Angeles; and a segment of the Gold Line light rail line in the Community of Boyle Heights in the City of Los Angeles. The segment of the Green Line in the District is the median of the I-105 freeway, mostly in the Community of Southeast Los Angeles in the City of Los Angeles.

¹³ Safe Routes to School National Partnership. *Travel to School in Los Angeles County*. September 24, 2012. http://saferoutescalifornia.org/2012/09/24/19percent_lac/. This is an analysis brief summarized from *Travel to School in California: Findings from the California - National Household Travel Survey*. <http://www.travelbehavior.us/Nancy-pdfs/Travel%20to%20School%20in%20California.pdf>.

¹⁴ Additionally, even at the height of LAUSD bussing (2002-2004) when overcrowding required bussing students to schools that had seats, only 1.1 percent of students rode the bus (source: 2004 Program Environment Impact Report Traffic Impact Study. Traffic study prepared by Meyer, Mohades and Associates, Inc. January 2004). Since then LAUSD has constructed 130 new schools and bussing has been eliminated at all but one school.

5. Environmental Analysis

PEDESTRIAN SAFETY

the next 10 years student enrollment is forecast to decline 2.2 percent (see Chapter 4, *Project Description*, for more information on enrollment trends).

5.13.2 Thresholds of Significance

LAUSD has developed criteria for determining student pedestrian safety impacts. A proposed SUP-related project could result in a significant pedestrian safety impact if it would:

- PED-1 Substantially increase vehicular and/or pedestrian safety hazards due to a design feature or incompatible uses;
- PED-2 Create unsafe routes to schools for students walking from local neighborhoods;
- PED-3 Be located on a site that is adjacent to or near a major arterial roadway or freeway that may pose a safety hazard.

5.13.3 Environmental Impacts

The applicable thresholds are identified in brackets after the impact statement.

IMPACT 5.13-1: SUP-related project implementation would not substantially increase vehicular and/or pedestrian safety hazards due to a design feature or incompatible uses. [Threshold PED-1]

Some SUP-related projects would increase capacity of a school. While implementation of the SUP would not increase enrollment districtwide, projects developed pursuant to the SUP could result in increased enrollment on some campuses. Therefore, SUP implementation could increase vehicular traffic as well as pedestrian and bicycle traffic to and from some schools. Traffic impacts are analyzed in further detail in Section 5.16, *Transportation and Traffic*, of this EIR.

All SUP Projects That Generate Additional Trips

As individual projects are proposed and implemented, design development would include the use of standard engineering practices, such as standard driveway widths and turning radii and provision of adequate line of sight to avoid design elements that could result in hazards. “Sight Distance Standards” from the Caltrans Highway Design Manual relates minimum sight distance values to a range of design speeds.¹⁵

Implementation of LAUSD OEHS CEQA Specification Manual, Appendix C, Traffic and Pedestrian Safety Requirements for New Schools and the School Design Guide (SC-PED-2), requires that bus loading areas that do not overlap with car loading areas, which would reduce the potential for conflicts between cars and buses arriving and departing, especially during the busiest drop-off and pick-up periods.

Under the School Design Guide, Section 2.3 (Vehicular Access and Parking) (SC-PED-5), LAUSD will:

¹⁵ California Department of Transportation (Caltrans). 2012, May 7. Highway Design Manual. Table 201.1: Sight Distance Standards. <http://www.dot.ca.gov/hq/oppd/hdm/pdf/english/chp0200.pdf>.

5. Environmental Analysis PEDESTRIAN SAFETY

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

In addition, projects are required to accommodate ingress and egress of emergency vehicles as required by the City of Los Angeles Fire Department or other affected emergency service vehicles. All access features are subject to and must satisfy fire department code in each affected jurisdiction. New school construction and modernization projects would conform to local ordinances to ensure that adequate emergency access is provided. There would be no impact.

LAUSD has several policies to coordinate with local traffic engineering departments and to provide adequate access, parking, and circulation in the vicinity of a school site.

Additionally, pursuant to California Vehicle Code Sections 21272 and 21273, local jurisdictions must install traffic control devices required to mitigate hazards for students traveling to and from school. Local jurisdictions may request the District to reimburse the City up to 50 percent of the cost of installing such devices. Impacts would be less than significant.

Impact 5.13-2: SUP implementation would not create unsafe routes to schools for students walking from local neighborhoods. [Threshold PED-2].

All SUP Projects That Generate Additional Trips

All SUP-related projects would be carried out on or next to existing District campuses, and would be implemented in of LAUSD Standard Conditions. All projects that increase student capacity or attendance would include installation of any missing signs and roadway markings pursuant to Part 7, School Area Traffic Controls, of the California MUTCD. Impacts would be less than significant.

Impact 5.13-3: SUP-related projects would not pose a safety hazard if adjacent to or near a major arterial roadway or freeway. [Threshold PED-3]

All SUP Projects That Generate Additional Trips

LAUSD Standard Conditions require that school entrances be located whenever possible on secondary highways or collector streets, not on major highways. The California Air Resources Board's *Air Quality and Land Use Handbook* recommends that sensitive land uses, including schools, be 500 feet or more from freeways or from urban roads carrying traffic volumes of 100,000 or more vehicles per day.¹⁶ Some schools,

¹⁶ California Air Resources Board (CARB). 2005, April. *Air Quality and Land Use Handbook*. <http://www.arb.ca.gov/ch/handbook.pdf>.

5. Environmental Analysis

PEDESTRIAN SAFETY

however, were built prior to the freeways and/or regulations for siting schools, so LAUSD has some schools near high-traffic roads. If adjacent property is acquired for school expansion, the new facilities would be near the high traffic roads also. Students already walk and bike to existing schools, and safety devices—such as crosswalks, traffic lights, and signage—are already in place; therefore, additional facilities would not exacerbate any current conditions. If, however, a new facility generates a significant number of pedestrians, the District would conduct a pedestrian survey to analyze the requirement for additional safety features.

All projects implemented pursuant to the SUP would implement LAUSD Standard Conditions, including SR2S Program; School Design Guide; Traffic Safety Reference Guide; OEHS CEQA Specification Manual, Appendix C, Traffic and Pedestrian Safety Requirements for New School and Appendix D, Sidewalk Requirements for New Schools as required under SC-PED-1 through SC-PED-4, and SC-T-1 and SC-T-2. Impacts would be less than significant.

5.13.4 Applicable Regulations and Standard Conditions

Federal

- United States Code, Title 42, Section 12101 et seq.: Americans with Disabilities Act

State

- Street and Highways Code Sections 2331 et seq.: Safe Routes to Schools
- Government Code Sections 65040.2 and 65302: Complete Streets Act
- California Vehicle Code
 - Section 21372: Guidelines for Traffic Control Devices Near Schools
 - Section 21373: School Board Request for Traffic Control Devices
 - Section 21368: Crosswalks Near Schools
 - Section 21400: Official Traffic Control Devices
- California Manual of Uniform Traffic Control Devices, Part 7: Traffic Control for School Areas
- Highway Design Manual

LAUSD Standard Conditions of Approval

- SC-PED-1 through SC-PED-4
- SC-T-1 and SC-T-2

5.13.5 Level of Significance Before Mitigation

Upon implementation of regulatory requirements and LAUSD Standard Conditions listed above, the following impacts would be less than significant: 5.13-1, 5.13-2, and 5.13-3.

5. Environmental Analysis PEDESTRIAN SAFETY

5.13.6 Mitigation Measures

No mitigation measures are required.

5.13.7 Level of Significance After Mitigation

Impacts would be less than significant.

5. Environmental Analysis

5.14 POPULATION AND HOUSING

This section of the program EIR evaluates the potential for implementation of the SUP to impact population and housing in the District. This section discusses regulatory framework (plans and policies from several jurisdictional agencies and LAUSD Standard Conditions)~~plans and policies from several jurisdictional agencies and LAUSD standard conditions, guidelines, specifications, practices, policies, and project design features (LAUSD Standards)~~, along with the existing population, employment, housing, and student projections throughout the SUP area, and any possible environmental impacts that may occur as SUP-related site-specific projects are implemented~~during future phases of the SUP and site-specific projects implemented under the SUP~~.

5.14.1 Environmental Setting

5.14.1.1 REGULATORY FRAMEWORK

State laws and regulations ~~and LAUSD Standards~~ are summarized below. The following regulatory framework discussion does not include all plans and policies that relate to displacement of population and housing 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 date when a proposed site-specific school project undergoes review. Therefore, this section provides a general discussion of the most important plans and policies that apply to SUP-related projects. Although some of these may not directly applicable to the SUP or site-specific projects implemented under the SUP, they are included to assist in identifying potential impacts and significance thresholds. Applicable LAUSD Standard Conditions of Approval are also listed. See *Applicable Regulations and Standard Conditions* at end of this chapter for those that require District compliance.

State

California Government Code, Sections 7260 et seq.

The **California Relocation Assistance Law** establishes requirements governing relocation assistance and replacement housing for persons displaced due to public agency projects in California. The relocation statute is intended for the benefit of displaced persons in order to ensure that they receive fair and equitable treatment and do not suffer disproportionately as a result of programs designed for the benefit of the public as a whole.

In the acquisition of real property by a public entity, the Relocation Assistance Law ensures consistent and fair treatment for tenants and property owners. It encourages acquisition by agreement with owners and tenants, rather than condemnation, in order to avoid litigation, relieve congestion in courts, and promote confidence in public land acquisition.

5. Environmental Analysis POPULATION AND HOUSING

California Code of Regulations, Title 25, Division 1, Chapter 6

The **California State Relocation Assistance and Real Property Acquisition Guidelines** implement the California Relocation Assistance Law. The guidelines are intended to establish only minimum requirements for relocation assistance and payments. They shall not be construed to limit any other authority or obligation that a public entity may have to provide additional assistance and payments.

LAUSD

Standard Conditions of Approval

~~LAUSD Standards~~ This table lists the population and housing related standard condition that will be included as part of each SUP-related project, as appropriate.

Standard Conditions				
Reference #	Topic	Trigger for Compliance	Implementation Phase	Standard Conditions
<u>SC-PH-1</u>	<u>Property Displacement</u>	<u>Residential or business property acquisition</u>	<u>Prior to construction</u>	<u>Relocation Assistance Advisory Program</u> <u>LAUSD shall conform to all residential and business displacement guidelines presented in the LAUSD's Relocation Assistance Advisory Program which complies with all items identified in the California State Relocation Assistance and Real Property Acquisition Guidelines (California Code of Regulations Title 25, Division 1, Chapter 6).</u>

LAUSD Relocation Policies and Procedures

LAUSD policies and procedures meet the requirements of the California Relocation Assistance Law (Government Code 7260, et seq.) and the California State Relocation Assistance and Real Property Acquisition Guidelines (California Code of Regulations, Title 25, Division 1, Chapter 6). Where the California Code of Regulations is not explicit, LAUSD referred to the Federal Uniform Code, i.e., 49 C.F.R. Part 24 for guidance. The relocation assistance program not only compensates tenants and landowners for displacement, but proactively works on an individual basis with those requiring relocation. Under the program, the LAUSD would pay for relocation and would work to find comparable to existing housing in the area. If comparable housing is not available within the tenants' current range of affordability, the relocation assistance program would further compensate those being relocated so they could afford to relocate to better, available housing.

LAUSD is committed to carrying out all relocation activity to minimize the hardship of displacement, and to ensure that: (a) all persons displaced from their dwellings are relocated into housing meeting the criteria for comparable replacement housing, and (b) all persons displaced from their places of business are assisted in reestablishing with a minimum of delay and loss of earnings. The program states that all relocation activities

5. Environmental Analysis POPULATION AND HOUSING

will be consistent with the commitments made in the approved Relocation Plans. Additionally, when necessary, in accordance with Last Resort Housing Plans, replacement housing payments in excess of the normal statutory limits for owner-occupants and renters will be provided and justified. It is LAUSD's policy to treat all persons fairly and equitably and in compliance with all federal and State anti-discrimination laws.¹

5.14.1.2 EXISTING CONDITIONS

Population

The 2010 population within the District boundaries was 4,579,411, slightly less than half the 9,818,605 population of Los Angeles County.² The population forecast includes the nine cities entirely within the District, three cities mostly within the District, and unincorporated areas within the District (see Table 5.14-1).

Population Forecast Methodology for Unincorporated County Areas in District

The 2020 and 2035 general population forecast in the District was calculated using the growth forecast from the Southern California Association of Governments (SCAG) 2012 Regional Transportation Plan/Sustainable Communities Strategy.

Nine communities in unincorporated Los Angeles County are included in the population projections in Table 5.14-1: East Los Angeles in the East ~~Educations Service Center~~ Local District (ESC); Marina Del Rey, West Athens, and Westmont in the West ~~ESC~~ Local District; ~~West Athens, Westmont, and~~ Willowbrook, Florence-Graham, Walnut Park, West Carson, and West Rancho Dominguez in the South ~~ESC~~ Local District. Population projections are not broken down by individual County communities. Therefore, population growth between 2010 and 2035 was forecast by using the same growth rate for the county census data as the SCAG 2035 growth rate for the 12 cities that are entirely in the District boundary. That growth rate is 13.7 percent, shown in Table 5.14-1 under "Cities Subtotal." This rate reflects the nine unincorporated communities better than the rate for the entire unincorporated county (32.4 percent and includes rural areas) because it reflects the urban nature of the District.

¹ LAUSD Facilities Services Division. 2006, July. Relocation Policies and Procedures. http://www.laschools.org/fs-general/download/housing_and_relocation/P__and__P_vs_6_w-Title_25.pdf.

² US Census Bureau (USCB). 2014, February 11. Interactive Population Map. <http://www.census.gov/2010census/popmap/>.

5. Environmental Analysis POPULATION AND HOUSING

Table 5.14-1 Population Projections, 2020 and 2035

Area within District Boundaries	US Census 2010	SCAG Projections		Change, 2010–2035	Percent Change, 2010–2035
		2020	2035		
Cities					
Los Angeles*	3,792,621	3,991,700	4,320,600	527,979	13.9%
San Fernando*	23,645	24,400	25,500	1,855	7.8%
West Hollywood*	34,399	35,100	36,100	1,701	4.9%
Bell	35,477	35,900	36,400	923	2.6%
Carson	91,714	97,500	106,000	14,286	15.6%
Cudahy*	23,805	25,200	27,200	3,395	14.3%
Gardena*	58,829	59,700	66,200	7,371	12.5%
Huntington Park*	58,114	62,000	67,700	9,586	16.5%
Lomita*	20,256	21,000	21,900	1,644	8.1%
Maywood*	27,395	27,600	28,000	605	2.2%
South Gate	94,396	101,200	110,000	15,604	16.5%
Vernon*	112	100	100	-12	-10.7%
Cities Subtotal	4,260,763	4,481,400	4,845,700	584,937	13.7%
Unincorporated Los Angeles County**	318,648	335,149	362,393	43,745	13.7%
Total	4,579,411	4,816,549	5,208,093	628,682	13.7%

Sources: Southern California Association of Governments (SCAG). 2012, April 19. Integrated Growth Forecast. <http://www.scag.ca.gov/forecast/index.htm>;
US Census Bureau (USCB). 2014, February 11. Interactive Population Map. <http://www.census.gov/2010census/popmap/>.

Notes:

* Cities entirely with the District boundaries.

** Population growth in unincorporated areas of the District between 2010 and 2035 was forecast by multiplying the 2010 US Census count by the growth rate of the 12 cities combined. 2010 US Census counts for the nine unincorporated communities are:

East Los Angeles	126,496
West Athens	8,729
Westmont	31,853
Willowbrook	35,983
Florence-Graham	63,387
Walnut Park	15,966
West Carson	21,699
West Rancho Dominguez	5,669
Marina Del Rey	8,866
Total	318,648

The 2010 Districtwide population estimate shown in the table, 4,579,411, differs from the 2010 US Census count by 38,277, that is, about 0.8 percent of the Census count. As shown in Table 5.14-1, the population of the District is estimated to increase by about 628,682 between 2010 and 2035 (13.7 percent).

Student Population

By Grade Level

Projected student population by grade level for the entire District is shown below in Table 5.14-2.

5. Environmental Analysis POPULATION AND HOUSING

Table 5.14-2 Projected District Student Population by Grade Level

	2013-14	2018-19	2023-24	10-Year Percent Change
K	55,247	55,825	61,090	10.6%
1	50,835	49,244	51,012	0.3%
2	51,091	47,260	50,117	-1.9%
3	49,253	46,925	48,462	-1.6%
4	47,753	44,569	47,744	0.0%
5	47,420	45,714	46,539	-1.9%
6	45,116	45,599	44,923	-0.4%
7	45,208	45,822	43,086	-4.7%
8	45,304	44,220	42,695	-5.8%
9	53,339	50,909	47,081	-11.7%
10	48,284	45,303	44,387	-8.1%
11	41,823	39,349	40,500	-3.2%
12	36,505	34,268	35,777	-2.0%
Ungraded	34,144	33,130	33,429	-2.1%
Total	651,322	628,138	636,843	-2.2%

Source: LAUSD, March 27, 2014. Multi-year projections for the District as a whole and for each of the ESCs. See Appendix E-C for detailed data on student population forecast.

By Educational Service Centers

Projected District student population by ESC is in Table 5.14.3. Note that the student populations in three of the ESCs—East, North, and South—as well as the entire District are forecast to decline until the 2018-2019 school year and then gradually increase until the 2023-2024 school year, the most distant year for which student population projections are available. Table 5.14.4 shows the projected net changes in student population by ESC for the period from 2013-14 to 2018-19, and 2018-19 to 2023-24. The student population in the West ESC is projected to decline throughout the 2013-14 to 2023-24 period; the student population in the West ESC in 2023-24 would be approximately 106,826—that is, 11,503, or 9.7 percent, less than the 2013-14 population.

Table 5.14.3 Projected Student Population by ESC

	2013-14	2014-15	2015-16	2016-17	2017-18	2018-19	2019-20	2020-21	2021-22	2022-23	2023-24
East	163,653	162,426	161,558	160,644	160,815	160,002	161,358	161,723	162,286	163,453	164,424
North	206,310	204,838	203,816	202,735	203,022	202,068	203,852	204,384	205,166	206,713	208,013
South	163,030	161,179	159,695	158,175	157,730	156,327	157,043	156,792	156,732	157,253	157,580
West	118,329	116,221	114,392	112,551	111,481	109,741	109,491	108,562	107,766	107,365	106,826
District Total	651,322	644,664	639,461	634,106	633,048	628,138	631,744	631,461	631,949	634,784	636,843

Source: LAUSD, March 27, 2014. Multi-year projections for the District as a whole and for each of the ESCs.

5. Environmental Analysis POPULATION AND HOUSING

Table 5.14-4 Projected Change in Student Population by ESC

ESC	2013-14	2018-19	Change 2013-14 to 2018-19	Percent Change 2013-14 to 2018-19	2018-19	2023-24	Change 2018-19 to 2023-24	Percent Change 2018-19 to 2023-24
East	163,653	160,002	(3,651)	-2.2%	160,002	164,424	4,422	2.8%
North	206,310	202,068	(4,242)	-2.1%	202,068	208,013	5,945	2.9%
South	163,030	156,327	(6,703)	-4.1%	156,327	157,580	1,253	0.8%
West	118,329	109,741	(8,588)	-7.3%	109,741	106,826	(2,915)	-2.7%
District Total	651,322	628,138	(23,184)	-3.6%	628,138	636,843	8,705	1.4%

Source: LAUSD, March 27, 2014. Multi-year projections for the District as a whole and for each of the ESCs.

Housing

2010 US Census

Counts of housing units, households, and vacant housing units in the District are presented below in Table 5.14-53. About 61 percent of the occupied housing units in the District are renter occupied.

Table 5.14-53 Housing Units and Households within District, 2010 US Census

Housing Units	Households (occupied units)			Vacant Units	Vacancy Rate	Average Household Size
	Total	Owner Occupied	Renter Occupied			
1,645,648	1,537,566	599,370	938,196	108,082	6.6%	2.89 persons

Source: US Census Bureau (USCB). 2014, February 11. Longitudinal Employer-Household Dynamics: OnTheMap. <http://onthemap.ces.census.gov/>.

Projections for 2020 and 2035

Household projections for 2020 and 2035 from SCAG (2012) are shown in Table 5.14-64. Projections for unincorporated Los Angeles County regions in the District are prorated from 2010 US Census counts using the growth rate for 12 cities combined, as described above under *Population Projections*.

5. Environmental Analysis POPULATION AND HOUSING

Table 5.14-64 Households Projections, 2020 and 2035

Area	Households					Average household size, persons: SCAG 2035 Projections
	US Census 2010	Projections, Southern California Association of Governments		Change, 2010– 2035	Percent Change, 2010–2035	
		2020	2035			
Cities						
Los Angeles	1,318,168	1,455,700	1,626,600	308,432	23.4%	2.66
San Fernando	5,967	6,200	6,600	633	10.6%	3.86
West Hollywood	22,511	23,100	23,800	1,289	5.7%	1.52
Bell	8,870	8,900	9,000	130	1.5%	4.04
Carson	25,432	27,400	29,600	4,168	16.4%	3.58
Cudahy	5,607	6,000	6,400	793	14.1%	4.25
Gardena	20,558	21,000	23,200	2,642	12.9%	2.85
Huntington Park	14,597	15,700	16,900	2,303	15.8%	4.01
Lomita	8,068	8,100	8,200	132	1.6%	2.67
Maywood	6,559	6,600	6,700	141	2.1%	4.18
South Gate	23,278	24,800	26,100	2,822	12.1%	4.21
Vernon	28	30	30	2	7.1%	3.33
Cities Subtotal	1,459,643	1,603,530	1,783,130	323,487	22.2%	2.72
Unincorporated Areas of Los Angeles County[*]	83,572	91,810	102,125	18,553	22.2%	3.55
Total	1,543,215	1,695,340	1,885,255	342,040	22.2%	2.76

Source: US Census Bureau (USCB). 2014, February 11. Interactive Population Map. <http://www.census.gov/2010census/popmap/>.

Note:

* Households projections for unincorporated areas of Los Angeles County are prorated from the 2010 US Census count using the growth rates identified for the 12 cities combined: 9.9% for 2010–2020 and 22.2% for 2010–2035.

Employment

2011 US Census Bureau Estimates

The estimated number of jobs in the District in 2011 was 1,958,419; the number of employed residents estimated was 1,752,152.³ The estimated unemployment rate in the City of Los Angeles in December 2013 was 9.7 percent, and the corresponding rate for Los Angeles County was 8.8 percent.⁴

Projections: 2020 and 2035

Household projections for 2020 and 2035 from SCAG (2012) are shown in Table 5.14-75. Projections for unincorporated Los Angeles County regions in the District are prorated from 2011 US Census estimates using the growth rate for 12 cities combined, as described above under *Population Projections*.

³ US Census Bureau (USCB). 2014, February 11. Longitudinal Employer-Household Dynamics: OnTheMap. <http://onthemap.ces.census.gov/>.

⁴ California Employment Development Department (EDD). 2014, February 11. Monthly Labor Force Data for Cities and Census Designated Places (CDP). December 2013 – Preliminary. <http://www.labormarketinfo.edd.ca.gov/Content.asp?pageid=1006>.

5. Environmental Analysis POPULATION AND HOUSING

Table 5.14-75 Employment Projections, 2020 and 2035

Area	Employment				
	US Census Estimates 2011	Projections, Southern California Association of Governments		Change, 2011–2035	Percent Change, 2011–2035
		2020	2035		
Cities					
Los Angeles	1,492,099	1,817,700	1,906,800	414,701	27.8%
San Fernando	7,633	15,300	15,900	8,267	108.3%
West Hollywood	22,647	34,500	36,600	13,953	61.6%
Bell	11,353	9,300	9,700	-1,653	-14.6%
Carson	45,823	52,500	54,000	8,177	17.8%
Cudahy	2,456	3,500	3,700	1,244	50.7%
Gardena	22,614	28,900	30,700	8,086	35.8%
Huntington Park	12,787	16,800	17,400	4,613	36.1%
Lomita	2,603	5,000	5,200	2,597	99.8%
Maywood	2,635	3,900	4,000	1,365	51.8%
South Gate	21,990	20,000	20,600	-1,390	-6.3%
Vernon	40,869	45,700	47,300	6,431	15.7%
Cities Subtotal	1,685,509	2,053,100	2,151,900	466,391	27.7%
Unincorporated Areas of Los Angeles County*	50,947	62,058	65,044	14,097	27.7%
Total	1,736,456	2,115,158	2,216,944	480,488	27.7%

Source: US Census Bureau (USCB). 2014, February 11. Interactive Population Map. <http://www.census.gov/2010census/popmap/>; Southern California Association of Governments (SCAG). 2012, April 19. Integrated Growth Forecast. <http://www.scag.ca.gov/forecast/index.htm>.

Note:

* Employment projections for the unincorporated areas of Los Angeles County are prorated from 2011 US Census estimates using the same growth rates identified for the 12 cities combined: 21.8% for 2011–2020 and 27.7% for 2011–2035.

5.14.2 Thresholds of Significance

According to CEQA Guidelines Appendix G, a project would normally have a significant effect on the environment if the project would:

- PH-1 Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure).

5. Environmental Analysis POPULATION AND HOUSING

- PH-2 Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere.
- PH-3 Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere.

5.14.3 Environmental Impacts

The applicable thresholds are identified in brackets after the impact statement.

Impact 5.14-1: SUP-related projects would not directly or indirectly induce substantial population growth in the District. [Threshold PH-1]

New Construction on New Property or Existing Campus

New construction projects could expand the total student capacity of individual schools by constructing new classrooms or installation of portables; however, total District enrollment would not increase. Over the next 10 years student enrollment is anticipated to decrease by about 2.2 percent. New classroom seats under the SUP would meet the existing and future school housing needs of the District and would accommodate students that are currently attending District schools. Impacts would be less than significant.

Modernization, Repair, Replacement, Upgrade, Remodel, Renovation and Installation

Modernization, repair, upgrade, and renovation projects would not expand capacity and would not expand operational employment. Such projects would generate short-term construction employment; however, such construction employment is expected to be absorbed from the regional labor force rather than attracting new workers into the region. Impacts would be less than significant.

Impact 5.14-2: SUP implementation would not displace substantial numbers of existing housing, necessitating the construction of replacement housing. [Threshold PH-2]

New Construction on New Property

Because most District schools are in built-out urban areas with little vacant land available for new development, new construction on new properties may displace existing land uses on parcels adjacent to existing schools. Some existing land uses on prospective school expansion sites may consist of residential uses. SUP-related projects do not include new school construction on stand-alone sites; therefore, new property acquisition would only be for expansion of existing school campuses. The scale of potential residential displacement due to the SUP would be relatively limited. Impacts on displacement of housing would be analyzed in subsequent project-specific CEQA review. If housing displacement is unavoidable, the District would implement their Relocation Assistance Program. The program not only compensates tenants and landowners for displacement, but proactively works on an individual basis with those requiring relocation. Under the program, the LAUSD would pay for relocation and would work to find comparable existing housing in the area. If comparable housing is not available within the tenants' current range of affordability, the relocation assistance program would further compensate those being relocated so they could afford to

5. Environmental Analysis

POPULATION AND HOUSING

relocate to better, available housing. SUP implementation would not displace substantial numbers of existing housing. Impacts would be less than significant.

New Construction and Modernization on Existing Campus

New construction, modernization, repair, replacement, upgrade, remodel, renovation, and installation on existing campuses would not displace any housing. No impacts would occur.

Impact 5.14-3: SUP implementation would not displace substantial numbers of people, necessitating the construction of replacement housing. [Threshold PH-3]

All SUP Projects

The analysis of impacts to housing in Impact 5.14-2 above also applies to displacement of residents. New construction on new property may displace some residents; however, because of the small amount of property acquisitions anticipated these projects would not displace substantial numbers of people. If required, the District would implement their Relocation Assistance Program. Impacts would be less than significant.

5.14.4 Applicable Regulations and Standard Conditions

State

- California Government Code, Sections 7260, et seq.: California Relocation Assistance Law
- California Code of Regulations, Title 25, Division 1, Chapter 6, Sections 6000 et seq.: California State Relocation Assistance and Real Property Acquisition Guidelines

LAUSD Standard Conditions of Approval

- Relocation Assistance Program (Relocation Policies and Procedures). Version 6. Revised July, 2006

5.14.5 Level of Significance Before Mitigation

Upon implementation of regulatory requirements and the District's Relocation Assistance Program, the following impacts would be less than significant: 5.14-1, 5.14-2, and 5.14-3.

5.14.6 Mitigation Measures

No mitigation measures are required.

5.14.7 Level of Significance After Mitigation

Impacts would be less than significant.

5. Environmental Analysis POPULATION AND HOUSING

This page intentionally left blank.

5. Environmental Analysis

5.15 PUBLIC SERVICES

This section of the program EIR evaluates the potential for implementation of the SUP to create a significant impact related to public services in the District, including: fire protection and emergency, police protection, schools, and libraries. Park services are addressed in Section 5.15, *Recreation*. This section discusses ~~regulatory framework (plans and policies from several jurisdictional agencies and LAUSD Standard Conditions)~~ plans and policies from several jurisdictional agencies and LAUSD standard conditions, guidelines, specifications, practices, policies, and project design features (LAUSD Standards), along with the existing public services currently provided in the District and possible environmental impacts that may occur ~~as SUP-related site-specific projects are implemented during future phases of the SUP and site-specific projects implemented under the SUP.~~

State regulations ~~and LAUSD Standards~~ are summarized below. The regulatory framework discussion under each service area does not include all plans and policies that relate to public services 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 type of project and the location. Specific requirements of these laws, regulations, plans, policies, and guidelines might not be up to date when a proposed site-specific school project undergoes review; therefore, this section provides a general discussion of the most important ones. Some of these are not directly applicable to the SUP or site-specific projects implemented under the SUP; however, they are included to assist in identifying potential impacts and significance thresholds. Applicable LAUSD Standard Conditions of Approval are also listed. See *Applicable Regulations and Standard Conditions* at the end of each service section for those that require District compliance.

5.15.1 Fire Protection and Emergency Services

5.15.1.1 REGULATORY FRAMEWORK

State

California Code of Regulations, Title 24, Part 9

Requirements in the **California Fire Code** (CFC) are for building and equipment design, such as fire-rated construction, alarm systems, sprinkler systems, and means of egress; requirements for specific land uses, including airports, dry cleaners, gas stations, and automotive service businesses; hazardous materials; fire flow requirements; and fire hydrant spacing. The CFC is updated on a three-year cycle, and the 2013 CFC took effect on January 1, 2014.

California Code of Regulations, Title 24, Part 2

Current law states that every local agency enforcing building regulations, such as cities and counties, must adopt the provisions of the **California Building Code** (CBC) within 180 days of its publication date, which is established by the California Building Standards Commission. The most recent building standard adopted by the legislature and used throughout the state is the 2013 version of the CBC, often with local, more restrictive amendments that are based on local geographic, topographic, or climatic conditions. The CBC

5. Environmental Analysis PUBLIC SERVICES

includes requirements for fire and smoke protection features, fire protection systems, and means of egress. The CBC is updated on a three-year cycle, and the 2013 CBC took effect on January 1, 2014.

Requirements for structures in Fire Hazard Severity Zones are in Chapter 7A of the California Building Code, “Materials and Construction Methods for Exterior Wildfire Exposure,” and Chapter 49 of the California Fire Code, “Requirements for Wildland-Urban Interface Fire Areas.” Requirements in these two chapters cover roofing; attic ventilation; exterior walls; exterior windows and glazing; exterior doors; decking; protection of underfloor, appendages, and floor projections; and ancillary structures.

LAUSD

Standard Conditions of Approval

This table lists the public service related standard conditions that will be included as part of each SUP-related project, as appropriate.

<u>Reference #</u>	<u>Topic</u>	<u>Trigger for Compliance</u>	<u>Implementation Phase</u>	<u>Standard Conditions</u>
SC-PS-1	<u>Emergency Protection Services</u>	<u>-New building, new school, change in campus traffic circulation</u>	<u>Prior to construction</u>	<u>LAUSD shall: 1) have local fire and police jurisdictions review all construction and site plans prior to the State Fire Marshall's final approval; and 2) provide a full site plan for the local review, including all buildings, both existing and proposed, fences, drive gates, retaining walls, and other construction affecting emergency vehicle access, with unobstructed fire lanes for access indicated.</u>
SC-PS-2	<u>Emergency Preparedness & Response</u>	<u>Practice on a standard schedule during school operation & during emergencies or disaster situations</u>	<u>During school operation</u>	<u>LAUSD shall implement emergency preparedness and response procedures in all schools as required in LAUSD References, Bulletins, Safety Notes, and Emergency Preparedness Plans.</u> <ul style="list-style-type: none"> • <u>REF-5803.2 - Emergency Drills and Procedures, August 26, 2013</u> • <u>SAF:30 - Emergency Response Protocol for LASUD Exiting Facilities, March 2, 2007</u> • <u>Emergency Operations Plan, updated April 2010</u> • <u>BUL-6084.0 - Use of School Facilities in an Emergency or Disaster Situation, June 11, 2013</u> • <u>REF-5511.2 - Safe School Plans Update for 2013-2014, August 15, 2013</u> • <u>BUL-5433.1 - District Emergency Response and Preparedness, March 8, 2013</u> • <u>REF-5451.1 - School Site Emergency/Disaster Supplies, April 12, 2013</u> • <u>REF 5741.0 - Emergency Response – Communications and Response Actions, April 23, 2012</u> • <u>Other LAUSD Emergency Preparedness Plans include earthquakes, bio-terrorism, heavy rain and flooding, disturbances/demonstrations, school safety, West Nile virus precautions, procedures for reentry and cleanup of fire damaged building, disposal procedures for hazardous waste and universal waste.</u>

~~The LAUSD develops and implements programs to ensure a safe and healthy environment for the students and employees of the District. A range of fire, emergency, and safety procedures are outlined in the following documents:~~

5. Environmental Analysis PUBLIC SERVICES

- ~~REF 5803.2 – Emergency Drills and Procedures~~
- ~~SAF:30 – Emergency Response Protocol for LASUD Exiting Facilities~~
- ~~Emergency Operations Plan~~
- ~~BUL 6084.0 – Use of School Facilities in an Emergency or Disaster Situation~~
- ~~REF 5511.2 – Safe School Plans Update for 2013-2014~~
- ~~BUL 5433.1 – District Emergency Response and Preparedness~~
- ~~REF 5451.1 – School Site Emergency/Disaster Supplies~~
- ~~REF 5741.0 – Emergency Response – Communications and Response Actions~~
- ~~Other LAUSD Emergency Preparedness Plans include earthquakes, bio-terrorism, heavy rain and flooding, disturbances/demonstrations, school safety, West Nile virus precautions, procedures for reentry and cleanup of fire damaged building, disposal procedures for hazardous waste and universal waste.~~

5.15.1.2 EXISTING CONDITIONS

Fire protection agencies in the District are listed in Table 5.15-1.

5. Environmental Analysis PUBLIC SERVICES

Table 5.15-1 Fire Protection by Jurisdiction

Educational Service Center Areas/Local Districts	Jurisdictions	Fire Department
Portions of Northeast, West, East, and South; all of Northwest and Central	City of Los Angeles	Los Angeles Fire Department
Northeast	City of San Fernando	Los Angeles County Fire Department
West	City of Gardena City of West Hollywood City of Hawthorne City of Inglewood Unincorporated Los Angeles County: Marina Del Rey	Los Angeles County Fire Department
	City of Santa Monica	Santa Monica Fire Department
	City of Beverly Hills	Beverly Hills Fire Department
	City of El Segundo	El Segundo Fire Department
East	City of <u>Bell</u> City of <u>Bell Gardens</u> City of <u>Commerce</u> City of <u>Cudahy</u> City of <u>Huntington Park</u> City of <u>Lynwood</u> City of <u>Maywood</u> City of <u>South Gate</u> Unincorporated Los Angeles County: East Los Angeles	Los Angeles County Fire Department
	City of Monterey Park <u>City of Downey</u>	Monterey Park Fire Department <u>Downey Fire Department</u>
	<u>City of Monterey Park</u>	<u>Monterey Park Fire Department</u>
	<u>City of Montebello</u>	<u>Montebello Fire Department</u>
	City of Montebello <u>City of Vernon</u>	Montebello Fire Department <u>Vernon Fire Department</u>
	South	Cities of: <u>Bell</u> <u>Bell Gardens</u> <u>Carson</u> <u>Commerce</u> <u>Cudahy</u> <u>Huntington Park</u> <u>Lomita</u> <u>Lynwood</u> <u>Maywood</u> <u>Rancho Palms Verdes</u> <u>South Gate</u> Unincorporated Los Angeles County communities of: - Willowbrook - Florence-Graham - West Carson - West Rancho Dominguez

5. Environmental Analysis PUBLIC SERVICES

	City of Downey	Downey Fire Department
	City of Vernon	Vernon Fire Department
	City of Long Beach	Long Beach Fire Department
	City of Torrance	Torrance Fire Department

Sources: Los Angeles Fire Department (LAFD). Fire Stations. <http://lafd.org/find-a-fire-station>.
 Los Angeles County Fire Department (LACoFD). Fire Station Locator. <http://www.fire.lacounty.gov/index.php/about/fire-station-locator/>.
 Santa Monica Fire Department (SMFD). <http://santamonicafire.org/>.
 Beverly Hills Fire Department (BHFD). <http://www.beverlyhills.org/citygovernment/departments/firedepartment/>.
 El Segundo Fire Department. <http://www.elsegundo.org/depts/fire/>.
 Monterey Park Fire Department. <http://www.ci.monterey-park.ca.us/index.aspx?page=26>.
 Montebello Fire Department. <http://www.cityofmontebello.com/depts/fire/>.
 Downey Fire Department. <http://www.downeyca.org/gov/fire/about/default.asp>.
 Vernon Fire Department. <http://www.cityofvernon.org/departments/fire-department>.
 Long Beach Fire Department. <http://www.longbeach.gov/fire/>.
 Torrance Fire Department. <https://www.torranceca.gov/108.htm>.

5.15.1.3 THRESHOLDS OF SIGNIFICANCE

According to CEQA Guidelines Appendix G, a project would normally have a significant effect on the environment if the project would:

- FP-1 Result in a substantial adverse physical impact associated with the provisions of new or physically altered fire protection and emergency facilities, need for new or physically altered fire facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for fire protection and emergency services.

5.15.1.4 ENVIRONMENTAL IMPACTS

Impact 5.15-1: SUP-related projects would not require the construction of new or physically altered fire protection and emergency facilities. [Threshold FP-1]

All SUP Projects

New construction projects, both those on new properties and those on existing schools, could expand the total number of buildings and amount of building area, consequently generating some increase in demands for fire protection. However, the SUP would not increase District enrollment (see Chapter 4, *Project Description*). In fact, overall District enrollment is forecast to decrease by 2.2 percent over the next 10 years. Implementation of the SUP would not generate increased demands for fire protection and emergency services due to a significant increase in people on District campuses.

Additionally, individual school projects would be required to comply with fire department and department of building and safety regulations for water availability and fire hydrant pressure, and accessibility for firefighting equipment to minimize any threat of a fire. Individual projects carried out pursuant to the SUP would comply with standard design requirements in accordance with the CBC, CFC, and local fire department requirements, which include fire sprinklers, fire alarm devices, emergency access, and evacuation procedures.

5. Environmental Analysis

PUBLIC SERVICES

Modernization, repair, replacement, upgrade, remodel, renovation, and installation projects would include installation of new and upgraded fire alarms, safety and technology upgrades, and life safety and seismic safety upgrades.

All fire hazard severity zones are within wildland-urban interface areas. Any new construction or modifications to District campuses in fire hazard severity zones would comply with requirements of Chapter 7A of the CBC and Chapter 49 of the CFC. Prior to project approval, site plans would be reviewed by local fire departments to ensure safety and access as outlined in SC-PS-1. Additionally, LAUSD has several emergency procedures in place to ensure the safety of people on and around schools as outlined in SC-PS-2 (also see Chapter 5.8, *Hazards and Hazardous Materials* for detailed discussion of hazard procedures). Additionally, LAUSD has several emergency procedures in place to ensure the safety of people on and around schools. (See Chapter 5.8, *Hazards and Hazardous Materials*, for detailed discussion of procedures, and Section 5.15.1.4, below, for list of procedures.) No new or expanded fire protection services or facilities would be required. Impacts to fire protection providers are considered less than significant.

5.15.1.5 APPLICABLE REGULATIONS AND STANDARD CONDITIONS

State

- California Code of Regulations Title 24 Part 2: California Building Code
- California Code of Regulations Title 24 Part 9: California Fire Code

LAUSD Standard Conditions of Approval

- SC-PS-1 (Police review)
- ~~SC-PS-2 (Emergency Preparedness & Response) REF-5803.2 – Emergency Drills and Procedures, August 26, 2013~~
- ~~SAF:30 – Emergency Response Protocol for LASUD Exiting Facilities, March 2, 2007~~
- ~~Emergency Operations Plan, updated April 2010~~
- ~~BUL-6084.0 – Use of School Facilities in an Emergency or Disaster Situation, June 11, 2013~~
- ~~REF-5511.2 – Safe School Plans Update for 2013-2014, August 15, 2013~~
- ~~BUL-5433.1 – District Emergency Response and Preparedness, March 8, 2013~~
- ~~REF-5451.1 – School Site Emergency/Disaster Supplies, April 12, 2013~~
- ~~REF-5741.0 – Emergency Response – Communications and Response Actions, April 23, 2012~~
- ~~Other LAUSD Emergency Preparedness Plans include earthquakes, bio-terrorism, heavy rain and flooding, disturbances/demonstrations, school safety, West Nile virus precautions, procedures for reentry and cleanup of fire damaged building, disposal procedures for hazardous waste and universal waste.~~

5.15.1.6 LEVEL OF SIGNIFICANCE BEFORE MITIGATION

Upon implementation of regulatory requirements and LAUSD Standard Conditions, Impact 5.15-1 would be less than significant.

5. Environmental Analysis
PUBLIC SERVICES

5.15.1.7 MITIGATION MEASURES

No mitigation measures are required.

5.15.1.8 LEVEL OF SIGNIFICANCE AFTER MITIGATION

Impacts would be less than significant.

5.15.2 Police Protection Services

5.15.2.1 REGULATORY FRAMEWORK

LAUSD Standard Conditions of Approval

This table lists the public service related standard conditions that will be included as part of each SUP-related project, as appropriate.

<u>Reference #</u>	<u>Topic</u>	<u>Trigger for Compliance</u>	<u>Implementation Phase</u>	<u>Original Source</u>
<u>SC-PS-1</u>	<u>Emergency Protection Services</u>	<u>-New building, new school, change in campus traffic circulation</u>	<u>Prior to construction</u>	<u>LAUSD shall: 1) have local fire and police jurisdictions review all construction and site plans prior to the State Fire Marshall's final approval; and 2) provide a full site plan for the local review, including all buildings, both existing and proposed, fences, drive gates, retaining walls, and other construction affecting emergency vehicle access, with unobstructed fire lanes for access indicated.</u>
<u>SC-PS-2</u>	<u>Emergency Preparedness & Response</u>	<u>Practice on a standard schedule during school operation & during emergencies or disaster situations</u>	<u>During school operation</u>	<u>LAUSD shall implement emergency preparedness and response procedures in all schools as required in LAUSD References, Bulletins, Safety Notes, and Emergency Preparedness Plans.</u> <ul style="list-style-type: none"> • <u>REF-5803.2 - Emergency Drills and Procedures, August 26, 2013</u> • <u>SAF:30 - Emergency Response Protocol for LASUD Exiting Facilities, March 2, 2007</u> • <u>Emergency Operations Plan, updated April 2010</u> • <u>BUL-6084.0 - Use of School Facilities in an Emergency or Disaster Situation, June 11, 2013</u> • <u>REF-5511.2 - Safe School Plans Update for 2013-2014, August 15, 2013</u> • <u>BUL-5433.1 - District Emergency Response and Preparedness, March 8, 2013</u> • <u>REF-5451.1 - School Site Emergency/Disaster Supplies, April 12, 2013</u> • <u>REF 5741.0 - Emergency Response – Communications and Response Actions, April 23, 2012</u> • <u>Other LAUSD Emergency Preparedness Plans include earthquakes, bio-terrorism, heavy rain and flooding, disturbances/demonstrations, school safety, West Nile virus precautions, procedures for reentry and cleanup of fire damaged building, disposal procedures for hazardous waste and universal waste.</u>

5.15.2.1

5. Environmental Analysis

PUBLIC SERVICES

The LAUSD develops and implements programs to ensure a safe and healthy environment for the students and employees of the District. A range of fire, emergency, and safety procedures are outlined in the following documents:

- ~~REF 5803.2 Emergency Drills and Procedures~~
- ~~SAF:30 Emergency Response Protocol for LASUD Exiting Facilities~~
- ~~Emergency Operations Plan~~
- ~~BUL 6084.0 Use of School Facilities in an Emergency or Disaster Situation~~
- ~~REF 5511.2 Safe School Plans Update for 2013-2014~~
- ~~BUL 5433.1 District Emergency Response and Preparedness~~
- ~~REF 5451.1 School Site Emergency/Disaster Supplies~~
- ~~REF 5741.0 Emergency Response Communications and Response Actions~~
- ~~Other LAUSD Emergency Preparedness Plans include earthquakes, bio-terrorism, heavy rain and flooding, disturbances/demonstrations, school safety, West Nile virus precautions, procedures for reentry and cleanup of fire damaged building, disposal procedures for hazardous waste and universal waste.~~

5.15.2.2 EXISTING CONDITIONS

The Los Angeles School Police Department (LASPD) is the primary provider of police protection to District schools. The Los Angeles Police Department (LAPD) and Los Angeles County Sheriff's Department (LASD) are secondary providers. Police agencies in the District by jurisdiction are listed in Table 5.15-2.

5. Environmental Analysis
PUBLIC SERVICES

Table 5.15-2 Police Protection by Jurisdiction

Educational Service Center Areas/Local Districts	Jurisdiction	Police Department
Portions of Northeast, West, East, and South; all of Northwest and Central	City of Los Angeles	Los Angeles Police Department
Northeast	City of San Fernando	San Fernando Police Department
West	City of West Hollywood Unincorporated Los Angeles County: Marina Del Rey	Los Angeles County Sheriff's Department
	City of Gardena	Gardena Police Department
	City of Hawthorne	Hawthorne Police Department
	City of Inglewood	Inglewood Police Department
	City of Santa Monica	Santa Monica Police Department
	City of Beverly Hills City of El Segundo	Beverly Hills Police Department El Segundo Police Department
East	City of Commerce City of Lynwood City of Maywood Unincorporated Los Angeles County: East Los Angeles	Los Angeles County Sheriff's Department
	City of Bell City of Monterey Park	Bell Police Department Monterey Park Police Department
	City of Bell Gardens	Bell Gardens Police Department
	City of Cudahy	Cudahy Police Department
	City of Huntington Park	Huntington Park Police Department
	City of Montebello	Montebello Police Department
	City of Monterey Park City of South Gate City of Montebello	Monterey Park Police Department South Gate Police Department Montebello Police Department
South	City of Bell City of Bell Gardens City of Carson City of Commerce City of Lomita City of Lynwood City of Maywood City of Rancho Palos Verdes Unincorporated Los Angeles County communities of: - Florence-Graham - West Carson - West Rancho Dominguez - Willowbrook - City of Cudahy - City of Huntington Park - City of South Gate	Bell Police Department Bell Gardens Police Department Los Angeles County Sheriff's Department Cudahy Police Department Huntington Park Police Department South Gate Police Department
	City of Long Beach	Long Beach Police Department
	City of Torrance	Torrance Police Department

Sources: Los Angeles Police Department (LAPD). 2014, February 5. Our Communities. http://www.lapdonline.org/our_communities.

5. Environmental Analysis

PUBLIC SERVICES

San Fernando Police Department. 2014, February 5. http://www.ci.san-fernando.ca.us/city_government/departments/police/.
Los Angeles County Sheriff's Department (LASD). Patrol Stations. <http://sheriff.lacounty.gov/wps/portal/lasd/residents/patrolstations>.
Gardena Police Department. <http://www.gardenapd.org/>.
Hawthorne Police Department. <http://hawthornepolice.com/>.
Inglewood Police Department. <http://www.inglewoodpd.org/>.
Santa Monica Police Department. <http://www.santamonicapd.org/>.
Beverly Hills Police Services. <http://www.beverlyhills.org/search/website/?Q=services%20police&NFR=1>.
El Segundo Police Department. <http://www.elsegundo.org/depts/police/default.asp>.
Monterey Park Police Department. <http://www.ci.monterey-park.ca.us/index.aspx?page=31>.
Montebello Police Department. <http://www.cityofmontebello.com/depts/police/>.
Bell Police Department. <http://www.cityofbell.org/?navid=106>.
Bell Gardens Police Department. <http://www.bellgardens.org/GOVERNMENT/PublicSafety/PoliceDepartment.aspx>.
Cudahy Police Department. <http://www.cudahy-wi.gov/cudahy/Departments/police/default.asp>.
Huntington Park Police Department. <http://www.huntingtonparkpd.org/>.
South Gate Police Department. <http://www.sogate.org/index.cfm?fuseaction/nav/navid/19/>.
Long Beach Police Department. <http://www.longbeach.gov/police/>.
Torrance Police Department. <http://www.torranceca.gov/97.htm>.

Los Angeles Police Department

The City of Los Angeles is divided into 21 LAPD divisions, each with its own community police station.¹ Currently, the LAPD has approximately 9,000 sworn officers and 3,000 civilian employees.²

Los Angeles County Sheriff's Department

The Los Angeles County Sheriff's Department patrols over 3,100 of the county's 4,083 square miles; its service area has a population of over four million. The LASD has 23 patrol stations. Budgeted positions in 2012 included 10,405 total sworn officers out of a total staff of 19,491.³

District Police

The **Los Angeles School Police Department** (LASPD) is the largest independent school police department in the United States, with over 350 sworn police officers, 126 nonsworn school safety officers (SSO), and 34 civilian support staff dedicated to serving LAUSD. Most District high schools are assigned a full-time LASPD officer who provides on-campus security. A sufficient number of officers are available to respond to the remaining schools in the LAUSD. In the event of an emergency that would require additional officers, a back-up LASPD patrol force is also available. LASPD's headquarters are in central Los Angeles near the District headquarters. LASPD operates out of four additional division offices: Valley West, in the Community of Van Nuys in the City of Los Angeles; Valley East, in the Community of Pacoima in the City of Los Angeles; West, in the Community of Venice in the City of Los Angeles; and South, in the Community of Willowbrook in unincorporated Los Angeles County.

An SSO is a civilian, unarmed employee of the LASPD that receives additional training and equipment, enabling them to provide a safe educational environment when assigned to a school campus or other LAUSD site. Some SSOs may work at a location by themselves or with school police officers.

¹ Los Angeles Police Department (LAPD). Our Communities. http://www.lapdonline.org/our_communities.

² Los Angeles Police Department (LAPD). COMPSTAT Plus. http://www.lapdonline.org/inside_the_lapd/content_basic_view/6364.

³ Los Angeles County Sheriff's Department (LASD). 2014, January 3. Year in Review 2012. http://file.lacounty.gov/lasd/cms1_207718.pdf.

5. Environmental Analysis PUBLIC SERVICES

5.15.2.3 THRESHOLDS OF SIGNIFICANCE

According to CEQA Guidelines Appendix G, a project would normally have a significant effect on the environment if the project would:

PP-1 Result in a substantial adverse physical impact associated with the provisions of new or physically altered police facilities, need for new or physically altered police facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for police protection services.

5.15.2.4 ENVIRONMENTAL IMPACTS

Impact 5.15-2: SUP-related projects would not require the construction of new or physically altered police protection facilities. [Threshold PP-1]

New Construction on New Properties and Existing Campus

Demands for police protection are generated more by the number of people in a service area than by numbers of buildings or total building area.

The SUP would not increase District enrollment. In fact, overall District enrollment is forecast to decrease by 2.2 percent over the next 10 years. Implementation of the SUP would not generate increased demands for police services due to a significant increase in people on District campuses.

Individual school projects would include both design features and provisions for LASPD police officers in order to ensure a high level of safety and security at future school projects and in the immediately surrounding area. The entries and boundaries of school campuses are fenced, secured, and carefully controlled by the LAUSD staff and the LASPD. Marked LASPD police vehicles patrol high schools on a regular basis. LAUSD maintains a cooperative working relationship between the LASPD and affected local and regional law enforcement agencies who act as backup. Prior to project approval, site plans would be reviewed by local police departments to ensure safety and access as outlined in SC-PS-1. Additionally, LAUSD has several emergency procedures in place to ensure the safety of people on and around schools as outlined in SC-PS-2 ~~-(also see Chapter 5.8, *Hazards and Hazardous Materials* for detailed discussion of hazard procedures, and Section 5.15.2.5 below for list of procedures.)~~. Impacts to police services would be less than significant.

Modernization, Repair, Replacement, Upgrade, Remodel, Renovation and Installation

Modernizations and upgrade-type projects would not expand capacity and would not expand District enrollment. These types of projects would not cause an increase in demands for police protection or emergency medical services, and no impact would occur.

5. Environmental Analysis PUBLIC SERVICES

5.15.2.5 APPLICABLE REGULATIONS AND STANDARD CONDITIONS

LAUSD Standard Conditions of Approval

- ~~SC-PS-1 (Police Review)~~
- ~~SC-PS-2 (Emergency Preparedness & Response) REF-5803.2 – Emergency Drills and Procedures, August 26, 2013~~
- ~~SAF-30 – Emergency Response Protocol for LASUD Exiting Facilities, March 2, 2007~~
- ~~Emergency Operations Plan, updated April 2010~~
- ~~BUL-6084.0 – Use of School Facilities in an Emergency or Disaster Situation, June 11, 2013~~
- ~~REF-5511.2 – Safe School Plans Update for 2013-2014, August 15, 2013~~
- ~~BUL-5433.1 – District Emergency Response and Preparedness, March 8, 2013~~
- ~~REF-5451.1 – School Site Emergency/Disaster Supplies, April 12, 2013~~
- ~~REF-5741.0 – Emergency Response – Communications and Response Actions, April 23, 2012~~
- ~~Other LAUSD Emergency Preparedness Plans include earthquakes, bio-terrorism, heavy rain and flooding, disturbances/demonstrations, school safety, West Nile virus precautions, procedures for reentry and cleanup of fire damaged building, disposal procedures for hazardous waste and universal waste.~~

5.15.2.6 LEVEL OF SIGNIFICANCE BEFORE MITIGATION

Upon implementation of LAUSD Standard Conditions, Impact 5.15-2 would be less than significant.

5.15.2.7 MITIGATION MEASURES

No mitigation measures are required.

5.15.2.8 LEVEL OF SIGNIFICANCE AFTER MITIGATION

Impacts would be less than significant.

5.15.3 School Services

Implementation of the SUP would make improvements at District schools. The SUP would not increase the population in the District and would not generate new students. The SUP would develop new and expanded buildings at existing schools. Impacts of such developments are analyzed throughout this EIR. No school service impacts would occur.

5. Environmental Analysis PUBLIC SERVICES

5.15.4 Library Services

5.15.4.1 ENVIRONMENTAL SETTING

The District is served by two library systems, the Los Angeles Public Library and the County of Los Angeles Public Library.

Los Angeles Public Library

The Los Angeles Public Library has 72 branch libraries, including the Central Library in downtown Los Angeles.⁴ The LAPL's collection consists of over six million books, audiobooks, periodicals, DVDs, and CDs.⁵

County of Los Angeles Public Library

The County of Los Angeles Public Library (CLAPL) operates 85 county libraries; its collection currently includes over 7.5 million books, magazines, DVDs, audiobooks, eBooks, downloadable eBooks and audiobooks, and CDs.^{6,7} ~~Cities and communities in the District served by the CLAPL include:~~

- ~~■ Northwest Local District Educational Service Center Area:~~
- ~~● City of San Fernando~~
- ~~■ East Educational Service Center Area:~~
- ~~● Community of East Los Angeles, unincorporated Los Angeles County~~
- ~~■ West Educational Service Center Area~~
- ~~● City of Gardena~~
- ~~● City of West Hollywood~~
- ~~—— Community of Marina Del Rey, unincorporated Los Angeles County~~
- ~~—— East~~
- ~~—— Cities of:~~
- ~~—— Bell~~
- ~~—— Cudahy~~

⁴ Los Angeles Public Library (LAPL). 2012, November 29. Library Directory. http://www.lapl.org/sites/default/files/media/pdf/about/branch_map.pdf.

⁵ Los Angeles Public Library (LAPL). Collections & Resources. <http://www.lapl.org/collections-resources>.

⁶ County of Los Angeles Public Library (CLAPL). Find Your Library. <http://www.colapublib.org/libs/>.

⁷ County of Los Angeles Public Library (CLAPL). About Us. <http://www.colapublib.org/aboutus/index.html>.

5. Environmental Analysis PUBLIC SERVICES

- Huntington Park
- Maywood
- South Gate
- South Educational Service Center Area
- Cities of:
- Bell
- Carson
- Cudahy
- Gardena
- Huntington Park
- Lomita
- Maywood
- South Gate
- Unincorporated Los Angeles County communities:
- West Carson
- Willowbrook
- Florence-Graham
- West Rancho Dominguez⁸

The Los Angeles Public Library and County of Los Angeles Public Library are both members of the Southern California Library Cooperative (SCLC), a consortium of 38 independent city, county, and special district public libraries in Los Angeles and Ventura counties that cooperate in providing library service to the residents of all participating jurisdictions. SCLC members extend loan privileges to members of other SCLC libraries.⁹

⁸ County of Los Angeles Public Library (CLAPL). Find Your Library. <http://www.colapublic.org/libs/>.

⁹ Southern California Library Cooperative (SCLC). <http://www.socallibraries.org/>.

5. Environmental Analysis PUBLIC SERVICES

5.15.4.2 THRESHOLDS OF SIGNIFICANCE

According to CEQA Guidelines Appendix G, a project would normally have a significant effect on the environment if the project would:

- LS-1 Result in a substantial adverse physical impact associated with the provisions of new or physically altered library facilities, need for new or physically altered library facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for library services.

5.15.4.3 ENVIRONMENTAL IMPACTS

Impact 5.15-3: SUP-related projects would not require the construction of new or physically altered library facilities. [Threshold LS-1]

All SUP Projects

Demands for library services and facilities are generated by the population in the libraries' service areas. Implementation of the SUP would not increase the population in the District and would not generate new students. Therefore, the SUP would not generate increased demands on public library services; it would accommodate student enrollment. Most LAUSD schools have a library that is used by students. Impacts would be less than significant.

5.15.4.4 APPLICABLE REGULATIONS AND STANDARD CONDITIONS

- None.

5.15.4.5 LEVEL OF SIGNIFICANCE BEFORE MITIGATION

Impact 5.15-4 would be less than significant.

5.15.4.6 MITIGATION MEASURES

No mitigation measures are required.

5.15.4.7 LEVEL OF SIGNIFICANCE AFTER MITIGATION

Impacts would be less than significant.

5. Environmental Analysis

5.16 RECREATION

This section of the program EIR evaluates the potential for implementation of the SUP to impact recreation facilities and parks in the District. The section discusses plans and policies from the Education Code, along with the existing recreation facilities throughout the SUP area, and possible environmental impacts that may occur as SUP-related site-specific projects are implemented, during future phases of the SUP.

5.16.1 Environmental Setting

5.16.1.1 REGULATORY FRAMEWORK

State regulations are summarized below. The following regulatory framework discussion does not include all plans and policies that relate to recreation 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 type of project and the location. Specific requirements might not be up to date when a proposed site-specific school project undergoes review; therefore, this section provides a general discussion of the most important one.

State

California Education Code Section 38131.b

The **Civic Center Act** permits public use of school facilities. Organizations and uses qualifying for Civic Center permits are shown in Table 5.16-1. School facilities available for Civic Center use include gyms, playing fields, stadiums, auditoriums, multipurpose rooms, cafeterias, and classrooms. Facilities are available within designated time frames outside school hours. Organizations wishing to use a school location for a Civic Center use must apply for a permit from the District. A variety of rules, regulations, and restrictions governing the use of school buildings for civic center purposes appear in detail on the permit and the application.

5. Environmental Analysis RECREATION

Table 5.16-1 Civic Center Organizations and Uses

Qualify for Civic Center Permits	Do Not Qualify for Civic Center Permits
Parent-Teacher Associations (PTAs)	For-profit organizations
Girl/Boy Scout Troops	Swimming pools
Senior citizens' organizations	Private school activities
Youth groups	Parking lots
Recreational activities of clubs and associations concerned with education, recreation, arts, politics, economics, charity	Religious services
Meetings/discussions open to the general public concerned with education, politics, economics, arts, charities, culture, community moral interests	Political campaign headquarters
Exercise classes such as jazzercise, aerobics, and jujitsu	Cultural classes
Good news clubs	Invitation only and exclusive meetings
Authorized Ballroom dances sponsored by Youth Services and PTAs	Tennis courts
	Roller blading
	Gymnastics
	Karate
	Child care and enrichment programs
	Wrestling
	Hammer throwing and discus
	Nonauthorized ballroom dances
	Picnics
	Weight lifting

5.16.1.2 EXISTING CONDITIONS

Major Recreational Facilities

Major recreational facilities in the District are described below by ~~Educational Service Center (ESC) Local District~~. Major recreational areas listed are limited to federal, state, and county facilities; ~~city parks are included in summaries below by city.~~

Northwest Local District ~~ESC~~

- ~~Santa Susana Pass State Historic Park~~

5. Environmental Analysis RECREATION

Northeast Local District

- ~~—~~ Angeles National Forest: about 700,000 acres; 50 campgrounds; 557 miles of hiking and equestrian trails.¹⁻²
- ~~—~~ Santa Susana Pass State Historic Park
- Verdugo Mountains State Park property
- El Cariso Community Regional Park in the Community of Sylmar in the City of Los Angeles
- Veterans Memorial Community Regional Park in the Community of Sylmar in the City of Los Angeles
- ~~—~~ Santa Clarita Woodlands Park (portions owned and operated by City of Los Angeles and Los Angeles County)

Central Local District

- ~~—~~ Rio de Los Angeles State Park next to the Community of Mt. Washington in the City of Los Angeles
-

East ESG Local District

- Earnest E. Debs Regional Park in the Community of Lincoln Heights in the City of Los Angeles
- ~~—~~ Los Angeles State Historic Park next to the Community of Chinatown in the City of Los Angeles
- ~~—~~ Rio de Los Angeles State Park next to the Community of Mt. Washington in the City of Los Angeles
- Belvedere Community Regional Park in the Community of East Los Angeles in unincorporated Los Angeles County.

West ESG Local District

- Santa Monica Mountains National Recreation Area (includes Topanga State Park)
- Santa Monica State Beach in the City of Santa Monica
- Dockweiler State Beach in the Community of Playa Del Rey in the City of Los Angeles

¹ ~~—~~ The southwest boundary of the San Gabriel Mountains National Monument, established in 2014, is just outside the northeast District boundary. The San Gabriel Mountains National Monument spans about 346,000 acres, 99 percent of which is in the Angeles National Forest. Angeles National Forest. 2014, February 24. Hiking. <http://www.fs.usda.gov/activity/angeles/recreation/hiking>.

² Angeles National Forest. 2014, February 24. Hiking. <http://www.fs.usda.gov/activity/angeles/recreation/hiking>.

5. Environmental Analysis RECREATION

- ~~_____~~ Kenneth Hahn State Recreation Area in the Community of Ladera Heights in unincorporated Los Angeles County.³
- ~~Jesse Owens Community Regional Park in the Community of South Los Angeles in the City of Los Angeles~~
- _____
- Will Rogers State Historic Park

South ~~ESCLocal District~~

- Ken Malloy Harbor Regional Park in the Community of Wilmington in the City of Los Angeles
- Deane Dana Friendship Park and Nature Center in the Community of San Pedro in the City of Los Angeles
- ~~_____~~ Earvin Magic Johnson County Recreation Area in the Community of Willowbrook in unincorporated Los Angeles County.
- ~~Jesse Owens Community Regional Park in the Community of South Los Angeles in the City of Los Angeles~~
- Victoria Community Regional Park in the City of Carson

Proposed Rim of the Valley Corridor Special Resource Study

A Special Resource Study and Environmental Assessment for a 400,000-acre area including the Santa Monica Mountains, western San Gabriel Mountains, Santa Susana Mountains, and Simi Hills are under preparation by the National Park Service, with completion anticipated in 2014.⁴ The purpose of the special resource study is to determine whether any portion of the Rim of the Valley Corridor study area is eligible to be designated as a unit of the national park system or added to an existing national park. The study will also explore other ways that private or governmental entities can protect resources and provide more outdoor recreation opportunities.⁵ The Rim of the Valley Corridor study area includes parts of the Northwest, Northeast, West, and Central Local Districts, and the northwest edge of the East Local District. ~~North and West Educational Service Center areas.~~

³ Part of the Kenneth Hahn State Recreation Area is in the City of Los Angeles; the Community of Ladera Heights in unincorporated Los Angeles County.

⁴ An Environmental Assessment is a type of environmental documentation prepared for compliance with the National Environmental Policy Act (NEPA).

⁵ National Park Service (NPS). 2014, February 12. Rim of the Valley Corridor Special Resource Study. <http://www.nps.gov/pwro/rimofthevalley/index.htm>.

5. Environmental Analysis RECREATION

City Parks

Los Angeles

The City of Los Angeles has 420 parks totaling approximately 15,700 acres. The largest city park, Griffith Park, spans 4,282 acres in the ~~North-West and Central-East Educational Service Center areas~~ Local Districts.⁶ Notable facilities in Los Angeles city parks include the Griffith Observatory in Griffith Park and the Cabrillo Marine Aquarium in San Pedro. Major recreational facilities, in addition to Griffith Park, include Hansen Dam Recreation Area and Sepulveda Dam Recreation Area.

Other Cities

Northwest ~~ESC Area~~ Local District

- San Fernando: seven parks⁷

West ~~ESC Area~~ Local District

- West Hollywood: seven parks⁸

East Local District

- Bell: seven parks⁹
- Cudahy: four parks¹⁰
- Huntington Park: seven parks, total over 31 acres¹¹
- Maywood: three parks¹²
- South Gate: nine parks, total about 172 acres¹³

South ~~ESC Area~~ Local District

- Bell: seven parks¹⁴
- Carson: 15 parks, total over 110 acres¹⁵
- Cudahy: four parks¹⁶

⁶ City of Los Angeles Department of Recreation and Parks. 2014, February 3. Who We Are. <http://www.laparks.org/dos/dept/who.htm>.

⁷ City of San Fernando. 2014, February 3. Park Facilities. <http://www.sfrcs.com/park-facilities/>.

⁸ City of West Hollywood. 2014, February 3. Parks and Facilities. <http://www.weho.org/residents/recreation-services/parks-and-facilities>.

⁹ City of Bell. 2014, February 3.

¹⁰ City of Cudahy. 2014, February 3. About the City. <http://www.cityofcudahy.com/about/about.asp>.

¹¹ City of Huntington Park. 2014, February 3. City Parks. <http://www.huntingtonpark.org/index.aspx?NID=28>.

¹² City of Maywood. 2014, February 3. Parks & Recreation Description.

http://www.cityofmaywood.com/index.php?option=com_content&view=article&id=162&Itemid=165.

¹³ City of South Gate. 2014, February 3. City Parks. <http://www.sogate.org/download/index.cfm/fuseaction/download/cid/444/>.

¹⁴ City of Bell. 2014, February 3.

¹⁵ City of Carson. 2014, February. Parks. http://ci.carson.ca.us/content/department/pub_service/parks_rec_parks.asp.

5. Environmental Analysis

RECREATION

- Gardena: seven parks¹⁷
- ~~Huntington Park: seven parks, total over 31 acres¹⁸~~
- Lomita: five parks¹⁹
- ~~Maywood: three parks²⁰~~
- ~~South Gate: nine parks, total about 172 acres²¹~~

In addition to city parks summarized above, the County of Los Angeles Department of Parks and Recreation provides local parks in unincorporated areas: for instance, six county parks in the Community of East Los Angeles.²²

5.16.2 Thresholds of Significance

According to CEQA Guidelines Appendix G a project would normally have a significant effect on the environment if the project:

- REC-1 Would increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated.
- REC-2 Includes recreational facilities or requires the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.

5.16.3 Environmental Impacts

The applicable thresholds are identified in brackets after the impact statement.

Impact 5.16-1: SUP implementation would not cause substantially physical deterioration in parks or recreational facilities. [Threshold REC-1]

All SUP Projects

The SUP would not increase population in the District. The SUP would expand existing schools; replace, modernize, and repair existing buildings at existing schools; and make other improvements at existing schools, including installation of photovoltaic panels and wind arrays. Demands for parks are generated by the populations in the parks' service areas. Thus, the SUP would not create increased demands for parks and recreational facilities. No impact would occur.

¹⁶ City of Cudahy. 2014, February 3. About the City. <http://www.cityofcudahy.com/about/about.asp>.

¹⁷ City of Gardena. 2014, February 3. Facilities. <http://www.ci.gardena.ca.us/facilities.html>.

¹⁸ City of Huntington Park. 2014, February 3. City Parks. <http://www.huntingtonpark.org/index.aspx?NID=28>.

¹⁹ City of Lomita. 1998, December. Lomita General Plan Land Use Element. <http://www.lomita.com/cityhall/citygov/pzbs/generalplan/landuse.pdf>.

²⁰ City of Maywood. 2014, February 3. Parks & Recreation Description. http://www.cityofmaywood.com/index.php?option=com_content&view=article&id=162&Itemid=165.

²¹ City of South Gate. 2014, February 3. City Parks. <http://www.sogate.org/download/index.cfm/fuseaction/download/cid/444/>.

²² County of Los Angeles Department of Parks and Recreation. 2014, February 3. Parks Locator. <http://parks.lacounty.gov/wps/portal/dpr/parkslocator/>.

5. Environmental Analysis RECREATION

Impact 5.16-2: SUP implementation would not have an adverse physical effect on the environment from the provision of new and/or expanded recreational facilities. [Threshold REC-2]

All SUP Projects

The SUP would not develop recreational facilities outside District-owned property. District schools include athletic and recreational facilities. The SUP would include repair, modernization, upgrade, and replacements of athletic facilities, including play equipment, and replacement of natural turf with synthetic turf. Further, development of new recreational facilities adjacent to existing campuses, or expansion and/or improvement of recreation facilities on existing or expanded school sites would provide, for example via joint-use, a positive impact on the availability of recreational facilities in communities served by schools. No environmental impacts to community recreational facilities would result from development or expansion of schools.

5.16.4 Applicable Regulations and Standard Conditions

State

- California Education Code Section 38131.b: Civic Center Act

5.16.5 Level of Significance Before Mitigation

Upon implementation of Civic Center Act requirements the following impacts would be less than significant: 5.16-1 and 5.16-2.

5.16.6 Mitigation Measures

No mitigation measures are required.

5.16.7 Level of Significance After Mitigation

Impacts would be less than significant.

5. Environmental Analysis

RECREATION

This page intentionally left blank.

5. Environmental Analysis

5.17 TRANSPORTATION AND TRAFFIC

This section of the program EIR evaluates the potential for implementation of the SUP to impact transportation facilities and traffic within the District. This section discusses regulatory framework (plans and policies from several jurisdictional agencies and LAUSD Standard Conditions)~~plans and policies from several jurisdictional agencies and LAUSD standard conditions, guidelines, specifications, practices, policies, and project design features (LAUSD Standards)~~, along with the existing major transportation facilities throughout the SUP area, and possible environmental impacts that may occur as SUP-related site-specific projects are implemented.~~during future phases of the SUP and site specific projects implemented under the SUP.~~ This section also identifies significance thresholds that will be applied during site-specific review and possible mitigation measures that may be employed to avoid or reduce significant impacts.

TERMINOLOGY

Level of Service. Traffic operations of roadway facilities are described as “Level of Service” (LOS). LOS is a qualitative description of traffic flow based on such factors as speed, travel time, delay, and freedom to maneuver. Six levels are defined—from LOS “A”, representing completely free-flow conditions, to LOS “F”, representing breakdown in flow resulting in stop-and-go conditions. LOS “E” represents operations at or near capacity, an unstable level where vehicles are operating with the minimum spacing for maintaining uniform flow. Table 5.17-1 summarizes the volume/capacity (V/C) ranges for LOS “A” through “F”. The V/C ranges are designated in the Los Angeles County Congestion Management Program (CMP) as well as the General Plans for the City of Los Angeles and County of Los Angeles for signalized intersections.

Table 5.17-1 Volume/Capacity and Corresponding Level of Service

LOS	Interpretation	Volume to Capacity Ratio
A	There are no stables that are fully loaded, and few are close to loaded. No approach phase is fully utilized by traffic and no vehicle waits longer than one red indication. Typically, the approach appears quite open, turning movements are easily made, and nearly all drivers find freedom of operation.	0.00 – 0.60
B	Represents stable operation. An occasional approach phase is fully utilized and a substantial number are approaching full use. Many drivers begin to feel somewhat restricted within platoons of vehicles.	0.61 – 0.70
C	Stable operation continues. Full signal cycle loading is still intermittent, but more frequent. Occasional drivers may have to wait through more than one red signal intersection, and backups may develop behind turning vehicles.	0.71 – 0.80
D	Encompasses a zone of increasing restriction approaching instability. Delays to approaching vehicles may be substantial during short peaks with the peak period, but enough cycles with lower demand occur to permit periodic clearance of developing queues, thus preventing excessive backups.	0.81 – 0.90
E	Represents the most vehicles that any particular intersection approach can accommodate. At capacity (V/C = 1.00), there may be long queues of vehicles waiting upstream of the intersection and delays may be great (up to several signal cycles).	0.90 – 1.00
F	Represents jammed conditions. Backups from locations downstream or on the cross street may restrict or prevent movement of vehicles out of the approach under consideration; hence, volumes carried are not predictable. V/C values are highly variable because full utilization of the approach may be prevented by outside conditions.	>1.00

Source: Transportation Research Board. Highway Capacity Manual, 2000.

5. Environmental Analysis TRANSPORTATION AND TRAFFIC

5.17.1 Environmental Setting

5.17.1.1 REGULATORY FRAMEWORK

State and local laws, regulations, plans, and guidelines, ~~along with LAUSD Standards~~ are summarized below. The following regulatory framework discussion does not include all plans and policies that relate to transportation and traffic 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 date when a proposed site-specific school project undergoes review. Therefore, this section provides a general discussion of the most important plans and policies that apply to SUP-related projects. Some of these are not directly applicable to the SUP or site-specific projects implemented under the SUP; however, they are included to assist in identifying potential impacts and significance thresholds. Applicable LAUSD Standard Conditions of Approval are also listed. See *Applicable Regulations and Standard Conditions* at end of this chapter for those that require District compliance.

State

Government Code Sections 65040.2 and 65302

Assembly Bill 1358, the **Complete Streets Act** (Government Code Sections 65040.2 and 65302), was signed into law by Governor Arnold Schwarzenegger in September 2008. As of January 1, 2011, the law requires cities and counties, when updating the part of a local general plan that addresses roadways and traffic flows, to ensure that those plans account for the needs of all roadway users. Specifically, the legislation requires cities and counties to ensure that local roads and streets adequately accommodate the needs of bicyclists, pedestrians and transit riders, as well as motorists. At the same time, the California Department of Transportation (Caltrans) unveiled a revised version of Deputy Directive 64, an internal policy document that now explicitly embraces Complete Streets as the policy covering all phases of state highway projects, from planning to construction to maintenance and repair.

Local

County and City General Plans

The LAUSD is not subject to municipal regulations, such as the county and city general plans. Nevertheless, the District has considered local plans and policies for the communities surrounding its facilities. The boundaries of the LAUSD encompass most of the County of Los Angeles, along with all or portions of 31 cities and unincorporated areas of Los Angeles. For the purpose of this analysis, the City of Los Angeles and the County of Los Angeles traffic regulations are described. If an LAUSD project would affect transportation facilities at any other municipality, consideration would be given to the standards and level of service standards of that municipality.

5. Environmental Analysis TRANSPORTATION AND TRAFFIC

Regulatory Agencies

County of Los Angeles

V/C ranges for LOS “A” through “F” are designated in the Los Angeles County CMP as well as the general plans for the City of Los Angeles and County of Los Angeles for signalized intersections. The Intersection Capacity Utilization (ICU) methodology is the preferred method to calculate the existing and future level of service at intersection, per the Los Angeles County guidelines.¹ According to the county, a project would cause an increase in traffic on a highway that is substantial in relation to the existing traffic load and capacity of the street system if the project would:

- Increase the V/C ratio or ICU by at least one percentage point (0.01) at any location where the final V/C ratio or ICU is 0.91 or greater (LOS E or F).
- Increase the V/C ratio or ICU by at least two percentage points (0.02) at any location where the final V/C ratio or ICU is between 0.81 and 0.90 (LOS D).
- Increase the V/C ratio or ICU by at least four percentage points (0.04) at any location where the final V/C ratio or ICU is between 0.71 and 0.80 (LOS C).

Los Angeles County Metropolitan Transportation Authority

Los Angeles County Metropolitan Transportation Authority (Metro) serves as transportation planner and coordinator, designer, builder, and operator for Los Angeles County. Metro funds improvements to all modes of transportation through several programs, including the Transportation Improvement Program (TIP), the CMP, and Bicycle Transportation Strategic Plan. Metro operates rail and bus transit services throughout Los Angeles County.

Los Angeles County Congestion Management Program

The CMP has been implemented locally by Metro. The CMP involves monitoring traffic conditions and performance measures on the designated transportation network, analyzing the impact of land use decisions on the transportation network, and implementing mitigation measures to reduce impacts on the network. The CMP for Los Angeles County requires that the traffic impact of individual development projects of potentially regional significance be analyzed. A specific system of arterial roadways plus all freeways compose the CMP system. New projects within the County of Los Angeles must comply with the CMP, which was adopted by the Metro pursuant to state law.²

Based on the CMP criteria, the following locations must be analyzed:

¹ County of Los Angeles Department of Public Works, County of Los Angeles Traffic Impact Analysis Report Guidelines (1997), p. 5 and 6.

² Los Angeles County Metropolitan Transportation Authority. Congestion Management Program for Los Angeles County. 2010. http://www.metro.net/projects/congestion_mgmt_pgm/

5. Environmental Analysis TRANSPORTATION AND TRAFFIC

- Mainline freeway monitoring locations where a project will add 150 or more trips, in either direction, during either AM or PM weekday peak hours.
- All CMP arterial monitoring intersections, including freeway on- and off-ramp intersections, where a proposed project will add 50 or more trips during either the AM or PM weekday peak hours (of adjacent street traffic).

Appendix D of the CMP includes Transportation Impact Assessment (TIA) guidelines. It requires a TIA for any project that impacts CMP highways and intersections. If a project does not add, but merely shifts trips at a given monitoring location, a CMP analysis is not required.

A significant impact occurs when a project increases traffic demand on a CMP facility by 2 percent of capacity ($V/C \geq 0.02$), causing LOS F ($V/C > 1.00$); if the facility is already at LOS F, a significant impact occurs when a project increases traffic demand on a CMP facility by 2 percent of capacity ($V/C \geq 0.02$).

City of Los Angeles

The Los Angeles Department of Transportation (LADOT) sets long-term goals for the city’s transportation needs. LADOT is the main agency responsible for the planning, design, construction, and operations of transportation systems in the City of Los Angeles. The LADOT works in conjunction with the city’s planning department to set long-term policies related to the city’s future transportation needs. The City of Los Angeles General Plan contains definitions, goals and objectives, and regulatory requirements for a variety of roadway classifications that make up the city’s roadway system. LADOT has established specific thresholds for project-related increases in the V/C of study intersections, shown in Table 5.17-2. It should be noted that the City of Los Angeles does not have threshold criteria for stop-controlled intersections. Significant impacts at the unsignalized intersections are generally defined by changes in LOS to D or worse due to project-related traffic, plus the results of peak-hour signal warrant analyses.

Table 5.17-2 LADOT Intersection Significance Thresholds

Level of Service	Final V/C Ratio	Project-Related Increase In V/C
C	> 0.701–0.800	equal to or greater than 0.040
D	> 0.801–0.900	equal to or greater than 0.020
E	> 0.901–1.000	equal to or greater than 0.010
F	Greater than 1.000	equal to or greater than 0.010

Source: City of Los Angeles, Department of Transportation. *Traffic Study Policies & Procedures*, June 2013.
http://ladot.lacity.org/stellent/groups/departments/@ladot_contributor/documents/contributor_web_content/lacityp_026875.pdf

5. Environmental Analysis TRANSPORTATION AND TRAFFIC

LAUSD

Standard Conditions of Approval

LAUSD Standards

This table lists transportation and traffic related standard conditions ~~and project design features (PDF)~~ that ~~are~~ will be included as part of each SUP-related project, as appropriate.

PDF Reference #	Topic	Trigger for Compliance	Implementation Phase	Standard Conditions and Project Design Features
Standard Conditions				
SC-T-00 Compliance1	Traffic Analysis for traffic	Increase student capacity by more than 25% or 10 classrooms If project includes increase in student capacity and additional traffic-	Prior to project approval	OEHS CEQA Specification Manual. Appendix C, Traffic and Pedestrian Safety Requirements for New Schools. Requirements identifies performance requirements for the selection and design of school sites to minimize potential pedestrian safety risks: <ul style="list-style-type: none"> • Site Selection • Bus and Passenger Loading Areas • Vehicle Access • Pedestrian Routes to School Requirements also state school traffic studies shall identify measures to ensure separation between pedestrians and vehicles along potential pedestrian routes, such as sidewalks, crosswalks, bike paths, crossing guards, pedestrian and traffic signals, stop signs, warning signs, and other pedestrian access measures.
SC-T-00 Compliance2	Vehicular access-Access and parkingParking	If project includes construction of parking, and/or vehicular or pedestrian access-	During project design	School Design Guide. Vehicular access and parking shall comply with Section 2.3, Vehicular Access and Parking of the School Design Guide, January 2014. The Design Guide contains the following regulations related to traffic: <ul style="list-style-type: none"> • Parking Space Requirements • General Parking Guidelines • Vehicular Access and Pedestrian Safety • Parking Structure Security
Project Design Features				
SC-T-43	Traffic Analysis for traffic	Increase student capacity by more than 25% or 10 classrooms If project increases student capacity and/or generates additional traffic or shifts traffic patterns-	Prior to project approval	Coordinate with the local City or County jurisdiction and agree on the following: <ul style="list-style-type: none"> • Compliance with the jurisdiction's design guidelines for access, parking, and circulation in the vicinity of the project. • Scope of analysis and methodology for the traffic and pedestrian study, including trip generation rates, trip distribution, number and location of intersections to be studied, and traffic impact thresholds. • Implementation of SR2S, traffic control and pedestrian safety devices. • Fair share contribution and/or other mitigation measures for potential traffic impacts. • Traffic and pedestrian safety impact studies shall address local traffic and congestion during morning arrival times, and before and after evening stadium events. • Traffic study will use the latest version of Institute of Transportation Engineer's (ITE) Trip Generation manual to determine trip generation rates (parent vehicles, school buses, staff/faculty vehicles, and delivery vehicles) based on the size of the school facility, unless otherwise required by local jurisdiction.

5. Environmental Analysis

TRANSPORTATION AND TRAFFIC

PDF Reference #	Topic	Trigger for Compliance	Implementation Phase	Standard Conditions and Project Design Features
				<ul style="list-style-type: none"> Loading zones will be analyzed to determine the adequacy as pick-up and drop-off points. Recommendations will be developed in consultation with the local jurisdiction for curb loading bays or curb parking restrictions to accommodate loading needs and will control double parking and across-the-street loading.
SC-T-24	Construction Traffic	Large city project requires construction equipment to use required to use public roadways.	Prior to construction	LAUSD shall require its contractors to submit a construction worksite traffic control plan to the City or County jurisdiction LADOT for review prior to construction. The plan will show the location of any haul routes, hours of operation, protective devices, warning signs, and access to abutting properties. LAUSD shall encourage its contractor to limit construction-related trucks to off-peak commute periods. As required by Caltrans, applicable transportation related safety measures shall be implemented during construction.
SC-AQ-65	Traffic Reduction	Increase student capacity by more than 25% or 10 classrooms if project includes increase in student capacity and additional traffic.	During school operation	LAUSD shall encourage ride-sharing programs for students and teachers.

The most widely recognized source to estimate the amount of trips generated by a land use or project is the Institute of Transportation Engineer's (ITE) *Trip Generation* manual. The ITE manual is a compilation of results from surveys performed at several land use types across the United States. The rates are based on empirical data, which has led to the conclusion that the number of trips generated by school faculty, students, and visitors is based on the number of student seats. The use of this methodology allows total school-related trips to be defined (parent vehicles, school buses, staff/faculty vehicles, and delivery vehicles) based on the size of the school facility. LAUSD currently uses the latest version of the ITE manual.

5.17.1.2 EXISTING CONDITIONS

The boundaries of the LAUSD spread over 720 square miles and include the City of Los Angeles as well as all or parts of 31 smaller municipalities and several unincorporated sections of Los Angeles County. The largest portions of LAUSD fall within the City of Los Angeles and the County of Los Angeles jurisdictions. The area within the LAUSD boundaries is served by a circulation system that facilitates travel by multiple modes, walking, bicycling, public transit, and motor vehicles.

Roadway Network

This circulation system includes an extensive network of freeways, highways, and local streets. Regional access is provided by Interstates 5, 10, 105, 110, 210, 405, and 101. The area has several state highways—1, 2, 47, 60,

5. Environmental Analysis TRANSPORTATION AND TRAFFIC

90, 91, 103, 110, 118, 134, 170, and 187. The area within LAUSD boundaries has several thousand miles of public streets that accommodate a variety of motorized vehicles, including transit vehicles. Most of LAUSD is in the City of Los Angeles. Most roadways are aligned on a grid system providing multiple route options for traveling throughout the area.

Public Transit

The study area is served by multiple transit operators, with networks connecting different communities within and outside of the LAUSD boundaries. The primary transit operator in Los Angeles County is Metro, which provides bus, light rail, and heavy rail (subway) services throughout the county. In addition, LADOT operates local and commuter bus routes, which mainly connect the City of Los Angeles downtown area and the remaining parts of the city. There are also several regional rail and municipal bus operators that provide regional transit services between the City of Los Angeles and municipalities in the outer region.

Metro has two heavy rail lines (i.e., Red and Purple) that operate in a dedicated subway. Metro's four light rail lines (i.e., Blue, Green, Gold, and Expo) use light rail trains that run along rights-of-way, ranging from complete grade separation to at-grade operation in mixed-flow traffic. Metro operates several types of bus service, including the Metro Liner service that operates either in an exclusive right-of-way or along High Occupancy Vehicle (HOV) lanes, and bus routes in mixed traffic on its Rapid, Express, Limited Stop, Local, and Shuttle services. These bus services vary considerably in speed, frequency, and capacity.

There are several other transit operators that provide transit services within LAUSD boundaries. These transit operators include Santa Monica Municipal Bus Lines (Big Blue Bus); Culver City Transit; Orange County Transportation Authority (OCTA); Riverside Transit Agency; OmniTrans, which serves the San Bernardino Valley; Santa Clarita Transit; Gardena Transit; Torrance Transit; and Montebello Bus Lines.³

In addition, commuter rail services in the area are provided by Metrolink and Amtrak. Metrolink covers six counties in Southern California with seven lines. Amtrak also serves communities along the coast in Southern California. Passengers on Metrolink and Amtrak are served by stations in the San Fernando Valley and in downtown Los Angeles at Union Station, from which connecting services are provided by Metro or LADOT.

Bicycle and Pedestrian Facilities

Pedestrians and bicyclists are also important users of the local roadway network. The existing bicycle network is a series of interconnected streets and pathways on which bicycling is encouraged. Pursuant to the California Vehicle Code, bicycles are allowed on any street in the local street system. Designations of Non-Motorized Streets include Class I, Class II, and Class III Bikeways, and Commuter Bikeways.

The majority of the LAUSD area is heavily developed, but development patterns and streetscape conditions vary considerably. Parts of Downtown Los Angeles, Koreatown, Hollywood, and Westwood Village, for example, have a variety of pedestrian-oriented uses fronting the sidewalk. Some residential portions of the San Fernando Valley have narrower street widths and less-connected residential streets than other parts of the City of Los Angeles, while other areas of the Valley are characterized by long blocks fronted by surface

³ Obtained from the City of Los Angeles MP 2035 Draft EIR.

5. Environmental Analysis

TRANSPORTATION AND TRAFFIC

parking lots. Still other parts of the City are characterized by industrial land uses offering little in the way of pedestrian amenities.⁴

School Travel Modes

According to a school survey conducted by the Safe Routes to School National Partnership, compared to the State of California and the nation as a whole, children in Los Angeles County were much more likely to walk to school, likely because the county is urbanized and more children live within walking distance.⁵ In Los Angeles County there are about 1.5 million children aged 5 to 15 and 79 school districts; LAUSD is by far the largest. Over half of these children usually traveled to school in a private vehicle and almost one-third usually walked to school. In Los Angeles County 7.7 percent of school children usually rode in a school bus (in LAUSD this percentage is much lower because busing is only provided for Special Needs students⁶), 3.8 percent used some kind of transit, 1.1 percent reported riding a bike, and another 4 percent did not report how they usually traveled to school or were home schooled (see Table 5.17-3). Although not part of the study, high school students age 16 to 18 are anticipated to have approximately the same travel modes, with possibly more transit riders and private vehicles.

Table 5.17-3 Travel Modes by Students Aged 5 to 15

Usual Mode of Travel to School	National	Statewide	LA County
Private Vehicle	43.6%	53.7%	51.0%
School Bus	37.1%	13.1%	7.7%
Walk	10.7%	24.3%	32.3%
Any Transit ^a	2.1%	2.7%	3.8%
Bike	1.0%	2.0%	1.1%
Travel Mode not Reported ^b	5.5%	4.2%	4.0%

Source: <http://saferoutescalifornia.files.wordpress.com/2012/09/travel-to-school-in-la-county1.pdf>.

Note: sample sizes: 372 reported private vehicle, 139 reported walk, 37 reported school bus, 16 reported transit, and only 5 children in the LA County sample reported biking to school.

^a Any Transit^a includes public and private buses, subway, Metrolink and Amtrak, shuttle bus, and dial-a-ride.

^b Includes home schooled and don't know/refused.

Over 30 percent of school children in Los Angeles County live within 1/2 mile of school (19.4 percent less than 1/4 mile and another 10.7 percent between 1/4 and 1/2 mile), compared to 16.6 percent for the nation as a whole and 27.6 percent for the state—both of which include rural areas where children often live far from

⁴ According to the City of Los Angeles MP 2035 Draft EIR.

⁵ Safe Routes to School National Partnership. Safe Routes to School in California. Travel in Los Angeles County per 2009 National Household Travel Survey. September 24, 2012. http://saferoutescalifornia.org/2012/09/24/19percent_lac/. This is an Analysis Brief summarized from Travel to School in California. Findings from the California - National Household Travel Survey. <http://www.travelbehavior.us/Nancy-pdfs/Travel%20to%20School%20in%20California.pdf>

⁶ Additionally, even at the height of LAUSD busing (2002–2004) when overcrowding required busing students to schools that had seats, only 1.1 percent of students rode the bus (source: Program Environment Impact Report Traffic Impact Study, Meyer, Mohades and Associates, Inc. January 2004). Since then LAUSD has constructed 130 new schools, and busing has been eliminated at all but one school.

5. Environmental Analysis TRANSPORTATION AND TRAFFIC

school. For more detailed discussion on pedestrian and bicycle modes, please refer to Chapter 5.12, *Pedestrian Safety*.

5.17.2 Thresholds of Significance

According to CEQA Guidelines Appendix G, a project would normally have a significant effect on the environment if it would:

- T-1 Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit.
- T-2 Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways.
- T-3 Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks.
- T-4 Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).
- T-5 Result in inadequate emergency access.
- T-6 Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities.

5.17.3 Environmental Impacts

Impacts to pedestrian and bicycle paths are analyzed in Chapter 5.13, *Pedestrian Safety*. The SUP is a program-level action, which must necessarily be evaluated differently than a site-specific project. At this time it is only possible to make generalized estimates of the types of projects that would be implemented under the SUP. The specific location and intensity of the projects throughout the LAUSD is unknown. Therefore, a broader standard for measuring impacts is appropriate for this long-range, program-level impact analysis.

The applicable thresholds are identified in brackets after the impact statement.

5. Environmental Analysis

TRANSPORTATION AND TRAFFIC

Impact 5.17-1: SUP-related trip generation has the potential to impact levels of service on the existing area roadway system. [Threshold T-1]

All SUP Projects

The SUP has the potential to result in increased traffic in the vicinity of school sites. School construction and modernization have the potential to increase traffic or cause a redistribution of traffic if a project increases capacity, changes access locations, or includes a new or expanded stadium or public-use building.

A variety of projects would have the potential to affect the levels of service at transportation facilities—a change in student capacity associated with classroom loading or grade structure, reconfiguration of the school or construction of new classrooms, installation of portable classrooms, or construction of other school facilities that have the potential to generate additional vehicular trips, such as: Performance arts centers

- New or expanded school stadiums or gymnasiums
- Major administrative centers
- Health clinic, parent and family center, or other community uses on existing campus
- Aquatic center or complex

SUP-related project traffic is distributed based on driveway locations and the availability of local roads to access the regional roadway system. For example, a new or relocated school access driveway or drop-off or pickup area could shift traffic to a different street or change vehicle turning movements at key intersections in a way that would adversely affect traffic operations.

Finally, a modification in the time of the day when a school facility generates transportation demand could affect traffic levels of service. For example, without an increase in student capacity, a change in pick-up or drop-off schedule during a new stadium event, closer to the PM peak traffic hour (4:00 PM to 6:00 PM), could add traffic to already congested roadways.

These types of projects could result in changes to the level of service on roadway segments and at intersections. There are no specific projects at this time; however, as specific projects are proposed, a detailed traffic and pedestrian safety assessment would be prepared as part of the environmental review to address potential impacts. The SUP does not include the construction of new stand-alone schools; therefore, a significant increase in traffic is not anticipated.

LAUSD would provide safe and appropriate loading and access areas, ~~in compliance with OEHS CEQA Specification Manual and LAUSD School Design Guide~~ with incorporation of SC-T-1 and SC-T-2.^{7*} As part of each project that increases student capacity and/or generates additional traffic or shifts traffic patterns, LAUSD considers site-specific traffic impacts employing the applicable traffic impact study guidelines from the local jurisdiction. As part of LAUSD ~~PDE-SC-T-34~~, the local jurisdiction traffic department would

⁷ LAUSD OEHS CEQA Specification Manual. December 2005, Revised June 2007. Appendix C, Traffic and Pedestrian Safety Requirements for New Schools.

⁸ School Design Guide. Los Angeles Unified School District. January 2014.

5. Environmental Analysis TRANSPORTATION AND TRAFFIC

determine the scope and methodology used in the traffic and pedestrian safety study. SC-AQ-5 implements ride-sharing to reduce traffic.

This PEIR provides a program-level analysis for the SUP; no site-specific projects have been identified. With implementation of ~~In compliance with~~ LAUSD Standard Conditions, site-specific traffic analysis would include measures to reduce significant traffic impacts. Such measures may include, but are not limited to, fair-share funding and/or installation of traffic signals, intersection and roadway widening and restriping, turn restrictions, and removal of on-street parking.

Even after compliance with local regulations and procedures to evaluate traffic and mitigate impacts, it cannot be guaranteed that feasible measures would be available to mitigate all SUP-related project traffic impacts that could occur. Specifically, trip generation associated with a new stadium or new school construction on an existing campus. These types of project have the potential to impact levels of service on existing roads. Therefore, traffic impacts are considered potentially significant, and may not be feasibly mitigated to a level of insignificance.

Impact 5.17-2: SUP-related trip generation may result in designated road and/or highways exceeding county congestion management agency standards. [Threshold T-2]

The Los Angeles County CMP requires that when an environmental impact report is prepared for a project, traffic and transit impact analysis be conducted for select regional facilities based on the quantity of project traffic expected to use those facilities.⁹ The CMP facilities are major regional access routes such as freeways and arterial roadways. The CMP guidelines require that the first issue to be addressed is the determination of the geographic scope of the study area. The criteria for determining the study area for CMP arterial monitoring intersections and for freeway monitoring locations are:

- If the proposed project adds 50 or more trips on streets adjacent to the CMP intersection during AM or PM peak hours.
- If the proposed project adds 150 or more trips on the freeway, in either direction, during either the AM or PM peak hours.

If a project meets the study area criteria, then the Los Angeles County CMP impact threshold is a project-related traffic increase of 2 percent of capacity ($V/C \geq 0.02$) AND an existing or project-related future LOS F ($V/C > 1.00$).

All SUP Projects

Implementation of the SC-T-1, SC-T-2, SC-T-3 and SC-AQ-5 would encourage ride sharing to reduce reliance on private auto trips, require specific analysis methods to evaluate traffic impacts and implement adequate traffic control devices, and provide adequate site access. Even after compliance with local regulations and

⁹ 2010 Congestion Management Program, Los Angeles County Metropolitan Transportation Authority, adopted October 28, 2010.
http://www.metro.net/projects/congestion_mgmt_pgm/

5. Environmental Analysis

TRANSPORTATION AND TRAFFIC

incorporation of applicable procedures to evaluate potential traffic impacts, it cannot be guaranteed that feasible mitigation would be available to reduce site-specific project-related CMP impacts to less than significant. Trip generation from some SUP-related projects, such as a new charter school or football stadium, may have the potential to impact levels of service for the CMP roadway system. Therefore, CMP roadway impacts are considered potentially significant and may not be feasibly mitigated to a level of insignificance.

Impact 5.17-3: SUP-related trip generation would not impact the existing regional transit system and non-motorized travel system. [Thresholds T-1 and T-6]

All SUP Projects

Regional Transit System

Appendix D.8.4 of the CMP¹⁰ provides methodology for estimating the number of transit trips expected to result from a project based on the projected number of vehicle trips. This methodology assumes an average vehicle ridership (AVR) factor of 1.4 in order to estimate the number of person trips to and from the project and then provides guidance regarding the percentage of person trips assigned to public transit depending on the type of use (commercial/other versus residential) and the proximity to transit services. As shown on Table 5.17-3, the use of public transportation is mostly related to high schools. It is anticipated that the stronger demand occurs in the AM peak hour, as in general school activities end before the PM peak hours. Because a relatively small fraction of students utilize transit, it is not anticipated that SUP-related new construction projects would generate a significant number of riders or cause a substantial impact on the transit system. Impacts would be less than significant.

Nonmotorized Facilities

The LAUSD is located mostly on a mature network of pedestrian facilities. In the vicinity of schools, pedestrian safety features are usually present, including sidewalks, crosswalks, signage, and crossing guards. Prior to development of school facilities, the LAUSD implements Caltrans' "Safe Routes to School," where specific measures based on the particular conditions for each site are identified to ensure separation between vehicles and pedestrians thru designated pedestrian routes and bike paths. Pedestrian routes are implemented via designation of sidewalks, crosswalks, crossing guards, pedestrian and traffic signals, stop signs, warning signs, and other pedestrian measures. LAUSD encourages ride-sharing programs for students and teachers. Also, students that travel to school may walk or ride bikes; therefore, the SUP would not conflict with policies, plans, or programs for nonmotorized transportation modes. Implementation of the SUP would not result in a significant impact to pedestrian and bicycle systems.

¹⁰ Los Angeles County Metropolitan Transportation Authority. Congestion Management Program for Los Angeles County. 2010. http://www.metro.net/projects/congestion_mgmt_pgm/.

5. Environmental Analysis TRANSPORTATION AND TRAFFIC

Impact 5.17-4: SUP-related circulation improvements would not create potentially hazardous conditions (sharp curves, etc.), incompatible uses, or inadequate emergency access. [Thresholds T-4 and T-5]

All SUP Projects

As individual projects are proposed and implemented, design development would include the use of standard engineering practices such as standard driveway widths and turning radii and, provision of adequate line of sight to avoid design elements that could result in hazards. “Sight Distance Standards” from the Caltrans Highway Design Manual relate minimum sight distance values to a range of design speeds.¹¹ Vehicular access and parking shall comply with Section 2.3, Vehicular access and parking, of the School Design Guide. In addition, projects are required to accommodate ingress and egress of emergency vehicles, as required by the affected jurisdiction where the individual project would be implemented. All access features are subject to and must satisfy the fire department at the affected jurisdiction.

LAUSD coordinates with LADOT while selecting locations and has specifications for provision of adequate access, parking, and circulation in the vicinity of a school site.¹² These specifications require that the District:

- Locate schools on secondary highways or collector streets, not on major highways.
- Locate entrances to the school buildings or grounds as close as possible to a pedestrian route to school, or on a minor street near an intersection, or at an existing signalized crosswalk.
- Provide adequate loading areas close to school entry points, and eliminate the need for double-parking
- Provide adequate space for school bus loading and unloading with curb cuts.
- Provide street dedications and improvements, including required traffic control signals, along school site frontage in accordance with state and city standards.
- Prepare a preliminary “Pedestrian Routes to School” map to be completed for the ¼-mile radius or the proposed school’s attendance area, whichever is less.
- Inventory the pedestrian system (including existing sidewalks, crosswalks, and other pedestrian elements) within ¼ mile of a proposed school site and identify necessary safe routes for providing access to and from school.
- Identify potential safety concerns for pedestrian access.

¹¹ Highway Design Manual, California Transportation Department, May 7, 2012.

¹² LAUSD OEHS CEQA Specification Manual. December 2005, revised June 2007. Appendix C, Traffic and Pedestrian Safety Requirements for New Schools.

5. Environmental Analysis

TRANSPORTATION AND TRAFFIC

- LADOT will engineer pedestrian route maps identifying controlled intersections and recommended pedestrian routes.
- LAUSD shall coordinate with LADOT the installation of traffic controls, school warning and speed limit signs, school crosswalks, and pavement markings.

In addition, as stated previously, projects are required to accommodate ingress and egress of emergency vehicles. All access features are subject to and must satisfy the fire department at the affected jurisdiction. New construction and modernization projects would conform to local ordinances to ensure that adequate emergency access is provided. Impacts would be less than significant.

Impact 5.17-5: SUP-related projects would not result in a change in air traffic patterns or change in location that would result in substantial safety risks. [Threshold T-3]

New Construction on New Property or Existing Campus

SUP-related construction and modernization projects may occur within the vicinity of an existing airport, including LAX, Van Nuys Airport, Whiteman Airport, Bob Hope Airport, or Santa Monica Airport. There are only a few schools located within the flight path of an airport (specifically, LAX, Van Nuys, and Bob Hope Airports (see Figure 5.12-1, *Airport Noise*). About 15 out of 1,309 existing schools are within the geographic area of an ALUP; therefore very few new construction projects would occur under the flight path of an airport. Per Education Code Section 17215, the District must receive approval from the CDE and Caltrans, or DOT before acquiring title to property for a school site if the proposed site is within two nautical miles of an airport runway. As part of the SUP, property may be acquired directly adjacent to existing schools to accommodate new buildings. The consideration of a proposed site in relation to airports is part of the District's CCR Title 5 and CEQA site review procedures.

According to CDE regulations,¹³ the responsibilities of the school district, the California Department of Education, and the Caltrans, Aeronautics Program, Office of Airports, concerning the school site's proximity to runways are contained in *Education Code* Section 17215.^{14,15} As a part of the site selection prescreening process, the school district should determine the proximity of the site to runways. If the site is within two nautical miles of an existing airport runway or a potential runway included in an airport master plan, as measured by direct air line from the part of the runway that is nearest to a proposed school site, the following procedures must be followed before the site can be approved:

1. The governing board of the school district, including any district governed by a city board of education, shall give the Department written notice of the proposed acquisition and shall submit any information that is required by the Department. The Department will notify the DOT Aeronautics Program, Office of Airports.

¹³ School Site Selection and Approval Guide. <http://www.cde.ca.gov/ls/fa/sf/schoolsiteguide.asp#Noise>

¹⁴ CCR, Title 5, Section 14011(k)

¹⁵ As amended by Assembly Bill (AB) 747, Chapter 837, Statutes of 1999.

5. Environmental Analysis TRANSPORTATION AND TRAFFIC

2. The Division of Aeronautics shall investigate the proposed site and, within 30 working days after receipt of the notice, shall submit to the local governing board a written report and its recommendations concerning acquisition of the site. As a part of the investigation, the Aeronautics Program shall give notice to the owner and operator of the airport, who shall be granted the opportunity to comment on the proposed school site.
3. The governing board of the school district shall not acquire title to the property until the report of the DOT Aeronautics Program has been received. If the report favors the acquisition of the property for a school site or an addition to a present school site, the governing board shall hold a public hearing on the matter before acquiring the site.
4. If the report does not favor the acquisition of the property for a school site or an addition to a present school site, the governing board may not acquire title to the property. If the report does not favor acquisition of a proposed site, no state funds or local funds shall be apportioned or expended for the acquisition of that site, construction of any school building on that site, or the expansion of any existing site to include that site.
5. The requirements noted above do not apply to sites acquired before January 1, 1966, or to any additions or extensions to those sites.

By following these procedures and state regulations, the LAUSD would not acquire title of a property that would conflict with findings of the DOT Aeronautics Program, which includes regulations that ensure safety. Therefore, impacts associated with airport safety would be less than significant.

5.17.4 Applicable Regulations and Standard Conditions

State

- Education Code Section 17215: notification and review by California Department of Transportation, Aeronautics Program, Office of Airports
- American with Disabilities Act (ADA)
- AB 1358, Complete Streets Act
- California Vehicle Code (CVC)

Local

- Los Angeles County Metropolitan Transportation Authority Congestion Management Plan
- Jurisdictional municipal codes, vehicular and traffic regulations
- Jurisdictional general plan circulation element or related policies

5. Environmental Analysis TRANSPORTATION AND TRAFFIC

LAUSD Standard Conditions of Approval

- ~~LAUSD-SC-T-1 through SC-T-4~~
- ~~SC-AQ-5 OEHS CEQA Specification Manual, December 2005, Revised June 2007, Appendix C, Traffic and Pedestrian Safety Requirements for New Schools.~~
- ~~School Design Guide, Los Angeles Unified School District, January 2014.~~
- Project Design Features: PDF T-1, PDF T-2 and PDF AQ-6

5.17.5 Level of Significance Before Mitigation

Upon implementation of regulatory requirements and LAUSD Standard Conditions listed above, the following impacts would be less than significant: 5.17-3, 5.17-4, 5.17-5, and 5.17-6.

Even with implementation of regulatory requirements and LAUSD Standard Conditions the following impacts would be **potentially significant**:

- **Impact 5.17-1** The SUP-related projects may generate vehicular traffic that impact levels of service for the roadway system.
- **Impact 5.17-2** The SUP-related projects may impact levels of service at CMP facilities.

5.17.6 Mitigation Measures

Impact 5.17-1

No additional mitigation measures would ensure that traffic impacts would be reduced to less than significant.

Impact 5.17-2

No additional mitigation measures would ensure that Los Angeles County Congestion Management Program impacts would be reduced to less than significant.

5.17.7 Level of Significance After Mitigation

Impact 5.17-1

Traffic impacts may occur for some projects associated with the SUP. Implementation of ~~the LAUSD OEHS CEQA Specification Manual, School Design Guide, and PDFs SC-T-1, SC-T-2, SC-T-3 and SC-AQ-6-5~~ would encourage ride sharing to reduce reliance on private auto trips, require specific analysis methods to evaluate traffic impacts and implement adequate traffic control devices, and provide adequate site access. Possible mitigation measures to offset vehicular impacts to the roadway system could include installation of traffic signals, intersection and roadway widening and restriping, turn restrictions, and removal of on-street parking. However, it may be infeasible to implement ~~mitigation other~~ measures to reduce potential impacts

5. Environmental Analysis TRANSPORTATION AND TRAFFIC

from future projects to the roadway system. ~~No additional mitigation measures are available to reduce impacts.~~ Therefore, Impact 5.17-1 would remain significant and unavoidable.

Impact 5.17-2

Traffic impacts may occur for some projects associated with the SUP. Implementation of ~~LAUSD SC-T-1, SC-T-2, SC-T-3 and SC-AQ-5~~ OEHS CEQA Specification Manual, School Design Guide, and PDFs T-1 and AQ-6 would encourage ride sharing to reduce reliance on private auto trips, require specific analysis methods to evaluate traffic impacts and implement adequate traffic control devices, and provide adequate site access. Possible mitigation measures to offset vehicular impacts to the CMP system could include intersection and roadway widening and restriping and turn restrictions. However, it may be infeasible to implement ~~mitigation other~~ measures to reduce potential impacts to the CMP from future projects system. ~~No additional mitigation measures are available to reduce impacts.~~ Therefore, Impact 5.17-2 would remain significant and unavoidable.

5. Environmental Analysis TRANSPORTATION AND TRAFFIC

This page intentionally left blank.

5. Environmental Analysis

5.18 UTILITIES AND SERVICE SYSTEMS

This section of the program EIR evaluates the potential for implementation of the SUP to impact public utilities and service systems in the District. This section discusses regulatory framework (plans and policies from several jurisdictional agencies and LAUSD Standard Conditions)~~plans and policies from several jurisdictional agencies and LAUSD standard conditions, guidelines, specifications, practices, policies, and project design features (LAUSD Standards)~~, along with the existing utilities and drainage conditions throughout the SUP area, and possible environmental impacts that may occur as SUP-related site-specific projects are implemented~~during future phases of the SUP and site specific projects implemented under the SUP~~.

TERMINOLOGY

Terms in *italics* are other entries in this section.

Acre-Feet (af). An **acre-foot** is a unit of volume—approximately 325,851 gallons—commonly used in the United States in reference to large-scale water resources, such as reservoirs, aqueducts, canals, sewer flow capacity, and river flows.

Acre-Foot per Year (afy): A flow rate used to measure water and wastewater flows; one acre-foot per year is approximately 892.2 gallons per day or 0.62 gallons per minute.

Megawatt (MW): one million watts.

Catch Basin: a basin underneath a storm drain inlet designed to remove some pollutants, including trash and sediment.

Debris Basin: a basin impounded by a dam and designed to catch debris flowing down a waterway during flood flows.

Gigawatt (GW): one billion watts

Primary [Wastewater] Treatment: Removal of solids using settling tanks.

Recycled Water: *Tertiary-treated wastewater* used for nonpotable uses such as landscape irrigation, industrial uses, and groundwater recharge.

Secondary [Wastewater] Treatment: Reduction of organic matter using bacteria and oxygen; followed by further removal of solids.

Tertiary [Wastewater] Treatment: filtration of wastewater to remove any solids remaining after the first two phases of treatment.

Volatile Organic Compounds (VOC): hydrocarbons and hydrocarbon compounds containing chlorine, bromine, and/or fluorine, that evaporate readily.

5. Environmental Analysis UTILITIES AND SERVICE SYSTEMS

5.18.1 Environmental Setting

5.18.1.1 REGULATORY FRAMEWORK

State, regional and local laws, regulations, plans, and guidelines are summarized below. The following regulatory framework discussion does not include all plans and policies that relate to utilities and service systems 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 date when a proposed site-specific school project undergoes review. Therefore, this section provides a general discussion of the most important plans and policies that apply to SUP-related projects. Although some of these may not directly applicable to the SUP or site-specific projects implemented under the SUP, they are included to assist in identifying potential impacts and significance thresholds. Applicable LAUSD Standards Conditions of Approval are also listed. See *Applicable Regulations and Standard Conditions* at end of this chapter for those that require District compliance.

Water

State

California Water Code Sections 10608 et seq.: The Water Conservation Act of 2009

Senate Bill X7-7 (SB X7-7), the Water Conservation Act of 2009, requires all water suppliers to increase water use efficiency.¹ The **20x2020 Water Conservation Plan**, issued by the Department of Water Resources (DWR) in 2010 pursuant to the Water Conservation Act of 2009, established a water conservation target of 20 percent reduction in water use by 2020 compared to 2005 baseline use. SB X7-7 established requirements for urban water conservation and agricultural water conservation; provisions for urban water conservation are summarized below.

Urban Water Conservation. The legislation sets an overall goal of reducing per capita urban water use by 20% by December 31, 2020. The state shall make incremental progress towards this goal by reducing per capita water use by at least 10% by December 31, 2015.

- Each urban retail water supplier shall develop water use targets and an interim water use target by July 1, 2011.
- An urban retail water supplier shall include in its water management plan due July 2011 the baseline daily per capita water use, water use target, interim water use target, and compliance daily per capita water use. The Department of Water Resources, through a public process and in consultation with the California Urban Water Conservation Council, shall develop technical methodologies and criteria for the consistent implementation of this part.
- The Department of Water Resources shall adopt regulations for implementation of the provisions relating to process water.

¹ <http://www.water.ca.gov/wateruseefficiency/sb7/>.

5. Environmental Analysis UTILITIES AND SERVICE SYSTEM

- A Commercial, Institutional, Industrial (CII) task force is to be established that will develop and implement urban best management practices for statewide water savings.
- Effective 2016, urban retail water suppliers who do not meet the water conservation requirements established by this bill are not eligible for state water grants or loans.

Governor's Drought Declaration

California Governor Edmund Brown Jr. declared a drought state of emergency on January 17, 2014, asking Californians to reduce water use by 20 percent.² The US Department of Agriculture designated 27 California counties, including Los Angeles County, as primary natural disaster areas on January 15, 2014, due to the drought.³ Average annual rainfall at the Los Angeles Civic Center is 14.41 inches, but ~~has only the Civic Center~~ received 5.93 inches of rainfall between October 2012 and September 2013, that is, 41 percent of the average ~~during the 2012-2013 water year. Rainfall at the Civic Center between October 2013 and January 2014 was 0.88 inches, only 12 percent of average.~~⁴ On April 1, 2015 the Governor issued an executive order for the first ever statewide mandatory water reductions. The order includes mandates to save water, increase enforcement, streamline government response, and invest in new technologies. ~~The DWR announced on January 31, 2014, that if current dry conditions persist, customers would receive no deliveries from the State Water Project in 2014, except for small carryover amounts from 2013. Deliveries to agricultural districts with long standing water rights in the Sacramento Valley may be cut 50 percent—the maximum permitted by contract—depending on future snow survey results. Almost all areas served by the SWP have other sources of water, such as groundwater and local reservoirs.~~⁵

Wastewater

Federal

Wastewater treatment before effluent is discharged to Waters of the United States is required by the federal Clean Water Act, United States Code, Title 33, Sections 1251 et seq.⁶

Solid Waste

State

Integrated Solid Waste Management Act of 1989. Public Resources Code 40050 et seq. (Assembly Bill 939) (California Department of Resources Recycling and Recovery (CalRecycle)) established an integrated waste-management system that focused on source reduction, recycling, composting, and land disposal of

² Office of Governor Edmund G. Brown Jr. 2014, January 17. Governor Brown Declares Drought State of Emergency. <http://gov.ca.gov/news.php?id=18368>.

³ US Department of Agriculture Farm Services Agency (USDA). 2014, January 15. USDA Designates 27 Counties in California as Primary Natural Disaster Areas. http://www.fsa.usda.gov/FSA/newsReleases?area=newsroom&subject=landing&topic=edn&newstype=ednewsrel&type=detail&item=ed_20140115_rel_0007.html.

⁴ California Department of Water Resources California Data Exchange Center (DWR). 2014, February 5. Hydrologic Conditions in California (01/01/2014). <http://cdec.water.ca.gov/cgi-progs/reports/EXECSUM>.

⁵ California Department of Water Resources (DWR). 2014, January 31. DWR Drops State Water Project Allocation to Zero, Seeks to Preserve Remaining Supplies. <http://www.water.ca.gov/news/newsreleases/2014/013114pressrelease.pdf>.

⁶ The federal Clean Water Act is described in further detail in Section 5.9, *Hydrology and Water Quality*, of this DEIR.

5. Environmental Analysis

UTILITIES AND SERVICE SYSTEMS

waste. AB 939 required every California city and county to divert 50 percent of its waste from landfills by the year 2000. Compliance with AB 939 is measured in part by comparing solid waste disposal rates for a jurisdiction with target disposal rates; actual rates at or below target rates are consistent with AB 939. AB 939 also requires California counties to show 15 years of disposal capacity for all jurisdictions in the county or show a plan to transform or divert its waste.

Assembly Bill 341 (Chesbro, Chapter 476, Statutes of 2011) increased the statewide solid waste diversion goal to 75 percent by 2020.⁷ The law also mandates recycling for commercial and multifamily residential land uses as well as schools and school districts.

Mandatory Commercial Recycling (California Code of Regulations, Title 14, Division 7, Chapter 9.1, Section 18835 – 18839). The Office of Administrative Law (OAL) approved the mandatory commercial regulation on May 7, 2012 and it became effective immediately. On June 27, 2012 the Governor signed Senate Bill 1018 which included an amendment that requires a business (including schools) that generates 4 cubic yards or more of commercial solid waste per week to arrange for recycling services.

California Green Building Standards Code (California Code of Regulations, Title 24, Part 11, Section 5.408) requires that at least 50 percent of the nonhazardous construction and demolition waste from nonresidential construction operations be recycled and/or salvaged for reuse.⁸

Electricity and Natural Gas

California Green Building Standards Code

The 2013 California Green Building Standards Code (CALGreen), California Code of Regulations, Title 24, Part 11, took effect January 1, 2014.

Collaborative for High Performance Schools

The “Collaborative for High Performance Schools” (CHPS) is a school design standards-setting organization associated with the “Leadership in Energy and Environmental Design” (LEED) group. The District requires that CHPS criteria be incorporated to the extent feasible into its school construction program. ~~CHPS and CHPS criteria are discussed further in Appendix B of this DEIR.~~

California Public Utilities Commission

Established in 1911, the California Public Utilities Commission (CPUC) regulates privately owned electric, natural gas, telecommunications, water, railroad, rail transit, and passenger transportation companies. The commission is organized into several advisory units, an enforcement division, and a strategic planning group. Electricity and natural gas companies are both regulated by the CPUC.

⁷ AB 341 added and amended multiple sections of the California Public Resources Code.

⁸ International Code Council (ICC). 2014, March 18. California Green Building Standards Code California Code of Regulations, Title 24, Part 11 (CALGreen). http://www.ecodes.biz/ecodes_support/free_resources/2013California/13Green/PDFs/Chapter%205%20-%20Nonresidential%20Mandatory%20Measures.pdf.

5. Environmental Analysis UTILITIES AND SERVICE SYSTEM

Regulation of Municipal Utilities

The Los Angeles Department of Water and Power is regulated by the City of Los Angeles Board of Water and Power Commissioners. Municipal utilities are not regulated by the CPUC.

LAUSD

Standard Conditions of Approval

Reference PDF #	Topic	Trigger for Compliance	Implementation Phase	Standard Conditions and Project Design Feature
Standard Conditions				
SC-USS-1	Solid Waste (construction)	Generate construction and/or demolition debris	Prior to start and during construction	<p><u>School Design Guide.</u> Construction and demolition waste shall be recycled to the maximum extent feasible. LAUSD has established a minimum non-hazardous construction and demolition debris recycling requirement of 75% by weight as defined in Specification 01340, Construction & Demolition Waste Management.</p> <p><u>Guide Specifications 2004 - Section 01340, Construction & Demolition Waste Management.</u> This section of the LAUSD Specifications includes procedures for preparation and implementation, including reporting and documentation, of a Waste Management Plan for reusing, recycling, salvage or disposal of non-hazardous waste materials generated during demolition and/or new construction (Construction & Demolition (C&D) Waste), to foster material recovery and re-use and to minimize disposal in landfills. Requires the collection and separation of all C&D waste materials generated on-site, reuse or recycling on-site, transportation to approved recyclers or reuse organizations, or transportation to legally designated landfills, for the purpose of recycling salvaging and/or reusing a minimum of 75% of the C&D waste generated.</p>
Project Design Features				
SC-USS-42	Water Supply	If project involves excavation near water lines	During construction	LAUSD shall coordinate with the City of Los Angeles Department of Water and Power or other appropriate jurisdiction and department prior to the relocation or upgrade of any water facilities to reduce the potential for disruptions in service.
USS-2	Solid Waste	If new school is constructed on existing campus	Prior to occupation	The building/school shall meet local ordinance requirements for recycling space. Areas without local ordinances should use the model ordinance developed by the California Integrated Waste Management Board
SC-USS-33	Solid Waste (operation)	New school or new school construction on existing campus if new school is constructed on existing campus	During operation	Provide easily accessible area serving the entire school that are dedicated to the collection and storage of materials for recycling including (at a minimum) paper, cardboard, glass, plastics, metals and landscaping waste. There shall be at least one centralized collection point (loading dock), and ability for separation of recyclables where waste is disposed of for classrooms and common areas such as cafeteria's, gyms or multi-purpose rooms.
SC-GHG-1	Water use and efficiency	If project include work on water	During school operation	During school operation, LAUSD shall perform regular preventative maintenance on pumps, valves, piping, and tanks to minimize water

5. Environmental Analysis UTILITIES AND SERVICE SYSTEMS

Reference PDF #	Topic	Trigger for Compliance	Implementation Phase	Standard Conditions and Project Design Feature
	<u>Efficiency</u>	pumps, valves, piping, and/or tanks-		loss.
SC-GHG-2	Water use - <u>Use and efficiency</u> <u>Efficiency</u>	If projects involve W-work on landscape irrigation system-	Prior to full operation of irrigation system	LAUSD shall utilize set automatic sprinklers set to irrigate landscaping during the early morning (overhead and drip) and evening (drip only) hours to reduce water loss from evaporation.
SC-GHG-3	Water use - <u>Use and efficiency</u> <u>Efficiency</u>	If projects involve W-work on landscape irrigation system-	Prior to full operation of irrigation system	LAUSD shall reset automatic sprinkler timers to water less during cooler months and during the rainy season.
SC-GHG-4	Water use - <u>Use and efficiency</u> <u>Efficiency</u>	If projects involve W-work on landscape and/or irrigation system.	Prior to full operation of irrigation system	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	Energy <u>efficiency</u> <u>Efficiency</u>	If project involves a B building construction	Prior to occupancy	LAUSD shall ensure that the time dependent valued energy of the proposed project design is at least 10 percent, with a goal of 20 percent less than a standard design that is in minimum compliance with the California Title 24, Part 6 energy efficiency standards that are in force at the time the project is submitted to the Division of the State Architect.
USS-1	Water Supply	If project involves excavation near water lines	During construction	LAUSD shall coordinate with the City of Los Angeles Department of Water and Power or other appropriate jurisdiction and department prior to the relocation or upgrade of any water facilities to reduce the potential for disruptions in service.

5.18.1.2 WATER PROVISION

Water Providers

Water providers by jurisdiction in the LAUSD are listed in Table 5.18-1.

Table 5.18-1 Water Providers

Educational Service Center/Local District	City Jurisdiction	Water Provider
Portions of Northeast, West, East, and South; all of Northwest and Central	City of Los Angeles ⁹	City of Los Angeles Department of Water and Power

⁹ City of Los Angeles Department of Water and Power. 2014, February 3. Water. https://www.ladwp.com/ladwp/faces/wcnav_externalId/a-w-wqalty?_afLoop=13625197479935&_afWindowMode=0&_afWindowId=5xqwf3y1_35#%40%3F_afWindowId%3D5xqwf3y1_35%26_afLoop%3D13625197479935%26_afWindowMode%3D0%26_adf.ctrl-state%3D5xqwf3y1_63.

5. Environmental Analysis
UTILITIES AND SERVICE SYSTEM

Table 5.18-1 Water Providers

<u>Educational Service Center/Local District</u>	<u>City/Jurisdiction</u>	<u>Water Provider</u>
<u>Northeast</u>	San Fernando ¹⁰	City of San Fernando Water Department
West	West Hollywood ¹¹	City of Los Angeles Department of Water and Power City of Beverly Hills Public Works Services Department
	<u>Unincorporated Los Angeles County (Unincorporated):</u> Marina Del Rey	Los Angeles County Waterworks District 29
East	<u>Bell¹²Los Angeles County (Unincorporated):</u> East Los Angeles	<u>California Water Company</u> <u>Golden State Water Company</u> <u>Maywood Mutual Water Company</u> <u>Tract 349 Water Company</u> <u>Tract 180 Water Company</u> <u>California Water Service Company</u>
	<u>Cudahy¹³</u>	<u>Cudahy Water Utility</u>
	<u>Huntington Park¹⁴</u>	<u>City of Huntington Park Water & Sewer Division</u>
	<u>Maywood¹⁵</u>	<u>Maywood Mutual Water Co. No. 1</u> <u>Maywood Mutual Water Co. No. 2</u> <u>Maywood Mutual Water Co. No. 3</u>
	<u>South Gate¹⁶</u>	<u>City of South Gate Water Division</u> <u>Golden State Water Company</u>
	<u>Unincorporated Los Angeles County: (Unincorporated):</u> <u>East Los Angeles</u>	<u>California Water Service Company</u>
South	<u>Carson¹⁷Bell¹⁸</u>	<u>California Water Service Company</u> <u>Golden State Water Company</u> <u>California Water Company</u> <u>Golden State Water Company</u> <u>Maywood Mutual Water Company</u> <u>Tract 349 Water Company</u> <u>Tract 180 Water Company</u>
	<u>Cudahy¹⁹Carson²⁰</u>	<u>Cudahy Water Utility</u> <u>California Water Service Company</u> <u>Golden State Water Company</u>
	<u>Gardena²¹Cudahy²²</u>	<u>Golden State Water Company</u> <u>Cudahy Water Utility</u>

¹⁰ City of San Fernando. 2014, February 3. Water Department. http://www.ci.sanfernando.ca.us/city_government/departments/pubworks/divisions/water.shtml.

¹¹ City of West Hollywood. 2014, February 3. Water Conservation. <http://www.weho.org/city-hall/city-departments/public-works/environmental-services/water-conservation>.

¹² City of Bell. 2014, February 3. Utility Providers. <http://www.cityofbell.org/?navid=271>.

¹³ City of Cudahy. 2014, February 3. Cudahy Water Utility. <http://www.cudahy-wi.gov/cudahy/residents/water+and+sewer/default.asp>.

¹⁴ City of Huntington Park. 2014, February 3. Water & Sewer Division. <http://www.huntingtonpark.org/index.aspx?nid=76>.

¹⁵ City of Maywood. 2014, February 3. Utilities. http://www.cityofmaywood.com/index.php?option=com_content&view=article&id=59&Itemid=87.

¹⁶ City of South Gate. 2014, February 3. Water/Sewer Service. <http://www.sogate.org/index.cfm/fuseaction/nav/navid/71/>.

¹⁷ City of Carson. 2014, February 3. Utilities. <http://ci.carson.ca.us/content/department/utilities.asp>.

¹⁸ City of Bell. 2014, February 3. Utility Providers. <http://www.cityofbell.org/?navid=271>.

¹⁹ City of Cudahy. 2014, February 3. Cudahy Water Utility. <http://www.cudahy-wi.gov/cudahy/residents/water+and+sewer/default.asp>.

²⁰ City of Carson. 2014, February 3. Utilities. <http://ci.carson.ca.us/content/department/utilities.asp>.

²¹ City of Gardena. 2014, February 3. Utility Providers. <http://www.ci.gardena.ca.us/departments/PublicWorks/utilityproviders.html>.

5. Environmental Analysis UTILITIES AND SERVICE SYSTEMS

Table 5.18-1 Water Providers

Educational Service Center/Local District	City/Jurisdiction	Water Provider
	<u>Huntington Park</u> ²³ <u>Gardena</u> ²⁴	<u>City of Huntington Park Water & Sewer Division</u> <u>Golden State Water Company</u>
	<u>Lomita</u> ²⁵ <u>Huntington Park</u> ²⁶	<u>City of Lomita Water Department</u> <u>City of Huntington Park Water & Sewer Division</u>
	<u>Maywood</u> ²⁷ <u>Lomita</u> ²⁸	<u>Maywood Mutual Water Co. No. 1</u> <u>Maywood Mutual Water Co. No. 2</u> <u>Maywood Mutual Water Co. No. 3</u> <u>City of Lomita Water Department</u>
	<u>South Gate</u> ²⁹ <u>Maywood</u> ³⁰	<u>City of South Gate Water Division</u> <u>Golden State Water Company</u> <u>Maywood Mutual Water Co. No. 1</u> <u>Maywood Mutual Water Co. No. 2</u> <u>Maywood Mutual Water Co. No. 3</u>
Unincorporated Los Angeles County (Unincorporated) ³¹ South Gate ³² Los Angeles County (Unincorporated) ³³	<u>Willowbrook</u> <u>West Carson</u>	<u>Golden State Water Company</u> <u>West Carson</u> <u>City of South Gate Water Division</u> <u>Golden State Water Company</u> <u>Los Angeles County Waterworks District 29</u>
	<u>Florence-Graham</u> <u>Willowbrook</u>	<u>Sativa Los Angeles County Water District</u> <u>Park Water Company</u> <u>Southern California Water Company</u>
	<u>West Rancho Dominguez</u>	<u>Golden State Water Company</u> <u>Los Angeles County Waterworks District 29</u> <u>Los Angeles County Waterworks District 29</u>
	<u>West Carson</u> <u>Florence-Graham</u>	<u>California Water Service Company</u>

Sources: See footnotes for each city.

²² City of Cudahy. 2014, February 3. Cudahy Water Utility. <http://www.cudahy-wi.gov/cudahy/residents/water+and+sewer/default.asp>.

²³ City of Huntington Park. 2014, February 3. Water & Sewer Division. <http://www.huntingtonpark.org/index.aspx?nid=76>.

²⁴ City of Gardena. 2014, February 3. Utility Providers. <http://www.ci.gardena.ca.us/departments/PublicWorks/utilityproviders.html>.

²⁵ City of Lomita. 2014, February 3. Water Department. <http://www.lomita.com/cityhall/citygov/water/index.html>.

²⁶ City of Huntington Park. 2014, February 3. Water & Sewer Division. <http://www.huntingtonpark.org/index.aspx?nid=76>.

²⁷ City of Maywood. 2014, February 3. Utilities. http://www.cityofmaywood.com/index.php?option=com_content&view=article&id=59&Itemid=87.

²⁸ City of Lomita. 2014, February 3. Water Department. <http://www.lomita.com/cityhall/citygov/water/index.html>.

²⁹ City of South Gate. 2014, February 3. Water/Sewer Service. <http://www.sogate.org/index.cfm/fuseaction/nav/navid/71/>.

³⁰ City of Maywood. 2014, February 3. Utilities. http://www.cityofmaywood.com/index.php?option=com_content&view=article&id=59&Itemid=87.

³¹ Los Angeles County Waterworks Districts. 2014, February 3. Los Angeles County Waterworks Districts. <http://dpw.lacounty.gov/wwd/web/>.

³² City of South Gate. 2014, February 3. Water/Sewer Service. <http://www.sogate.org/index.cfm/fuseaction/nav/navid/71/>.

³³ Los Angeles County Waterworks Districts. 2014, February 3. Los Angeles County Waterworks Districts. <http://dpw.lacounty.gov/wwd/web/>.

5. Environmental Analysis UTILITIES AND SERVICE SYSTEM

5.18.1.3 EXISTING CONDITIONS

Water Supplies

Types of Water Sources

Water agencies supplying the District have four types of water supply sources:

- **Imported Water**
 - **From Northern California via the State Water Project.** The delivery capacity of the State Water Project is currently 2.4 million acre-feet annually. The State Water Project has delivered water to 29 water agencies along the route, including the Antelope Valley-East Kern Water Agency, Castaic Lake Water Agency, Metropolitan Water District, and the San Gabriel Valley Municipal Water District. The Metropolitan Water District of Southern California (MWD) wholesales most of the water imported into Southern California by the State Water Project to the MWD's 26 member agencies.
 - **From the Colorado River via the Colorado River Aqueduct:** The 242-mile long Colorado River Aqueduct carries a billion gallons (2,778 acre-feet) of water daily to Southern California. Los Angeles County relies on the Colorado River Aqueduct for some of its water supply. California, along with a number of other states, shares water that is diverted from the Colorado River. Over the past few decades, California has been utilizing more than its allocation of 4.4 million acre-feet of water annually from the Colorado River. Water agencies throughout California, including the Metropolitan Water District, are implementing programs to reduce water drawn from this source to the initial allocation agreement, through water banking, conservation, and recycling. Sold by the MWD to its member agencies.
 - **From the Owens Valley and eastern Sierra Nevada via the Los Angeles Aqueduct:** the 233-mile-long Los Angeles Aqueduct conveys water from the eastern Sierra Nevada and Owens Valley to the City of Los Angeles. Deliveries between July 2009 and June 2010, the latest period for which data are available, were 200,000 acre-feet, or about 65 billion gallons.³⁴
- **Groundwater from local groundwater basins.** Groundwater basins are recharged naturally through stormwater and rainfall, and artificially recharged in recharging basins with imported water, stormwater, and recycled water.
- **Recycled Water:** treated and disinfected municipal wastewater. Uses include landscape and agricultural irrigation, groundwater recharge, and industrial uses
- Desalination of ocean water

³⁴ City of Los Angeles Department of Water and Power (LADWP). Adopted May 3, 2011. Urban Water Management Plan. http://www.water.ca.gov/urbanwatermanagement/2010uwmps/Los%20Angeles%20Department%20of%20Water%20and%20Power/LADWP%20UWMP_2010_LowRes.pdf.

5. Environmental Analysis UTILITIES AND SERVICE SYSTEMS

City of Los Angeles

Water Sources

The Los Angeles Department of Water and Power obtains water supplies from four sources:

- The Los Angeles Aqueduct importing water from the eastern Sierra Nevada
- Water imported from northern California, via the State Water Project, and from the Colorado River, by the Metropolitan Water District of Southern California (MWD)
- Local groundwater from the San Fernando, Sylmar, and Eagle Rock groundwater basins, and the Central, and West Coast subbasins of the Coastal Plain of Los Angeles groundwater basin.
- Recycled water; uses include irrigation, industrial uses, and groundwater recharge.³⁵

Forecast Water Supplies and Demands

Forecast Los Angeles Department of Water and Power water supplies and demands from 2015 through 2035 are shown below in Table 5.18-2.

Table 5.18-2 Forecast Water Supplies and Demands, Los Angeles Department of Water and Power

Source	2015	2020	2025	2030	2035
Water Supplies					
<i>Imported Water</i>					
Los Angeles Aqueduct	252,000	250,000	248,000	246,000	244,000
MWD Water Purchases	248,120	218,040	193,760	198,781	193,027
Water Transfers	40,000	40,000	40,000	40,000	40,000
<i>Subtotal</i>	<i>540,120</i>	<i>508,040</i>	<i>481,760</i>	<i>484,781</i>	<i>477,027</i>
<i>Local Water Sources</i>					
Groundwater	40,500	96,300	111,500	111,500	110,405
Recycled Water	20,000	20,400	42,000	51,500	59,000
Conservation	14,180	27,260	40,340	53,419	64,368
<i>Subtotal</i>	<i>74,680</i>	<i>143,960</i>	<i>193,840</i>	<i>216,419</i>	<i>233,773</i>
Total	614,800	652,000	675,600	701,200	710,800
Water Demands	614,800	652,000	675,600	701,200	710,800

Source: City of Los Angeles Department of Water and Power (LADWP). Adopted May 3, 2011. Urban Water Management Plan.
http://www.water.ca.gov/urbanwatermanagement/2010uwmps/Los%20Angeles%20Department%20of%20Water%20and%20Power/LADWP%20UWMP_2010_LowRes.pdf

Note: numbers shown in acre-feet.

Most of the portions of the District outside the City of Los Angeles—in the South and West ~~Educational Service Center areas~~ ~~Local Districts~~, and most of the East Local District—are in the service areas of two water wholesalers that purchase MWD imported water and resell it to local water purveyors: the Central Basin

³⁵ Ibid. LADWP 2011.

5. Environmental Analysis UTILITIES AND SERVICE SYSTEM

Municipal Water District (CBMWD) and West Basin Municipal Water District (WBMWD). The CBMWD, WBMWD, and LADWP are all member agencies of the MWD.

Central Basin Municipal Water District

Cities and communities within the District and CBMWD's service area include the cities of Vernon, Maywood, Huntington Park, Bell, Cudahy, South Gate, part of the City of Carson; the communities of East Los Angeles, Florence-Graham, and Walnut Park in unincorporated Los Angeles County, and part of the Community of Willowbrook in Los Angeles County.

CBMWD's water supplies include water imported from northern California and the Colorado River by MWD; local groundwater from the Central subbasin of the Coastal Plain of Los Angeles Groundwater Basin; and recycled water.³⁶

Water supplies and demands in CBMWD's service area are summarized in Table 5.18-3.

Table 5.18-3 Forecast Water Supplies and Demands, Central Basin Municipal Water District

Source		2015	2020	2025	2030	2035
Water Supplies	Groundwater	194,400	194,400	194,400	194,400	194,400
	Imported Water	72,360	72,360	72,360	72,360	72,360
	Recycled Water	12,900	17,900	17,900	17,900	17,900
	Total	279,660	284,660	284,660	284,660	284,660
Water Demands		245,825	253,285	260,470	262,355	264,040
Surplus		33,835	31,375	24,190	22,305	20,620

Source: Central Basin Municipal Water District (CBMWD). 2012, April 9. 2010 Urban Water Management Plan. <http://www.centralbasin.org/en/wp-content/uploads/sites/2/2013/11/UWMP-2010-web.pdf>.

West Basin Municipal Water District

Cities and communities within the District and WBMWD's service area include the cities of Carson, Gardena, and Lomita; parts of the cities of Rancho Palos Verdes, Hawthorne, and Inglewood; and communities of West Carson, West Rancho Dominguez, West Athens, and Westmont in unincorporated Los Angeles County.³⁷ WBMWD's water sources are generally similar to those of CBMWD, except that WBMWD also obtains water from desalination. A 2,400-afy capacity desalination facility in the City of Torrance removes chloride from groundwater impacted by seawater. An ocean desalination facility with 20,000 afy capacity is proposed and, if built, completion is anticipated in 2017.³⁸

WBMWD water supplies and demands are summarized in Table 5.18-4.

³⁶ Central Basin Municipal Water District (CBMWD). 2012, April 9. 2010 Urban Water Management Plan. <http://www.centralbasin.org/en/wp-content/uploads/sites/2/2013/11/UWMP-2010-web.pdf>.

³⁷ West Basin Municipal Water District (WBMWD). 2013, February 12. West Basin Municipal Water District Service Area. <http://www.westbasin.org/files/maps/wbmwd-service-area-02-17-2009.pdf>.

³⁸ RMC. 2011, June. West Basin Municipal Water District 2010 Urban Water Management Plan. <http://www.westbasin.org/water-reliability-2020/planning/water-resources-planning>.

5. Environmental Analysis UTILITIES AND SERVICE SYSTEMS

Table 5.18-4 Forecast Water Supplies and Demands, West Basin Municipal Water District

Source		2015	2020	2025	2030	2035
Water Supplies	Groundwater	45,000	45,000	45,000	45,000	45,000
	Imported Water	114,647	76,797	75,386	70,598	69,761
	Recycled Water	16,368	33,882	33,882	37,382	37,382
	Desalination	1,000	21,500	21,500	21,500	21,500
	Total	177,015	177,179	175,768	174,480	173,643
Water Demands		177,015	177,179	175,768	174,480	173,643
Surplus		0	0	0	0	0

Source: RMC. 2011, June. West Basin Municipal Water District 2010 Urban Water Management Plan. <http://www.westbasin.org/water-reliability-2020/planning/water-resources-planning>.

Water Supply Reliability

The Southern California region faces a challenge satisfying its water requirements and securing firm water supplies. Increased environmental regulations and competition for water from outside the region have resulted in reduced supplies of imported water. Continued population and economic growth correspond to increase water demands in the region, putting an even larger burden on local supplies. A number of important factors affecting delivery reliability are discussed below. Major sources of uncertainty include Sacramento Delta pumping restrictions, organism decline, climate change and sea level rise, and levee vulnerability to floods and earthquakes.

MWD's 2010 Regional Urban Water Management Plan. MWD's 2010 Regional Urban Water Management Plan (UWMP) reports on its water reliability and identifies projected supplies to meet the long-term demand within its service area. It presents MWD's supply capacities from 2015 through 2035: single dry year, multiple dry years, and average year.

Colorado River Supplies. The Colorado River Aqueduct (CRA) supplies include water from existing and committed programs and from implementation of agreements to transfer water from agricultural agencies to urban uses. The Colorado River has the potential to supply additional water up to the CRA capacity of 1.25 million af on an as-needed basis.

State Water Project Supplies. MWD's State Water Project supplies have been impacted in recent years by restrictions on SWP operations in accordance with the biological opinions of the U.S. Fish and Wildlife Service and National Marine Fishery Service, issued on December 15, 2008, and June 4, 2009, respectively. In dry, below-normal conditions, MWD has increased the supplies received from the California Aqueduct by developing flexible Central Valley/SWP storage and transfer programs. The goal of the storage/transfer programs is to develop additional dry-year supplies that can be conveyed through the available pumping capacity to maximize deliveries through the California Aqueduct during dry hydrologic conditions and regulatory restrictions.

In June 2007, MWD's Board approved a Delta Action Plan that provides a framework for staff to pursue actions with other agencies and stakeholders to build a sustainable Delta and reduce conflicts between water supply conveyance and the environment. The Delta action plan aims to prioritize immediate short-term

5. Environmental Analysis UTILITIES AND SERVICE SYSTEM

actions to stabilize the Sacramento River Delta while an ultimate solution is selected, and midterm steps to maintain the Bay-Delta while the long-term solution is implemented.

State and federal resource agencies and various environmental and water user entities are currently engaged in the development of the Bay Delta Conservation Plan, which is aimed at addressing Delta ecosystem restoration, water supply conveyance, flood control protection, and storage development. In evaluating the supply capabilities for the 2010 Regional UWMP, MWD assumed a new Delta conveyance is fully operational by 2022 that would return supply reliability similar to 2005 conditions, prior to supply restrictions.

Storage. Storage is a major component of MWD’s dry year resource management strategy. The likelihood of MWD having adequate supply capability to meet projected demands without implementing its water supply allocation plan (WSAP) is dependent on its storage resources. In developing the supply capabilities for the 2010 Regional UWMP, MWD assumed a simulated median storage level going into each of five-year increments based on the balances of supplies and demands.

Supply Reliability. MWD evaluated supply reliability by projecting supply and demand conditions for the single- and multiyear drought cases based on conditions affecting the SWP (MWD’s largest and most variable supply). For this supply source, the single driest year was 1977, and the driest three-year period was 1990 to 1992. The region can provide reliable water supplies not only under normal conditions but also under the single driest year and the multiple dry year conditions.

Water Supply Allocation Plan. Due to drought conditions and the uncertainty regarding future pumping operations from the SWP, MWD adopted a WSAP in 2008 that allocates water to members based on the regional shortage level in MWD’s service area. For future years in which MWD’s supplies are insufficient to meet firm demands, imported supplies to member agencies will be managed in accordance with the WSAP.

Groundwater Reliability

Groundwater basins are managed so that groundwater pumping does not exceed the total of natural and intentional recharge into a basin; such sustainable rate of groundwater pumping is the *safe operating yield*.

Agencies managing groundwater pumping and intentional groundwater recharge for three of the major groundwater basins underlying the District are listed below in Table 5.18-5. All three basins are managed pursuant to court judgments; for each basin, the judgment specifies an agency (Watermaster) responsible for implementing the judgment.

Table 5.18-5 Groundwater Basins Management and Safe Yields

Groundwater Basin	Watermaster	Safe Operating Yield, afy
Coastal Plain of Los Angeles Basin, West Coast Subbasin	Department of Water Resources (DWR)	64,468 pumping rights ¹
Coastal Plain of Los Angeles Basin, Central Subbasin	DWR	217,367 adjudicated water rights ²
San Fernando Valley Basin	Upper Los Angeles River Area Watermaster	87,000 consisting of 43,660 natural recharge plus 43,000 intentional recharge with imported water ³

Sources: DWR 2004; ¹ RMC 2011; ² CBMWD 2012; ³ LADWP 2011.

5. Environmental Analysis UTILITIES AND SERVICE SYSTEMS

2013–2014 Drought

The recent severe drought in California is discussed under *Governor’s Drought Declaration* in Section 5.18.1.1, *Regulatory Framework*, above.

Water Treatment Facilities

Water treatment facilities filter and/or disinfect water before it is delivered to customers.

Metropolitan Water District of Southern California

MWD owns and operates five water treatment facilities. Only one of the five facilities, the Joseph Jensen Treatment Plant in the Community of Granada Hills in the City of Los Angeles, is in or near the District. The Joseph Jensen Treatment Plant has capacity of 750 million gallons per day.³⁹ The remaining four treatment plants have total capacity of about 1.9 billion gallons per day. Two of the four remaining plants are in western Riverside County, one is in eastern Los Angeles County, and one in Orange County. MWD’s distribution system links all five treatment plants, and in the event of a shortage of potable water in the District, could convey treated water to the District from the other four treatment plants.^{40,41}

City of Los Angeles Department of Water and Power

LADWP groundwater treatment systems in the San Fernando Valley include those listed in Table 5.18-6.

Table 5.18-6 Water Treatment Facilities, Los Angeles Department of Water and Power

Facility	Contaminants Treated	Technology	Capacity
San Fernando Valley Groundwater Basin			
Tujunga Wellfield Joint Project	Volatile organic compounds (VOCs)	liquid-phase granular activated carbon	4,680 af treated in 2011–2012 water year; restored 12,000 afy pumping capacity that had become inoperable due to water quality constraints.
North Hollywood Operable Unit	VOCs	Air stripping	1,248 af treated in 2011–2012 water year
Pollock Wells Treatment Plant	VOCs	four liquid-phase granular activated carbon units	2,957 af treated in 2011–2012 water year
Sylmar Groundwater Basin			
Mission Wells Improvement Project (expected completion August 2014)	Trichloroethylene (a VOC)	Not available	3,405 afy

³⁹ Metropolitan Water District of Southern California (MWDSC). 2011, August 3. Joseph Jensen Treatment Plant. <http://www.mwdh2o.com/mwdh2o/pages/yourwater/plants/jensen01.html>.

⁴⁰ Metropolitan Water District of Southern California (MWDSC). 2011, March 9. Service Area Map. <http://www.mwdh2o.com/mwdh2o/pages/about/AR/AR09/MWD-Service-Area-Map.pdf>.

⁴¹ Metropolitan Water District of Southern California (MWDSC). 2013, January. At a Glance. http://www.mwdh2o.com/mwdh2o/pages/news/at_a_glance/mwd.pdf.

5. Environmental Analysis UTILITIES AND SERVICE SYSTEM

Central Basin Municipal Water District

A groundwater treatment facility, the Water Quality Protection Project, treats groundwater for VOC contamination in the City of Pico Rivera in the Central subbasin; the contamination is a plume originating from the San Gabriel Valley to the north. The facility uses granular-activated carbon and has a capacity of 2,000 gallons per minute.⁴²

Wellhead treatment is used in certain places in the Central subbasin to remove TCE, PCE, iron, manganese, arsenic, and carbon tetrachloride from groundwater.⁴³

West Basin Municipal Water District

A 2,400-afy capacity desalination facility in the City of Torrance removes chloride from groundwater impacted by seawater.

5.18.1.4 WASTEWATER SERVICES

Wastewater Collection

Sewer service providers by jurisdiction are listed in Table 5.18-7.

Table 5.18-7 Sewer Service Providers

<u>Educational Service Center Area Local District</u>	<u>City and Community</u>	<u>Sewer</u>
<u>Portions of Northeast, West, East, and South; all of Northwest and Central</u>	<u>City of Los Angeles</u> ⁴⁴	City of Los Angeles Bureau of Sanitation
<u>Northeast</u>	<u>San Fernando</u> ⁴⁵	City of San Fernando Sewer Maintenance Division
<u>West</u>	<u>West Hollywood</u> ⁴⁶	City of West Hollywood Engineering Division
	<u>Unincorporated Los Angeles County: Marina Del Rey</u> ⁴⁷ <u>Los Angeles County (Unincorporated) Marina Del Rey</u>	Marina Del Rey Sewer Maintenance District
<u>East</u>	<u>Bell</u> ⁴⁸ <u>Los Angeles County (Unincorporated)</u> <u>East Los Angeles</u>	<u>City of Bell Engineering Division</u> <u>Los Angeles County Consolidated Sewer Maintenance District</u>
	<u>Cudahy</u> ⁴⁹	<u>Cudahy Public Works Department</u>

⁴² Central Basin Municipal Water District (CBMWD). 2011, March. Draft 2010 Urban Water Management Plan. http://www.centralbasin.org/press_releases/Draft-2010-Urban-Water-Management-Plan.pdf.

⁴³ Water Replenishment District of Southern California (WRD). 2013, October 15. Safe Drinking Water Program. http://www.wrd.org/safe_drinking_water_2013_10_15.pdf.

⁴⁴ City of Los Angeles Bureau of Sanitation (LABOS). 2014, February 4. Wastewater: About Wastewater. <http://www.lacitysan.org/wastewater/index.htm>.

⁴⁵ City of San Fernando. 2014, February 4. Public Works: Sewer Maintenance. http://www.ci.san-fernando.ca.us/city_government/departments/pubworks/divisions/sewer_maint.shtml.

⁴⁶ City of West Hollywood. 2014, February 4. Sewers. <http://www.weho.org/city-hall/city-departments/public-works/engineering/sewers>.

⁴⁷ Los Angeles County Department of Public Works. 2014, February 4. Sewer Maintenance. <http://dpw.lacounty.gov/smd/smd/>.

⁴⁸ City of Bell. 2014, February 3. Utility Providers. <http://www.cityofbell.org/?navid=271>.

5. Environmental Analysis UTILITIES AND SERVICE SYSTEMS

	<u>Huntington Park</u> ⁵⁰	<u>Water and Sewer Division</u>
	<u>South Gate</u> ⁵¹	<u>City of South Gate Water Division</u>
	Unincorporated Los Angeles County: East Los Angeles	<u>Los Angeles County Consolidated Sewer Maintenance District</u>
South	<u>Bell</u> ⁵² <u>Carson</u> ⁵³ <u>Cudahy</u> ⁵⁴	<u>City of Bell Engineering Division</u> <u>Los Angeles County Consolidated Sewer Maintenance District</u> <u>Cudahy Public Works Department</u>
	<u>Gardena</u> ⁵⁵ <u>Huntington Park</u> ⁵⁶	<u>City of Gardena Sanitation Services Division</u> <u>Water and Sewer Division</u>
	<u>Lomita</u> <u>South Gate</u> ⁵⁷	<u>Los Angeles County Consolidated Sewer Maintenance District</u> <u>City of South Gate Water Division</u>
	Unincorporated Los Angeles County communities of: ⁵⁸ - Florence-Graham - West Carson - West Rancho Dominguez - Willowbrook - Willowbrook - Florence-Graham - West Rancho Dominguez	<u>West Carson</u> <u>Los Angeles County Consolidated Sewer Maintenance District</u> <u>Los Angeles County Consolidated Sewer Maintenance District</u> <u>Los Angeles County Consolidated Sewer Maintenance District</u>

Wastewater Treatment

Wastewater Treatment Process

Sanitary wastewater is treated in the following three phases:

- **Primary Treatment:** removal of solids using settling tanks;
- **Secondary Treatment:** reduction of organic matter using bacteria and oxygen; followed by further removal of solids; and
- **Tertiary Treatment:** filtration of wastewater to remove any solids remaining after the first two phases of treatment.

⁴⁹ City of Cudahy. 2014, February 4. Water and Sewer. <http://www.cudahy-wi.gov/cudahy/residents/water+and+sewer/default.asp>.

⁵⁰ City of Huntington Park. 2014, February 4. Water & Sewer Division. <http://www.huntingtonpark.org/index.aspx?nid=76>.

⁵¹ City of South Gate. 2014, February 4. Water/Sewer Service. <http://www.sogate.org/index.cfm/fuseaction/nav/navid/71/>.

⁵² City of Bell. 2014, February 3. Utility Providers. <http://www.cityofbell.org/?navid=274>.

⁵³ City of Carson. 2014, February 4. Street Maintenance. http://ci.carson.ca.us/content/department/dev_service/streetmaint.asp.

⁵⁴ City of Cudahy. 2014, February 4. Water and Sewer. <http://www.cudahy-wi.gov/cudahy/residents/water+and+sewer/default.asp>.

⁵⁵ City of Gardena. 2014, February 4. Sanitation – Sewer System. <http://www.ci.gardena.ca.us/departments/PublicWorks/sanitation.html>.

⁵⁶ City of Huntington Park. 2014, February 4. Water & Sewer Division. <http://www.huntingtonpark.org/index.aspx?nid=76>.

⁵⁷ City of South Gate. 2014, February 4. Water/Sewer Service. <http://www.sogate.org/index.cfm/fuseaction/nav/navid/71/>.

⁵⁸ Los Angeles County Department of Public Works. 2014, February 4. Sewer Maintenance. <http://dpw.lacounty.gov/smd/smd/>.

5. Environmental Analysis UTILITIES AND SERVICE SYSTEM

Most wastewater that undergoes tertiary treatment is disinfected after tertiary treatment. Disinfection methods include chlorine bleach and ultraviolet light. Tertiary-treated wastewater is often reused (i.e. recycled) for landscape and agricultural irrigation, groundwater recharge, and industrial uses.

City of Los Angeles

The City of Los Angeles Bureau of Sanitation provides wastewater treatment to the City. The Bureau of Sanitation operates four wastewater treatment plants:

- Hyperion Treatment Plant in the City of El Segundo provides primary and secondary treatment; capacity 450 million gallons per day (mgd); average daily flows 362 mgd.^{59, 60}
- Donald Tillman Water Reclamation Plant in the Community of Van Nuys (City of Los Angeles) in the San Fernando Valley provides primary, secondary, and tertiary treatment; capacity 80 mgd; average daily flows 67 mgd.^{61, 62}
- Los Angeles-Glendale Water Reclamation Plant in the Community of Atwater Village (City of Los Angeles) in the San Fernando Valley provides primary, secondary, and tertiary treatment; capacity 20 mgd; average daily flows 20 mgd.^{63, 64}
- Terminal Island Water Reclamation Plant on Terminal Island in Los Angeles Harbor in the City of Los Angeles provides primary, secondary, and tertiary treatment; capacity 30 mgd; average daily flows 17.5 mgd.^{65, 66}

Sanitation Districts of Los Angeles County

Most of the District outside of the City of Los Angeles is in the service area of the LACSD. Parts of the District are in the service area of the Joint Water Pollution Control Plant in the City of Carson. This facility provides primary and secondary treatment with capacity of 400 mgd and average daily flows of 280 mgd.⁶⁷

⁵⁹ Los Angeles Bureau of Sanitation (LABOS). 2014, February 4. Hyperion Treatment Plant: About our plant. http://www.lacitysan.org/lasewers/treatment_plants/hyperion/index.htm.

⁶⁰ Los Angeles Bureau of Sanitation (LABOS). 2014, February 4. About Wastewater: Facts and Figures. <http://www.lacitysan.org/wastewater/factsfigures.htm>.

⁶¹ Los Angeles Bureau of Sanitation (LABOS). 2014, February 4. Donald C. Tillman Water Reclamation Plant: About our plant. http://www.lacitysan.org/lasewers/treatment_plants/tillman/index.htm.

⁶² Los Angeles Bureau of Sanitation (LABOS). 2014, February 4. About Wastewater: Facts and Figures. <http://www.lacitysan.org/wastewater/factsfigures.htm>.

⁶³ Los Angeles Bureau of Sanitation (LABOS). 2014, February 4. Los Angeles-Glendale Water Reclamation Plant: About our plant. http://www.lacitysan.org/lasewers/treatment_plants/la_glendale/index.htm.

⁶⁴ Los Angeles Bureau of Sanitation (LABOS). 2014, February 4. About Wastewater: Facts and Figures. <http://www.lacitysan.org/wastewater/factsfigures.htm>.

⁶⁵ Los Angeles Bureau of Sanitation (LABOS). 2014, February 4. Terminal Island Water Reclamation Plant: About our plant. http://www.lacitysan.org/lasewers/treatment_plants/terminal_island/index.htm.

⁶⁶ Los Angeles Bureau of Sanitation (LABOS). 2014, February 4. About Wastewater: Facts and Figures. <http://www.lacitysan.org/wastewater/factsfigures.htm>.

⁶⁷ Los Angeles County Sanitation Districts. 2014, February 4. Joint Water Pollution Control Plant (JWPCP). <http://www.lacsd.org/wastewater/wwfacilities/jwpcp/default.asp>.

5. Environmental Analysis UTILITIES AND SERVICE SYSTEMS

5.18.1.5 STORM DRAINAGE SYSTEMS

The Los Angeles County storm drain system consists of channels, drains, debris basins, and catch basins owned and maintained by the Los Angeles County Flood Control District (LACFCD), the City of Los Angeles, and US Army Corps of Engineers (Corps).⁶⁸

Flood Control Facilities

Major regional flood control facilities in the District and upstream near the District are discussed below.

Northwest and Northeast Local Districts ESC: Los Angeles River Watershed

The primary drainage channel is the Los Angeles River. Major tributaries of the Los Angeles River include Tujunga Wash, Pacoima Wash, Bull Creek, Aliso Canyon Wash, Browns Canyon Wash, Bell Creek, and Arroyo Calabasas. Major flood control dams and basins include Sepulveda Dam on the Los Angeles River, Hansen Dam on Tujunga Wash, and Pacoima Dam on Pacoima Wash.

Central and East Local Districts ESC: Los Angeles River Watershed.

The primary drainage channel is the Los Angeles River, and the major tributary of the Los Angeles River in this area is the Arroyo Seco. The major flood control dam upstream from this area is Devil's Gate Dam and Reservoir in the City of Pasadena.

West Local District ESC: Santa Monica Bay Watershed

The primary drainage channel in the west Los Angeles Basin within the Santa Monica Bay Watershed is Ballona Creek.

South Local District: Los Angeles River Watershed and Dominguez Watershed

ESC Los Angeles River Watershed - The Los Angeles River and the Rio Hondo are the primary drainage channels in this area. Major flood control dams and basins include Whittier Narrows Dam on the Rio Hondo and San Gabriel River.⁶⁹ Dominguez Watershed - The Dominguez Channel is the major drainage channel in this area.

5.18.1.6 SOLID WASTE

Solid Waste Collection

Agencies and companies collecting solid waste in the District are listed by jurisdiction below in Table 5.18-8.

⁶⁸ Los Angeles County Department of Public Works (LADPW). 2014, February 6. Los Angeles County Flood Control District (LACFCD). <http://dpw.lacounty.gov/lacfd/>.

⁶⁹ The Rio Hondo is tributary to the Los Angeles River, and connects the San Gabriel River at Santa Fe Dam in the San Gabriel Valley to the Los Angeles River in the City of South Gate.

5. Environmental Analysis
UTILITIES AND SERVICE SYSTEM

Table 5.18-8 Solid Waste Collection by Jurisdiction

<u>Educational Service Center Area/Local District</u>	<u>City</u>	<u>Solid Waste Collector(s)</u>
Portions of Northeast, West, East, and South; all of Northwest and Central/All	Los Angeles ⁷⁰	City of Los Angeles Bureau of Sanitation
Northeast	San Fernando ⁷¹	Crown Disposal
West	West Hollywood ⁷²	Athens Services
	<u>Unincorporated Los Angeles County- (Unincorporated):</u> Marina Del Rey	<u>City of Los Angeles Bureau of Sanitation</u>
East	<u>Unincorporated Los Angeles County: (Unincorporated):</u> <u>East Los Angeles</u>	Republic Services
	<u>Bell⁷³</u>	<u>Republic Services</u>
	<u>Cudahy⁷⁴</u>	<u>City of Cudahy Public Works Department</u>
	<u>Huntington Park⁷⁵</u>	<u>Waste Management, Inc.</u> <u>Republic Services</u>
	<u>Maywood⁷⁶</u>	<u>Republic Services</u>
	<u>South Gate⁷⁷</u>	<u>Waste Management, Inc.</u>
South	<u>Bell⁷⁸</u> <u>Carson⁷⁹</u>	<u>Republic Services</u> <u>Waste Management, Inc.</u>
	<u>Cudahy⁸⁰</u> <u>Gardena⁸¹</u>	<u>City of Cudahy Public Works Department</u> <u>Waste Resources</u>
	<u>Huntington Park⁸²</u> <u>Lomita⁸³</u> <u>Maywood⁸⁴</u>	<u>Waste Management, Inc.</u> <u>Republic Services</u> <u>Calmet Services</u>

⁷⁰ City of Los Angeles Bureau of Sanitation (BOS). 2014, February 4. Refuse Services. http://san.lacity.org/services/services_refuse.htm.

⁷¹ City of San Fernando. 2014, February 3. Water Department. http://www.ci.sanfernando.ca.us/city_government/departments/pubworks/divisions/water.shtml.

⁷² City of West Hollywood. 2014, February 4. Trash and Recycling: Frequently Asked Questions. <http://www.weho.org/city-hall/city-departments/public-works/environmental-services/trash-and-recycling/frequently-asked-questions>.

⁷³ City of Bell. 2014, February 4. Residential Trash and Recycling. <http://www.cityofbell.org/?navid=74>.

⁷⁴ City of Cudahy. 2014, February 3. Garbage and Recycling. <http://www.cudahy-wi.gov/cudahy/residents/garbage+and+recycling/default.asp>.

⁷⁵ City of Huntington Park. 2014, February 4. Trash Collection. <http://www.huntingtonpark.org/index.aspx?NID=145>.

⁷⁶ City of Maywood. 2014, February 4. Solid Waste & Recycling. http://www.cityofmaywood.com/index.php?option=com_content&view=article&id=61&Itemid=89.

⁷⁷ City of South Gate. 2014, February 4. Refuse & Recycling Services. <http://www.sogate.org/index.cfm/fuseaction/DetailGroup/CID/115/NavID/72/>.

⁷⁸ City of Bell. 2014, February 4. Residential Trash and Recycling. <http://www.cityofbell.org/?navid=74>.

⁷⁹ City of Carson. 2014, February 3. Solid Waste. http://ci.carson.ca.us/content/department/dev_service/solidwaste.asp.

⁸⁰ City of Cudahy. 2014, February 3. Garbage and Recycling. <http://www.cudahy-wi.gov/cudahy/residents/garbage+and+recycling/default.asp>.

⁸¹ City of Gardena. 2014, February 4. Residential Trash Collection FAQs. <http://www.ci.gardena.ca.us/stories/trashcollection.html>.

⁸² City of Huntington Park. 2014, February 4. Trash Collection. <http://www.huntingtonpark.org/index.aspx?NID=145>.

⁸³ City of Lomita. 2014, February 4. Services. <http://lomita.com/CITYHALL/services/index.html>.

⁸⁴ City of Maywood. 2014, February 4. Solid Waste & Recycling. http://www.cityofmaywood.com/index.php?option=com_content&view=article&id=61&Itemid=89.

5. Environmental Analysis UTILITIES AND SERVICE SYSTEMS

South Gate ⁸⁵	Republic Services Waste Management, Inc.
Unincorporated Los Angeles County communities of: - Florence-Graham - West Carson - West Rancho Dominguez - Willowbrook -	Waste Management, Inc.

Solid Waste Disposal

Landfills

City of Los Angeles

The City of Los Angeles is one of 17 member cities of the Los Angeles Regional Agency (LARA), a joint powers authority promoting recycling and solid waste diversion. Data on disposal by landfill is available for LARA but not for the City of Los Angeles. In 2012, 98 percent of the solid waste landfilled from LARA member cities was disposed at nine landfills. One of those landfills, the Puente Hills Landfill in the City of Industry, closed in October 2013. The remaining eight landfills are described in Table 5.18-9.

Table 5.18-9 Landfills Used by Los Angeles Regional Authority

Landfill and Location	Current Remaining Capacity, Cubic Yards	Estimated Close Date	Maximum Daily Load (tons)	Average Daily Disposal, 2012 (tons)
Antelope Valley Public Landfill ⁸⁶ City of Palmdale	20,400,000	2042	3,564	855
Calabasas Sanitary Landfill ⁸⁷ Community of Agoura, unincorporated Los Angeles County	18,100,000	2025	3,500	658
Chiquita Canyon Sanitary Landfill ⁸⁸ Community of Castaic, unincorporated Los Angeles County	29,300,000	2019	6,000	3,090
El Sobrante Landfill ⁸⁹ City of Corona, Riverside County	145,530,000	2045	16,054	6,426
Lancaster Landfill and Recycling Center ⁹⁰ , City of Lancaster	27,700,000	2044	5,100	709
Olinda Alpha Sanitary Landfill ⁹¹	38,578,383	2021	8,000	5,210

⁸⁵ City of South Gate. 2014, February 4. Refuse & Recycling Services. <http://www.sogate.org/index.cfm/fuseaction/DetailGroup/CID/115/NavID/72/>.

⁸⁶ California Department of Resources Recovery and Recycling (CalRecycle). 2014, February 4. Antelope Valley Public Landfill (19-AA-5624). <http://www.calrecycle.ca.gov/SWFacilities/Directory/19-AA-5624/Detail/>.

⁸⁷ California Department of Resources Recovery and Recycling (CalRecycle). 2014, February 4. Calabasas Sanitary Landfill (19-AA-0056). <http://www.calrecycle.ca.gov/SWFacilities/Directory/19-AA-0056/Detail/>.

⁸⁸ California Department of Resources Recovery and Recycling (CalRecycle). 2014, February 4. Chiquita Canyon Sanitary Landfill (19-AA-0052). <http://www.calrecycle.ca.gov/SWFacilities/Directory/19-AA-0052/Detail/>.

⁸⁹ California Department of Resources Recovery and Recycling (CalRecycle). 2014, February 4. El Sobrante Landfill (33-AA-0217). <http://www.calrecycle.ca.gov/SWFacilities/Directory/33-AA-0217/Detail/>.

⁹⁰ California Department of Resources Recovery and Recycling (CalRecycle). 2014, February 4. Lancaster Landfill and Recycling Center (19-AA-0050). <http://www.calrecycle.ca.gov/SWFacilities/Directory/19-AA-0050/Detail/>.

5. Environmental Analysis UTILITIES AND SERVICE SYSTEM

Simi Valley Landfill & Recycling Center ⁹² City of Simi Valley, Ventura County	119,600,000	2052	9,250	2,209
Sunshine Canyon City/County Landfill ⁹³ Community of Sylmar, City of Los Angeles	140,900,000	2037	12,100	5,174

Each of the eight landfills is open six days per week, Monday through Saturday, except for certain holidays.

Sources: California Department of Resources Recovery and Recycling (CalRecycle). 2014, February 4. Jurisdiction Disposal by Facility.

<http://www.calrecycle.ca.gov/lgcentral/Reports/DRS/Destination/JurDspFa.aspx>

Other Jurisdictions:

Most of the District outside of the City of Los Angeles is in the service area of the Los Angeles County Sanitation Districts. LACSD landfills, material recovery facilities, transfer stations, and refuse to energy facilities serving the District include: Calabasas Sanitary Landfill, Puente Hills Materials Recovery Facility, Downey Area Recycling and Transfer Facility, South Gate Transfer Station, Southeast Resource Recovery Facility, and Commerce Refuse-to-Energy Facility.⁹⁴ The Calabasas Sanitary Landfill is described above in Table 5.18-7.

Maximum daily capacities of LACSD material recovery facilities, transfer stations, and refuse to energy facilities serving the District are, in tons per day:

- Materials Recovery Facilities and Transfer Stations
 - Puente Hills Materials Recovery Facility, City of Industry: 4,400⁹⁵
 - Downey Area Recycling and Transfer Facility, City of Downey: 5,000⁹⁶
 - South Gate Transfer Station, City of South Gate: 1,000⁹⁷
- Refuse to Energy Facilities
 - Southeast Resource Recovery Facility, City of Long Beach: 2,240⁹⁸
 - Commerce Refuse-to-Energy Facility, City of Commerce: 1,000⁹⁹

⁹¹ California Department of Resources Recovery and Recycling (CalRecycle). 2014, February 4. Olinda Alpha Sanitary Landfill (30-AB-0035). <http://www.calrecycle.ca.gov/SWFacilities/Directory/30-AB-0035/Detail/>.

⁹² California Department of Resources Recovery and Recycling (CalRecycle). 2014, February 4. Simi Valley Landfill & Recycling Center (56-AA-0007). <http://www.calrecycle.ca.gov/SWFacilities/Directory/56-AA-0007/Detail/>.

⁹³ California Department of Resources Recovery and Recycling (CalRecycle). 2014, February 4. Sunshine Canyon City/County Landfill (19-AA-2000). <http://www.calrecycle.ca.gov/SWFacilities/Directory/19-AA-2000/Detail/>.

⁹⁴ LACSD operates a second landfill, the Scholl Canyon Landfill in the City of Glendale. However, that landfill is limited by Glendale City Ordinance to accepting waste from certain parts of the San Gabriel and San Fernando Valleys, and does not serve the District. Los Angeles County Sanitation Districts (LACSD). 2014, February 5. Scholl Canyon Landfill. <http://www.lacsd.org/solidwaste/swfacilities/landfills/scholl/default.asp>.

⁹⁵ California Department of Resources Recovery and Recycling (CalRecycle). 2014, February 5. Puente Hills Materials Recovery Facility (19-AA-1043). <http://www.calrecycle.ca.gov/SWFacilities/Directory/19-AA-1043/Detail/>.

⁹⁶ California Department of Resources Recovery and Recycling (CalRecycle). 2014, February 5. Downey Area Recycling & Transfer (19-AA-0801). <http://www.calrecycle.ca.gov/SWFacilities/Directory/19-AA-0801/Detail/>.

⁹⁷ California Department of Resources Recovery and Recycling (CalRecycle). 2014, February 5. South Gate Transfer Station (19-AA-0005). <http://www.calrecycle.ca.gov/SWFacilities/Directory/19-AA-0005/Detail/>.

⁹⁸ California Department of Resources Recovery and Recycling (CalRecycle). 2014, February 5. Southeast Resource Recovery Facility (19-AK-0083). <http://www.calrecycle.ca.gov/SWFacilities/Directory/19-AK-0083/Detail/>.

5. Environmental Analysis

UTILITIES AND SERVICE SYSTEMS

Solid Waste Diversion

Fifty-five solid waste diversion programs are provided within the 17-member jurisdictions of the LARA, including composting, material recovery facilities, household hazardous waste collection, public education, recycling, source reduction,¹⁰⁰ special waste materials (such as tires and concrete/asphalt/rubble), and waste-to-energy programs.¹⁰¹

5.18.1.7 ELECTRICITY

The LADWP provides electricity to the City of Los Angeles. Southern California Edison provides electricity to nearly all of the balance of the District. The City of Vernon Light and Power Department provides electricity to the City of Vernon.

City of Los Angeles

LADWP's net maximum generating plant capacity is 7,197 megawatts. LADWP supplied about 25.2 million megawatt-hours of electricity during fiscal year 2010–2011.¹⁰² LADWP's sources of electricity generation during 2012 were: 33 percent coal, 21 percent natural gas, 20 percent renewables (including 13 percent wind), 12 percent unspecified, 10 percent nuclear, and 4 percent large hydroelectric.¹⁰³

Southern California Edison

Total electricity demands in SCE's service area are forecast to increase from 99,224 gigawatt-hours per year (GWH) in 2011 to 109,888 GWH in 2020; one GWH is equivalent to one million kilowatt-hours.¹⁰⁴ SCE's sources of electricity generation in 2012 were 20 percent renewable, including 9 percent geothermal and 8 percent wind; 21 percent natural gas; 7 percent coal; 7 percent nuclear; 4 percent large hydroelectric; and 41 percent unspecified.¹⁰⁵

⁹⁹ California Department of Resources Recovery and Recycling (CalRecycle). 2014, February 5. Commerce Refuse-To-Energy Facility (19-AA-0506). <http://www.calrecycle.ca.gov/SWFacilities/Directory/19-AA-0506/Detail/>.

¹⁰⁰ Source reduction is reducing the amount of waste disposed of through changes in the design, manufacture, packaging or use of a product -- and using fewer toxics. Source reduction also includes reusing or extending the life of products and packaging.

¹⁰¹ California Department of Resources Recovery and Recycling (CalRecycle). 2014, March 18. Jurisdiction Waste Diversion Program Summary. <http://www.calrecycle.ca.gov/LGCentral/reports/diversionprogram/JurisdictionDiversionPrograms.aspx?JurisdictionID=621&Year=2012>.

¹⁰² Los Angeles Department of Water & Power (LADWP). 2014, March 18. Facts & Figures. https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-power/a-p-factandfigures?_adf.ctrl-state=q4accti9m_4&_afLoop=323811493202942.

¹⁰³ Los Angeles Department of Water & Power (LADWP). 2014, March 18. Power Content Label. https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-power/a-p-powercontentlabel?_adf.ctrl-state=q4accti9m_4&_afLoop=323909368047003.

¹⁰⁴ California Energy Commission (CEC). 2012a, June. California Energy Demand 2012 Final Forecast. <http://www.energy.ca.gov/2012publications/CEC-200-2012-001/CEC-200-2012-001-CMF-V2.pdf>.

¹⁰⁵ Southern California Edison (SCE). 2014, March 18. Power Content Label. https://www.sce.com/wps/wcm/connect/16eadc87-3e6b-4610-8929-1178a2d66a03/2012_PowerContentLabel.pdf?MOD=AJPERES.

5. Environmental Analysis UTILITIES AND SERVICE SYSTEM

5.18.1.8 NATURAL GAS

The Southern California Gas Company (SCGC) provides natural gas to nearly the entire District. The Vernon Light and Power Department provides natural gas to the City of Vernon. Total natural gas supplies available to SCGC are forecast to remain constant at 3,875 million cubic feet per day from 2015 through 2030.¹⁰⁶

5.18.2 Thresholds of Significance

According to CEQA Guidelines Appendix G a project would normally have a significant effect on the environment if the project:

- USS-1 Would exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board.
- USS-2 Would require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects.
- USS-3 Would require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects.
- USS-4 Would not have sufficient water supplies available to serve the project from existing entitlements and resources, and new and/or expanded entitlements would be needed.
- USS-5 Would result in a determination by the wastewater treatment provider which serves or may serve the project that it has inadequate capacity to serve the project's projected demand in addition to the provider's existing commitments.
- USS-6 Would be served by a landfill with insufficient permitted capacity to accommodate the project's solid waste disposal needs.
- USS-7 Would not comply with federal, state, and local statutes and regulations related to solid waste.

5.18.3 Environmental Impacts

The applicable thresholds are identified in brackets after the impact statement.

¹⁰⁶ California Gas and Electric Utilities (CGEU). 2012, July. 2012 California Gas Report. http://www.socalgas.com/regulatory/documents/cgr/2012%20CGR_Final.pdf.

5. Environmental Analysis

UTILITIES AND SERVICE SYSTEMS

Impact 5.18-1: The SUP would not exceed wastewater treatment requirements of the Los Angeles Regional Water Quality Control Board. [Thresholds USS-1]

All SUP Projects

All wastewater that would be generated by improvements developed by SUP projects could be treated at wastewater treatment plants of the City of Los Angeles and the Sanitation Districts of Los Angeles County. The SUP would not develop land uses requiring wastewater treatment requirements separate from municipal wastewater treatment. Such requirements are issued for some types of land uses including some industrial uses and large agricultural operations.

Compliance with requirements for discharges to municipal storm water systems are addressed in Section 5.9, *Hydrology and Water Quality*.

Impact 5.18-2: The SUP would not require construction of new or expanded water treatment or wastewater treatment facilities. [Threshold USS-2, USS-5]

WATER TREATMENT FACILITIES

New Construction on New Property or Existing Campus

These projects could expand the total student capacity of the District. However, the SUP would not increase District enrollment. The SUP would accommodate forecast increases in enrollment due to projected increasing numbers of school-aged children as well as higher graduation rates. (Forecast trends in District enrollment are discussed in Chapter 4, *Project Description*.) The SUP therefore would not expand total water consumption within the District, and would not require construction of new or expanded water treatment facilities. Additionally, over the next 10 years student enrollment is projected to decline by about 2 percent. Impacts would be less than significant.

Modernization, Repair, Replacement, Upgrade, Remodel, Renovation and Installation

These projects would not expand capacity and would not expand District enrollment. Thus, these types of projects would not require construction of new or expanded water treatment facilities. No impact would occur.

WASTEWATER TREATMENT FACILITIES

New Construction on New Property or Existing Campus

These types of projects could expand the total student capacity of the District. However, the SUP would not increase District enrollment. It would accommodate forecast increases in enrollment. The SUP would therefore not expand total water consumption within the District and would not require construction of new or expanded wastewater treatment facilities. Additionally, over the next 10 years student enrollment is projected to decline by about 2 percent. Impacts would be less than significant.

5. Environmental Analysis UTILITIES AND SERVICE SYSTEM

Modernization, Repair, Replacement, Upgrade, Remodel, Renovation and Installation

These projects would not expand capacity or District enrollment. Thus, these types of projects would not require construction of new or expanded wastewater treatment facilities, and no impact would occur.

Impact 5.18-3: The SUP would not cause significant environmental effects from the construction of new or expanded storm water drainage facilities. [Thresholds USS-3]

New Construction on New Property or Existing Campus

All new construction projects would be on or next to existing campuses. The vast majority of District schools are in built-out urban neighborhoods where much of the land surface is already impervious. Site-specific project design would include provisions to control surface runoff, and the requirements of applicable NPDES permits and Standard Urban Stormwater Mitigation Plans would be included. For example, the LAUSD requires the collection of storm water runoff, compliance with any applicable NPDES storm water permit, restricting sediment flows into storm drainage systems, and compliance with the District's Stormwater Technical Manual. Compliance with applicable laws, regulations, and standard LAUSD ~~PDFs~~ Standard Conditions and practices during project siting, construction and operation would ensure that impacts associated with runoff water that would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff, are less than significant.

Modernization, Repair, Replacement, Upgrade, Remodel, Renovation and Installation

The SUP would include storm water BMPs that would be adequately designed to accommodate site runoff so that it would not adversely impact downstream storm drain facilities or provide substantial additional sources of polluted runoff. In addition, California Government Code Section 53097 requires school districts to comply with city and county ordinances regulating drainage improvements and requiring review and approval of grading plans as they relate to design and construction of on-site improvements that affect drainage. LAUSD would comply with Section 53097 in implementing the SUP. This compliance would ensure that school projects would not have a significant adverse effect on the local drainage system. The implementation of a project's proposed engineered drainage improvements would ensure that impacts to existing or planned drainage would be less than significant.

Impact 5.18-4: SUP-related projects would have sufficient water supplies available from existing entitlements and resources, and new or expanded entitlements would not be needed. [Thresholds USS-4]

New Construction on New Property or Existing Campus

These types of projects could expand the total student capacity of the District. However, the SUP would not increase District enrollment. It would accommodate forecast increases in enrollment. The SUP would therefore not expand total water consumption within the District. Impacts would be less than significant.

5. Environmental Analysis UTILITIES AND SERVICE SYSTEMS

Modernization, Repair, Replacement, Upgrade, Remodel, Renovation and Installation

Modernization, repair, upgrade, and renovation projects would not expand capacity or District enrollment. Thus, these types of projects would not require new or expanded water supplies, and no impact would occur.

Impact 5.18-5: Landfill facilities would be able to accommodate SUP-related solid waste and the District would comply with related solid waste regulations. [Thresholds USS-6 and USS-7]

SOLID WASTE DISPOSAL CAPACITY

New Construction on New Property or Existing Campus

These types of projects could expand the total student capacity of the District. However, the SUP would not increase District enrollment. The SUP would accommodate forecast increases in enrollment. The SUP would not expand total solid waste generation within the District, and would not require construction of new or expanded wastewater treatment facilities. Impacts would be less than significant.

Modernization, Repair, Replacement, Upgrade, Remodel, Renovation and Installation

Modernization, repair, upgrade, and renovation projects would not expand capacity or District enrollment. Thus, these types of projects would not expand solid waste generation from District facilities, and no impact would occur.

SOLID WASTE REGULATORY COMPLIANCE

All SUP Projects

All projects implemented by the SUP would comply with the recycling requirement in AB 341. All SUP-related projects involving construction and/or demolition would comply with the construction and demolition (C&D) waste recycling/reuse requirement in California Green Building Standards Code Section 5.408, and LAUSD School Design Guide & Specification 01340, Construction & Demolition Waste Management, that requires the collection and separation of all C&D waste materials generated on-site, reuse or recycling on-site, transportation to approved recyclers or reuse organizations, or transportation to legally designated landfills, for the purpose of recycling salvaging and/or reusing a minimum of 75% of the C&D waste generated. Impacts would be less than significant.

5.18.4 Applicable Regulations and Standard Conditions

Water

- California Water Code Sections 10608 et seq.: The Water Conservation Act of 2009
- Governor's Statewide Mandatory Water Reductions Drought Declaration Executive Order, January 17/April 1, 2014/2015
- LAUSD SC-USS-2
- LAUSD SC-GHG-1 through SC-GHG-4

5. Environmental Analysis UTILITIES AND SERVICE SYSTEM

Wastewater

- United States Code, Title 33, Sections 1251 et seq.: Clean Water Act.

Solid Waste

- Public Resources Code 40050 et seq.: Integrated Solid Waste Management Act of 1989
- Assembly Bill 341 (Chapter 476, Statutes of 2011)
- 2013 California Green Building Standards Code, Section 5.408
- LAUSD SC-USS-1 and SC-USS-3

LAUSD Standard Electricity and Natural Gas

- California Green Building Standards Code (CALGreen), California Code of Regulations, Title 24, Part 11
- SC-USS-1 through SC-USS-4
- ~~School Design Guide & Specification 01340, Construction & Demolition Waste Management~~
- ~~LAUSD SC-GHG-5 Project Design Features: PDF PS 1, PDF USS 1, PDF USS 2, PDF USS 3, PDF GHG-1, PDF GHG-2, PDF GHG-3, PDF GHG-4, and PDF GHG-5~~

5.18.5 Level of Significance Before Mitigation

Upon implementation of regulatory requirements and LAUSD Standard Conditions listed above, the following impacts would be less than significant: 5.18-1, 5.18-2, 5.18-3, 5.18-4, and 5.18-5.

5.18.6 Mitigation Measures

No mitigation measures are required.

5.18.7 Level of Significance After Mitigation

Impacts would be less than significant.

5. Environmental Analysis UTILITIES AND SERVICE SYSTEMS

This page intentionally left blank.

6. Significant Unavoidable Adverse Impacts

Chapter 1, *Executive Summary*, Table 1-1, summarizes the impacts, ~~mitigation measures,~~ and levels of significance ~~before and after mitigation.~~ Even with federal, State, and local regulatory compliance, implementation of LASUD Standard Conditions of Approval, and consideration of possible feasible mitigation measures (none were identified), the following impacts ~~are considered potentially significant and may not be feasibly mitigated to a level of insignificance;~~ therefore, ~~so~~ they are considered Significant Unavoidable Adverse Impacts. ~~unavoidable and adverse:~~

6.1 AIR QUALITY

Impact 5.3-2: Regional Construction Emissions. Construction activities may generate short-term emissions that exceed the South Coast Air Quality Management District's regional significance thresholds and cumulatively contribute to the South Coast Air Basin nonattainment designations.

Compliance with SCAQMD ~~regulations rules and~~ implementation of LAUSD SC-AQ-2, SC-AQ-3, and SC-AQ-4 LAUSD Standards would reduce criteria air pollutant emissions from construction-related activities. However, short-term emissions generated from future individual projects could still exceed the SCAQMD regional significance threshold criteria. No additional measures have been identified that would further reduce criteria air pollutant emissions beyond the LAUSD Standard Conditions that are already incorporated into the SUP, and no feasible measures would guarantee a less than significant impact for all SUP-related projects. Therefore, Impact 5.3-2 is considered potentially significant and unavoidable. ~~No additional mitigation measures are available to reduce impacts. Therefore, Impact 5.3-2 is considered potentially significant and unavoidable.~~

Impact 5.3-4: Local Construction Emissions. Site-specific projects may generate short-term emissions that exceed South Coast Air Quality Management District's localized significance thresholds and expose sensitive receptors to substantial pollutant concentrations.

Compliance with SCAQMD regulations and implementation of LAUSD SC-AQ-2, SC-AQ-3, and SC-AQ-4 Standards would reduce ~~criteria~~ localized air pollutant emissions from construction-related activities. However, short-term onsite emissions generated from future individual projects could still exceed the SCAQMD localized significance threshold criteria even after this reduction. No additional measures have been identified that would further reduce localized short-term construction emissions beyond the LAUSD Standard Conditions that are already incorporated into the SUP, and no feasible measures would guarantee a less than significant impact for all SUP-related projects. ~~No additional mitigation measures are available to reduce impacts.~~ Therefore, Impact 5.3-4 is considered potentially significant and unavoidable.

6. Significant Unavoidable Adverse Impacts

6.2 CULTURAL RESOURCES

Impact 5.5-1: Historical Resources. SUP-related project implementation may substantially degrade the significance of historical resources.

Each project that may impact a historic resource will include implementation of SC-CUL-1 through SC-CUL-11 ~~OEHS CEQA Specification Manual, Appendix H, Historical Resources, and PDF CUL-1 through PDF CUL-9~~ to reduce impacts from relocation, conversion, rehabilitation, alteration, damage, or demolition of a historic resource. LAUSD Standard Conditions would reduce historic resource impacts to the extent feasible; however, no mechanism for the full mitigation has been established. Therefore, even with the LAUSD Standard Conditions, impacts associated with the demolition or damage to a historic resource may be significant. Therefore, Impact 5.5-1 is considered potentially significant and unavoidable. ~~would remain significant and unavoidable.~~

6.3 NOISE

Impact 5.12-1: Local Noise Ordinance. SUP implementation may result in exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance.

Projects that place stadiums or other outdoor activity areas near sensitive noise receptors may exceed local ambient noise limits. Implementation of LAUSD ~~PDF SC-N-4~~ would include ~~design features such as~~ buffer zones, berms, sound barriers, or building orientation improvements between playgrounds and adjacent residential uses, or other special design features to reduce ~~increases to~~ noise levels at nearby noise-sensitive land uses to no more than 3 dBA CNEL. However, there is no guarantee that these measures would reduce noise to less than significant levels. Therefore, Impact 5.12-1 is considered potentially significant and unavoidable. ~~Therefore, outdoor noise may be significant and unavoidable.~~

Impact 5.12-2: Construction Vibration. SUP-related project construction activities may result in generation of excessive groundborne vibration.

Demolition and construction for activities within 25 feet of a historic building or where pile driving activities are within 150 feet of a structure may cause vibration annoyance and/or architectural damage. For these types of projects a detailed vibration assessment would be provided by an acoustical engineer to analyze potential impacts to nearby structures from vibration and to determine feasible alternatives to eliminate the potential risk of annoyance and architectural damage. Implementation of LAUSD SC-N-5, SC-N-6, SC-N-7, and SC-N-8 ~~PDFs N-6 to N-8~~ would reduce construction-related vibration impacts, but for some projects these LAUSD ~~standard~~ Standard Conditionss may not be enough to avoid the impact. No additional ~~mitigation~~ measures are available to reduce impacts. Therefore, Impact 5.12-2 is considered potentially significant and unavoidable. ~~would remain significant and unavoidable.~~

Impact 5.12-4: Construction Noise. Construction activities may result in substantial temporary or periodic increase in ambient noise levels in the project vicinity.

6. Significant Unavoidable Adverse Impacts

~~Implementation of LAUSD SC-PDFs AQ-4-2, and SC-N-9-5 to and SC-N-13-9 would reduce noise impacts during construction by limiting the construction schedule, implementing feasible noise attenuation measures, and providing advance notice to nearby noise receptors. However, noise could still have the potential to exceed applicable thresholds at nearby receptors. No additional mitigation measures are available to reduce impacts. Therefore, Impact 5.12-4 is considered potentially significant and unavoidable, related to stationary-source noise. However, noise generated from construction equipment could still have the potential to exceed applicable thresholds at nearby sensitive uses or create substantial noise increases at nearby receptors for extended periods of time. No additional mitigation measures are available to reduce impacts. Therefore, Impact 5.12-4 would remain significant and unavoidable.~~

6.4 TRANSPORTATION AND TRAFFIC

Impact 5.1617-1: Traffic. SUP-related trip generation may have the potential to impact levels of service on the existing area roadway system.

~~Traffic impacts may occur for some projects, such as those that significantly increase students on a campus or construct a large stadium associated with the SUP. Implementation of LAUSD SC-T-1, SC-T-2, SC-T-3 and SC-AQ-5 OEHS CEQA Specification Manual, School Design Guide, and PDFs T-1 and AQ-6 would encourage ride sharing to reduce reliance on private autos; require specific analysis methods to evaluate traffic impacts and implement adequate traffic control devices; and provide adequate site access. Possible mitigation measures to offset vehicular impacts to the roadway system could include installation of traffic signals, intersection and roadway widening and restriping, turn restrictions, and removal of on-street parking. However, it may be infeasible to implement mitigation other measures to reduce potential impacts from future projects to the roadway system. No additional mitigation measures are available to reduce impacts. Therefore, Impact 5.17-1 is considered potentially significant and unavoidable, would remain significant and unavoidable.~~

Impact 5.1617-2: Traffic. SUP-related project trip generation may result in designated road and/or highways exceeding county congestion management agency standards.

~~Traffic impacts may occur for some projects associated with the SUP, such as those that significantly increase students on a campus or construct a large stadium. Implementation of LAUSD SC-T-1, SC-T-2, SC-T-3 and SC-AQ-5 OEHS CEQA Specification Manual, School Design Guide, and PDFs T-1 and AQ-6 would encourage ride sharing to reduce reliance on private auto trips; require specific analysis methods to evaluate traffic impacts and implement adequate traffic control devices; and provide adequate site access. Possible mitigation measures to offset vehicular impacts to the CMP system could include intersection and roadway widening and restriping, and turn restrictions. However, it may be infeasible to implement mitigation other measures to reduce potential impacts from future projects to the CMP system. No additional mitigation measures are available to reduce impacts. Therefore, Impact 5.17-2 is considered potentially significant and unavoidable, would remain significant and unavoidable.~~

6. Significant Unavoidable Adverse Impacts

This page intentionally left blank.

7. Alternatives to the SUP

7.1 INTRODUCTION

7.1.1 Purpose and Scope

The California Environmental Quality Act (CEQA) requires that an environmental impact report (EIR) include a discussion of reasonable project alternatives that would “feasibly attain most of the basic objectives of the project, but would avoid or substantially lessen any significant effects of the project, and evaluate the comparative merits of the alternatives.”¹ This chapter identifies potential alternatives to the proposed project and evaluates them, as required by CEQA.

Key provisions of the CEQA Guidelines on alternatives are summarized below to explain the foundation and legal requirements for the alternatives analysis in the EIR.²

- “The discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly.”³
- “The specific alternative of ‘no project’ shall also be evaluated along with its impact.”⁴
- “The no project analysis shall discuss the existing conditions at the time the Notice of Preparation (NOP) is published, and at the time the environmental analysis is commenced, as well as what would reasonably be expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services. If the environmentally superior alternative is the ‘no project’ alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives.”⁵
- “The range of alternatives required in an EIR is governed by a ‘rule of reason’ that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice. The alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project.”⁶
- “Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or

¹ CEQA Guidelines Section 15126.6

² CEQA Guidelines Sections 15126.6(a) through (f)

³ CEQA Guidelines Section 15126.6(b)

⁴ CEQA Guidelines Section 15126.6(e)(1)

⁵ CEQA Guidelines Section 15126.6(e)(2)

⁶ CEQA Guidelines Section 15126.6(f)

7. Alternatives to the SUP

regulatory limitations, jurisdictional boundaries, and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site (or the site is already owned by the proponent).”⁷

- “For alternative locations, “only locations that would avoid or substantially lessen any of the significant effects of the project need be considered for inclusion in the EIR.”⁸
- “An EIR need not consider an alternative whose effect cannot be reasonably ascertained and whose implementation is remote and speculative.”⁹

For each development alternative, this analysis:

- Describes the alternative
- Analyzes the impact of the alternative compared to the proposed project
- Identifies the impacts of the project that would be avoided or lessened by the alternative
- Assesses whether the alternative would meet most of the basic project objectives
- Evaluates the comparative merits of the alternative and the project

Per the CEQA Guidelines Section 15126.6(d), additional significant effects of the alternatives are discussed in less detail than the significant effects of the project as proposed.

7.1.2 Typical SUP Project Categories

The environmental analysis in this document is based on the following typical SUP project categories.

- Type 1. New Construction on New Property (adjacent to existing campus)
- Type 2. New Construction on Existing Campus
- Type 3. Modernization, Repair, Replacement, Upgrade, Remodel, and Renovation
- Type 4. Operational and Other Campus Changes

7.1.3 Project Objectives

The following objectives have been established for the SUP and will aid decision makers in their review of the project and associated environmental impacts:

- Repair aging schools and improve student safety.
- Upgrade schools to modern technology and educational needs.

⁷ CEQA Guidelines Section 15126.6(f)(1)

⁸ CEQA Guidelines Section 15126.6(f)(2)(A)

⁹ CEQA Guidelines Section 15126.6(f)(3)

7. Alternatives to the SUP

- Create capacity to attract, retain, and graduate more students through a comprehensive portfolio of small, high quality Pre-K through adult schools.
- Promote healthier environment through green technology.

7.2 POTENTIALLY SIGNIFICANT IMPACTS OF THE SUP

A primary consideration in defining SUP alternatives is their potential to reduce or eliminate significant impacts and to meet most of the objectives. The impact analysis in Chapter 5 of this EIR concludes that the following impacts would be potentially significant and unavoidable even after ~~implementation of federal, State, and local regulatory requirements compliance, and implementation of~~ LASUD Standard Conditions of Approval, and consideration of possible feasible mitigation measures (none were identified).

7.2.1 Air Quality

Impact 5.3-2: Regional Construction Emissions. Construction activities may generate short-term emissions that exceed of the South Coast Air Quality Management District's regional significance thresholds and cumulatively contribute to the South Coast Air Basin nonattainment designations.

Impact 5.3-4: Local Construction Emissions. Site-specific projects may generate short-term emissions that exceed South Coast Air Quality Management District's localized significance thresholds and expose sensitive receptors to substantial pollutant concentrations.

7.2.2 Cultural Resources

Impact 5.5-1: Historical Resources. SUP-related project implementation may substantially degrade the significance of historical resources.

7.2.3 Noise

Impact 5.12-1: Local Noise Ordinance. SUP implementation may result in exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance.

Impact 5.12-2: Construction Vibration. SUP-related project construction activities may result in generation of excessive groundborne vibration.

Impact 5.12-4: Construction Noise. Construction activities may result in substantial temporary or periodic increase in ambient noise levels in the project vicinity.

7.2.4 Transportation and Traffic

Impact 5.16-1: Traffic. SUP-related trip generation may have the potential to impact levels of service on the existing area roadway system.

7. Alternatives to the SUP

Impact 5.16-2: Traffic. SUP-related trip generation may result in designated road and/or highways exceeding county congestion management agency standards.

7.3 ALTERNATIVES CONSIDERED AND REJECTED DURING THE PLANNING PROCESS

The following is a discussion of the land use alternatives considered during the scoping and planning process and the reasons why they were not selected for detailed analysis in this Program EIR (EIR).

7.3.1 Alternative Development Areas

CEQA requires that the discussion of alternatives focus on alternatives to the project or its location that are capable of avoiding or substantially lessening any significant effects of the project. The key question and first step in the analysis is whether any of the significant effects of the project would be avoided or substantially lessened by putting the project in another location. Only locations that would avoid or substantially lessen any of the significant effects of the project need be considered for inclusion in the EIR.¹⁰ The project is the SUP for the entire LAUSD. The project 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, the SUP could not be implemented outside of the District's boundaries, and no alternative development area can feasibly be considered.

7.4 ALTERNATIVES SELECTED FOR FURTHER ANALYSIS

Based on the criteria listed above, the following two options were determined to represent a reasonable range of alternatives, have the potential to feasibly attain most of the basic SUP objectives, and may substantially lessen the four potentially significant effects of the SUP.

- No Project Alternative
- Reduced SUP Alternative

An EIR must identify an “environmentally superior” alternative, and where that is the No Project Alternative, the EIR must identify another alternative as environmentally superior. Each alternative's environmental impacts are compared to the proposed SUP and determined to be environmentally superior, neutral, or inferior.

Because of the type of program-level alternatives identified for the SUP (both would significantly reduce all impacts), the following environmental topics found to be less than significant for the proposed SUP would be less than significant for each of the alternatives:

- Aesthetics
- Agriculture and Forestry Resources

¹⁰ CEQA Guidelines Section 15126(5)(B)(1).

7. Alternatives to the SUP

- Biological Resources
- Geology and Soils
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Mineral Resources
- Pedestrian Safety
- Population and Housing
- Public Services
- Recreation
- Utilities and Service Systems

Only those impacts found significant (air quality, cultural resources, noise, and traffic) are used in this alternatives analysis, and only those found significant and unavoidable are used to make the final determination for the superior alternative (for this project same as significant impacts). Section 7.7 identifies the Environmentally Superior Alternative.

7.4.1 No Project Alternative

The No Project Alternative would only involve maintenance and critical repairs required for health and safety, including repair and maintenance of construction, protection, and occupancy features necessary to minimize danger to life and maintain full compliance with current codes and regulations.

This alternative would not involve property acquisition or construction or installation of any buildings. Existing buildings and school campuses would continue to deteriorate (most noticeably cosmetically as nonessential maintenance and repairs are deferred). The No Project Alternative would include, but not be limited to, the following types of minor essential projects:

- Heating, ventilation, and air conditioning (HVAC) repairs needed to maintain classroom temperatures conducive to learning.
- Repair of broken, unsafe walkways and driveways.
- Seismic retrofits.
- Maintenance of fire alarm and fire suppression systems.
- Replacement of poor lighting.
- Repairs to security systems and emergency communications systems.

7. Alternatives to the SUP

- Abatement of asbestos and lead-based paint.
- Replacement of lead pipes.
- Improvements for Americans with Disabilities Act (ADA) compliance: ramps, rails, etc.
- Replacement fencing.
- Essential replacement of building systems such as flooring, windows, and roofing.
- Essential repair of modular units or portable classrooms.
- Relocation of portables on campus to avoid a safety hazard.

7.4.2 Air Quality

This alternative would not involve construction projects that would generate significant air emissions. Most minor projects would not involve heavy construction equipment. The total number of projects that the District would undertake would be significantly reduced in this alternative compared to the proposed SUP. Overall, total emissions would be substantially reduced by this alternative. This alternative would be superior to the SUP.

7.4.3 Cultural Resources

This alternative would not involve demolition or substantial alterations to existing historic buildings except for critical repairs needed for health and safety. However, because these buildings are already some of the oldest in the District, they would deteriorate and may lose some essential defining features. These features could be repaired later when a safety issue arises. Because physical damage and demolition cause the greatest impacts to historic districts and buildings, under this alternative impacts to historical resources would be greatly reduced. This alternative would not involve grading or excavation for construction projects, and would not involve construction on new properties; therefore, any surrounding historic buildings would not be affected. This alternative would be superior to the SUP.

7.4.4 Noise

Under the No Project Alternative the types of projects that would be completed would not involve large construction equipment that would generate significant noise. Standards established in the local general plan or noise ordinance would not be exceeded. Additionally, without the construction equipment, projects would not generate excessive groundborne vibration or significantly increase ambient noise levels. This alternative would be superior to the SUP.

7. Alternatives to the SUP

7.4.5 Transportation and Traffic

This alternative would not construct new classrooms, stadiums, or community use buildings, and would not install field lights. Any project that increases trip generation at an existing school would not be included in this alternative. Therefore, the potential to impact levels of service on the existing area roadway system would not occur. This alternative would be superior to the SUP.

7.4.6 Conclusion

Overall, this alternative would reduce environmental impacts in comparison to the proposed project. The No Project alternative would not meet most of the objectives of the SUP.

- Repair aging schools and improve student safety. This alternative would improve safety but only where there was a critical need for repairs.
- Upgrade schools to modern technology and educational needs. This alternative would not meet this objective because modern technology is not critical to health and safety.
- Create capacity to attract, retain and graduate more students through a comprehensive portfolio of small, high quality Pre-K through adult schools. This alternative would not meet this objective because new seats would not be constructed.
- Promote healthier environment through green technology. This alternative would not meet this objective because, although desired, green technology is not critical to health and safety.

7.5 REDUCED SUP ALTERNATIVE

This alternative would not include installation of more than 9 modular or portable classroom buildings, acquisition of any property, or the construction of any permanent buildings. All projects under this alternative would qualify for one or more of the CEQA statutory or categorical exemptions, as listed in Chapter 4, *Project Description*.

- Installation of modular units, portable classrooms, or bungalows resulting in a net increase student capacity *less than* 25 percent or 10 classrooms, whichever is greater.
- Sustainability energy conservation installations, such as new photovoltaic panels on rooftops and parking-lot shade structures or small wind arrays.
- Essential and cosmetic replacement of building systems such as flooring, windows, and roofing.
- New or replacement furniture or other interior equipment.
- Replace existing diesel buses with higher efficiency buses.

7. Alternatives to the SUP

- Sustainability energy conservation changes, such as replacement, upgrade, or retrofit of inefficient lighting, electrical transformers, or building insulation, and installation of irrigation smart controllers.
- Essential and cosmetic upgrades of modular units or portable classrooms, relocation of portables on campus.
- Exterior cosmetic improvements such as Facelift Program, painting, site cleanup.
- Essential and nonessential interior remodeling and renovations; painting; installation, repair, and upgrades to fire/life-safety/security/emergency systems; ADA; plumbing, lighting, electrical, HVAC, and computer systems; low-flow restroom fixtures; and food service equipment.
- Change in student capacity (student classroom loading but not an increase in school seating).
- Closure of existing school or transfer of students to another school (as long as the increase at the new school does not generate a significant environmental impact).

7.5.1 Air Quality

To qualify for a CEQA exemption, this alternative would not involve construction projects that would generate significant air emissions. These projects would not involve more than two or three pieces of heavy construction equipment. The total number of projects that the District would undertake would be significantly reduced in this alternative. Overall, total emissions would be substantially reduced by this alternative. This alternative would be superior to the SUP.

7.5.2 Cultural Resources

This alternative would not involve demolition of existing historic buildings. Repairs and improvements would occur but could not involve permanent damage to historic features (in-kind replacement would be permitted). Because physical damage and demolition is the greatest impact to historic districts and buildings, impacts to historical resources would be greatly reduced under this alternative. This alternative would not involve grading or excavation for construction projects and would not involve construction on new properties; therefore, any surrounding historic buildings would not be affected. This alternative would be superior to the SUP.

7.5.3 Noise

Under the Reduced SUP Alternative, the types of projects that would be completed would not involve large construction equipment operating adjacent to older, fragile buildings or to noise- and vibration-sensitive land uses. Standards established in the local general plan or noise ordinance would not be exceeded. Projects would involve fewer pieces of construction equipment and would not exceed local noise ordinances. This alternative would be superior to the SUP.

7. Alternatives to the SUP

7.5.4 Transportation and Traffic

This alternative would not construct stadiums or community use buildings and would not install field lights. Any project that significantly increases trip generation at an existing school would not be included in this alternative. Therefore, there would be no potential to impact levels of service on the existing area roadway system. This alternative would be superior to the SUP.

7.5.5 Conclusion

Overall, the Reduced SUP alternative would reduce environmental impacts in comparison to the proposed project. This alternative would not meet some of the objectives of the SUP.

- Repair aging schools and improve student safety. This alternative would meet this objective.
- Upgrade schools to modern technology and educational needs. This alternative is anticipated to meet this objective, but it depends on the scope of the upgrade.
- Create capacity to attract, retain and graduate more students through a comprehensive portfolio of small, high quality Pre-K through adult schools. This alternative would partially meet this objective because of the limit on the number of seats that could be provided at each school to qualify for the CEQA exemption.
- Promote healthier environment through green technology. This alternative is anticipated to meet this objective, but it depends on the scope of the upgrade.

7.6 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

CEQA requires a lead agency to identify the “environmentally superior alternative” and, in cases where the “No Project” Alternative is environmentally superior to the proposed project, the environmentally superior development alternative must be identified. The Reduced SUP Alternative has been identified as “environmentally superior” to the proposed project. This alternative would reduce impacts associated with the SUP by limiting the scope and type of projects that would be undertaken.

7. Alternatives to the SUP

This page intentionally left blank.

8. Significant Irreversible Changes

Section 15126.2(c) of the CEQA Guidelines requires that an environmental impact report (EIR) describe any significant irreversible environmental changes that would be caused by implementation of the SUP. Specifically, the CEQA Guidelines state:

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 highways 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 assure that such current consumption is justified.

In the case of the LAUSD SUP, its implementation would involve a land use, development, and implementation framework to support the next phase of the District's bond program to build, modernize, and repair school facilities to improve student health, safety, and educational quality. The following significant irreversible changes may occur. Implementation would involve:

- Future SUP-related projects development would involve construction activities that entail the commitment of nonrenewable and/or slowly renewable energy resources, including gasoline, diesel fuel, electricity; human resources; and natural resources such as lumber and other forest products, sand and gravel, asphalt, steel, copper, lead, other metals, and water. The commitment of resources required for the construction would limit the availability of such resources for future generations or for other uses.
- Operation of the SUP-related projects would require the use of natural gas and electricity, petroleum-based fuels, fossil fuels, and water. The commitment of resources required for the operation would limit the availability of such resources for future generations or for other uses during the life of each project.
- An increased commitment of social services ~~and public maintenance services~~ (e.g., police and fire protection) would ~~also be~~ long-term obligations required.
- ~~The energy and social service commitments would be long-term obligations in view of the low likelihood of returning the land to its original condition once it has been developed.~~
- SUP implementation may involve a long-term irreversible commitment of vacant parcels of land, and/or redevelopment of existing developed land next to existing District schools.

8. Significant Irreversible Changes

This page intentionally left blank.

9. Growth-Inducing Impacts

Pursuant to Sections 15126(d) and 15126.2(d) of the CEQA Guidelines, this section is provided to examine ways in which the SUP could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. Also required is an assessment of other projects that would foster other activities which could affect the environment, individually or cumulatively. To address this issue, potential growth-inducing effects will be examined through analysis of the following questions:

- Would the SUP remove obstacles to growth, e.g., through the construction or extension of major infrastructure facilities that do not presently exist in the project area, or through changes in existing regulations pertaining to land development?
- Would the SUP result in the need to expand one or more public services to maintain desired levels of service?
- Would this project encourage or facilitate economic effects that could result in other activities that could significantly affect the environment?
- Would approval of the SUP involve some precedent-setting action that could encourage and facilitate other activities that could significantly affect the environment?

Please note that growth-inducing effects are not to be construed as necessarily beneficial, detrimental, or of little significance to the environment. This issue is presented to provide additional information on ways in which this project could contribute to significant changes in the environment, beyond the direct consequences of school facility construction, operation, modernization, repair, replacement, upgrade, remodel, renovation and installation examined in the preceding sections of this EIR.

Would the SUP remove obstacles to growth, e.g., through the construction or extension of major infrastructure facilities that do not presently exist in the project area, or through changes in existing regulations pertaining to land development?

SUP implementation would not extend major infrastructure to places currently unserved by such facilities. The vast majority of existing District schools are in built-out urban and suburban neighborhoods served by infrastructure such as water and sewer mains and electricity and natural gas services. The SUP does not propose development of new schools on new sites; thus, the SUP would not place new schools on land not currently served by such infrastructure.

9. Growth-Inducing Impacts

Would the SUP result in the need to expand one or more public services to maintain desired levels of service?

SUP-related projects would develop new structures that may increase requirements for facilities and personnel for fire protection and for police protection. However, the SUP would not increase total District enrollment or the population in the District. SUP-related projects would accommodate currently projected growth due to projected increasing numbers of school-aged children as well as higher graduation rates. Therefore, project-related increases in requirements for facilities and personnel for fire protection and for police protection would not be a growth-inducing impact.

Would the SUP encourage or facilitate economic effects that could result in other activities that could significantly affect the environment?

Construction would generate short-term employment; operation of such projects could expand total employment by LAUSD and by charter school operators. The unemployment rate in Los Angeles County in December 2013 was estimated at 8.8 percent, and the corresponding estimated rate in the City of Los Angeles was 9.7 percent. Therefore, it is expected that construction employment and most operational employment would be absorbed from the regional labor force and would not attract new workers into the region.

Would approval of the SUP involve some precedent-setting action that could encourage and facilitate other activities that could significantly affect the environment?

SUP approval would not set a precedent that could encourage and facilitate other activities that could significantly affect the environment. School modernization, refurbishment, and expansion projects and programs are common statewide and nationwide. Several ongoing District programs for upgrade, modernization, and replacement of existing facilities are described in Chapter 4, *Project Description*, of this EIR.

10. Draft EIR Comments and Responses

This section discusses the legal requirements for comments and responses, and provides all written comments on the Draft EIR and the District's responses to each comment.

10.1 CEQA REQUIREMENTS REGARDING COMMENTS AND RESPONSES

CEQA Guidelines Section 15204 (a) outlines parameters for submitting comments, and reminds persons and public agencies that the focus of review and comment of Draft EIRs should be

...on the sufficiency of the document in identifying and analyzing possible impacts on the environment and ways in which significant effects of the project might be avoided or mitigated. Comments are most helpful when they suggest additional specific alternatives or mitigation measures that would provide better ways to avoid or mitigate the significant environmental effects. At the same time, reviewers should be aware that the adequacy of an EIR is determined in terms of what is reasonably feasible. ...CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters. When responding to comments, lead agencies need only respond to significant environmental issues and do not need to provide all information requested by reviewers, as long as a good faith effort at full disclosure is made in the EIR.

CEQA Guidelines Section 15204 (c) further advises, "Reviewers should explain the basis for their comments, and should submit data or references offering facts, reasonable assumptions based on facts, or expert opinion supported by facts in support of the comments. Pursuant to Section 15064, an effect shall not be considered significant in the absence of substantial evidence." Section 15204 (d) also states, "Each responsible agency and trustee agency shall focus its comments on environmental information germane to that agency's statutory responsibility." Section 15204 (e) states, "This section shall not be used to restrict the ability of reviewers to comment on the general adequacy of a document or of the lead agency to reject comments not focused as recommended by this section."

In accordance with CEQA, Public Resources Code Section 21092.5, copies of the written responses to public agencies will be forwarded to those agencies at least 10 days prior to certifying the environmental impact report. The responses will be forwarded with copies of this Final EIR, as permitted by CEQA, and will conform to the legal standards established for response to comments on Draft EIRs.

10. Draft EIR Comments and Responses

10.2 COMMENTS AND RESPONSES

Section 15088 of the CEQA Guidelines requires the Lead Agency (District) to evaluate comments on environmental issues received from public agencies and interested parties who reviewed the Draft EIR and prepare written responses.

This section provides all written comments on the Draft EIR and the District's responses to each comment. Comment letters and specific comments are given letters and numbers for reference purposes. Where sections of the Draft EIR are excerpted in this document, the sections are shown indented.

Revisions to the Draft EIR are based on (1) additional or revised information required to respond to a specific comment; (2) applicable updated information that was not available at the time of Draft EIR publication; and/or (3) typographical errors and clarifications. The provision of these changes does not alter any impact significance or conclusions as identified in the Draft EIR. Changes made to the Draft PEIR are identified in this Final EIR as ~~strikeout~~ to indicate deletions and in underlined for additions.

The following is a list of agencies that submitted comments on the Draft EIR during the extended public review period (June 24, 2014 to September 30, 2014). No comments were submitted by residents, organizations, or other interested parties.

Number Reference	Commenting Person/Agency	Date of Comment	Page No.
A1	Fernandeño Tataviam Band of Mission Indians	June 30, 2014	10-3
A2	California Department of Transportation	July 14, 2014	10-7
A3	Los Angeles County Fire Department	July 17, 2014	10-11
A4	California Department of Fish and Wildlife	August 4, 2014	10-17
A5	Los Angeles County Department of Public Works	August 7, 2014	10-29
A6	City of Rancho Palos Verdes	September 30, 2014	10-33

10. Comments to the Draft EIR

LETTER A1 – Fernandño Tataviam Band of Mission Indians (1 page)

From: Caitlin Gulley
Sent: Monday, June 30, 2014 2:02 PM
To: Anderson, John
Subject: School Upgrade Program DEIR: Comment Submission

Mr. Anderson,

I am writing to you on behalf of the Fernandño Tataviam Band of Mission Indians (Tataviam) The following are the current concerns Tataviam has about the SUP DEIR:

On page 5.5-15 PDF# CUL-16, the "Trigger for Compliance" and "Implementation Phase" are of great and grave concern to Tataviam. The two sections indicate that a Native American Resource must be uncovered during grading excavation or ground disturbing activities before action is taken. This is retroactive incompetence and Tataviam seeks to be proactive in the protection of cultural and religious resources of significance to Tataviam.

Native American tribes need to be contacted and consulted with prior to ground breaking activities, during the planning stages of a project. This is not only legally mandated, but also is the most logical order. Tribes have information that archaeological firms and many archaeologists do not. This information can influence project plans and prevent resources from being uncovered in the first place and create a more thorough plan of mitigation should resources still be uncovered. This prevents the loss of money, time, and the image of those involved in the project.

We would like to schedule a meeting with you to discuss your project, the DEIR, and what all of this means to Tataviam.

Thank you for your time,

Caitlin B. Gulley
Tribal Historic and Cultural Preservation
cgulley@tataviam.nsn-us
Fernandño Tataviam Band of Mission Indians
1019 Second Street, Suite 1
San Fernando, California 91340
Phone: [\(818\) 837-0794](tel:(818)837-0794)
Fax: [\(818\) 837-0796](tel:(818)837-0796)
Email: administration@tataviam.nsn.us
Website: <http://www.tataviam.nsn.us>

A1-1

10. Draft EIR Comments and Responses

This page intentionally left blank.

10. Comments to the Draft EIR

A1. Response to comments from Fernandño Tataviam Band of Mission Indians, dated June 30, 2014.


A1-1 This is a program-level environmental document for the School Upgrade Program (SUP). In compliance with CEQA Guidelines Section 15168, the Program EIR was prepared because the project consists of a series of related actions that are linked geographically; are logical parts of a chain of plans that govern the conduct of a continuing program; and are individual activities carried out under the same authority and have generally similar environmental effects. The SUP covers hundreds of school projects within the entire 710-square-mile Los Angeles Unified School District, not all will involve ground disturbing activities. Subsequent activities carried out under the SUP must be evaluated to determine whether an additional CEQA analysis and documentation is required. All site-specific projects that trigger the criteria for compliance with LAUSD Standard Conditions of Approval, as identified in Table 4-1 of this EIR, would implement SC-CUL-1 through SC-CUL-20, as appropriate depending on the type of project and the location. LAUSD Standard Conditions outline the process for cultural resource assessment methodology and procedures for the identification and analysis of historical resources, archaeological resources, and paleontological resources. Compliance would occur prior to project approval. For school construction projects with ground disturbing activities “Each project initiated by the LAUSD must include, at minimum, a Phase I Site Investigation conducted by a qualified archaeologist. A Phase I Site Investigation includes the completion of an archaeological records check, background research, consultation, a field survey, and the preparation of a technical report... Qualified Archaeologist shall consult with the Native American Heritage Commission, and local Native American representatives, and local historical societies” (see SC-CUL-1 -- OEHS CEQA Specification Manual, Appendix H, Historical Resources Policy). Currently there are no site-specific projects proposed; however, Native American tribes would be contacted prior to significant ground disturbing activities on future projects.

10. Draft EIR Comments and Responses

This page intentionally left blank.

10. Comments to the Draft EIR

LETTE A2 – California Department of Transportation (Caltrans) (2 pages)

<p>STATE OF CALIFORNIA—BUSINESS, TRANSPORTATION AND HOUSING AGENCY</p>	<p>EDMUND G. BROWN, JR., Governor</p>
<p>DEPARTMENT OF TRANSPORTATION DISTRICT 7, TRANSPORTATION PLANNING IGR/CEQA BRANCH 100 MAIN STREET, MS # 16 LOS ANGELES, CA 90012-3606 PHONE: (213) 897-9140 FAX: (213) 897-1337</p>	
<p><i>Flex your power! Be energy efficient!</i></p>	
<p>July 14, 2014</p>	
<p>Mr. John Anderson Los Angeles Unified School District 333 South Beaudry Avenue, 28th Floor Los Angeles, CA 90017</p>	
<p>IGR/CEQA No. 140654AL-MND School Upgrade Program (formerly called Districtwide Redevelopment Program) Vic. LA-Various Locations SCH #: 2013111046</p>	
<p>Dear Mr. Anderson:</p>	
<p>Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project. The proposed project consists of repair, expansion, upgrade, and modernization projects at hundreds of neighborhood schools throughout the school district, including fire and seismic safety improvements; hazardous materials code compliance; new and upgraded adult and career education facilities and early childhood education facilities; upgrades to libraries, computer and communications systems, food service facilities, and temporary classrooms; and improved water and energy efficiency, and installation of renewable energy.</p>	<p>A2-1</p>
<p>Caltrans, as a commenting/responsible agency under CEQA, has jurisdiction over the State Highway system and is responsible for identifying the freeway analysis necessary for this project. Caltrans is responsible for obtaining measures that will off-set project vehicle trip generation that worsens Caltrans facilities and hence, it does not adhere to the CMP guide of 150 or more vehicle trips added before freeway analysis is needed. MTA's Congestion Management Program stipulates that Caltrans must be consulted to identify specific locations to be analyzed on the State Highway System.</p>	<p>A2-2</p>
<p>At this time no specific project is identified because this is a program document. When a specific project is identified with increase student enrollment or major administrative center, please include Caltrans in the environmental review process.</p>	<p>A2-3</p>
<p>Please be reminded that any work performed within the State Right-of-way will require an Encroachment Permit from the Caltrans. Any modifications to State facilities must meet all mandatory design standard and specifications.</p>	<p>A2-4</p>
<p><i>"Caltrans improves mobility across California"</i></p>	

10. Draft EIR Comments and Responses

Mr. John Anderson
July 14, 2014
Page 2 of 2

Storm water run-off is a sensitive issue for Los Angeles and Ventura counties. Please be mindful that projects should be designed to discharge clean run-off water. Additionally, discharge of storm water run-off is not permitted onto State highway facilities without a storm water management plan.

A2-5

Transportation of heavy construction equipment and/or materials, which requires the use of oversized-transport vehicles on State highways, will require a transportation permit from Caltrans. It is recommended that large size truck trips be limited to off-peak commute periods. In addition, a truck/traffic construction management plan may be needed for this project if the school construction is near by the State facilities.

A2-6

If you have any questions, please feel free to contact Alan Lin the project coordinator at (213) 897-8391 and refer to IGR/CEQA No. 140654AL.

Sincerely,



DIANNA WATSON
IGR/CEQA Branch Chief

cc: Scott Morgan, State Clearinghouse

"Caltrans improves mobility across California"

10. Comments to the Draft EIR

A2. Response to comments California Department of Transportation (Caltrans), dated July 14, 2014.


- A2-1 The comment summarizes the program description; no response is needed.
- A2-2 The District acknowledges Caltrans' role as a responsible agency and with jurisdiction over the State Highway System.
- A2-3 The District will include Caltrans on the CEQA distribution list for subsequent site-specific projects proposed pursuant to the School Upgrade Program (SUP) that would affect the State Highway System.
- A2-4 Comment noted.
- A2-5 Comment noted.
- A2-6 Comment noted.

10. Draft EIR Comments and Responses

This page intentionally left blank.

10. Comments to the Draft EIR

LETTER A3- Los Angeles County Fire Department (3 pages)



COUNTY OF LOS ANGELES
FIRE DEPARTMENT
1320 NORTH EASTERN AVENUE
LOS ANGELES, CALIFORNIA 90063-3294

DARYL L. OSBY
FIRE CHIEF
FORESTER & FIRE WARDEN

July 17, 2014

John Anderson, Advisor
Los Angeles Unified School District
Office of Environmental Health & Safety
333 South Beaudry Avenue, 28th Floor
Los Angeles, CA 90017

Dear Mr. Anderson:

DRAFT ENVIRONMENTAL IMPACT REPORT, "SCHOOL UPGRADE PROGRAM," IT IS THE NEXT PHASE OF THE DISTRICT'S BOND PROGRAM TO BUILD, MODERNIZE, AND REPAIR SCHOOL FACILITIES TO IMPROVE STUDENT HEALTH, SAFETY, AND EDUCATIONAL QUALITY FOR THE ENTIRE DISTRICT, CITY AND COUNTY WIDE, LOS ANGELES COUNTY (FFER #201400106)

The Draft Environmental Impact Report has been reviewed by the Planning Division, Land Development Unit, Forestry Division, and Health Hazardous Materials Division of the County of Los Angeles Fire Department. The following are their comments:

PLANNING DIVISION:

1. **5.15 PUBLIC SERVICES**

Table 5.15.-1 Fire Protection by Jurisdiction needs to be corrected as follows:

Education Service Center Areas	Fire Department	Jurisdictions
All	Los Angeles Fire Department	City of Los Angeles
North	Los Angeles Fire County Department <i>Los Angeles Fire Department</i>	City of San Fernando

SERVING THE UNINCORPORATED AREAS OF LOS ANGELES COUNTY AND THE CITIES OF:

AGOURA HILLS	CALABASAS	DIAMOND BAR	HIDDEN HILLS	LA MIRADA	MALIBU	POMONA	SIGNAL HILL
ARTESIA	CARSON	DUARTE	HUNTINGTON PARK	LA PUENTE	MAYWOOD	RANCHO PALOS VERDES	SOUTH EL MONTE
AZUSA	CERRITOS	EL MONTE	INDUSTRY	LAKEWOOD	NORWALK	ROLLING HILLS	SOUTH GATE
BALDWIN PARK	CLAREMONT	GARDENA	INGLEWOOD	LANCASTER	PALMDALE	ROLLING HILLS ESTATES	TEMPLE CITY
BELL	COMMERCE	GLENDORA	IRVINDALE	LAWDALE	PALOS VERDES ESTATES	ROSEMead	WALNUT
BELL GARDENS	COVINA	HAWAIIAN GARDENS	LA CANADA FLINTRIDGE	LOMITA	PARAMOUNT	SAN DIMAS	WEST HOLLYWOOD
BELLFLOWER	CUDAHY	HAWTHORNE	LA HABRA	LYNWOOD	PICO RIVERA	SANTA CLARITA	WESTLAKE VILLAG
BRADBURY							WHITTIER

A3-1

10. Draft EIR Comments and Responses

John Anderson
 July 17, 2014
 Page 2

West	Los Angeles County Fire Department	Cities of: Gardena West Hollywood Hawthorne Inglewood Community of Marina Del Rey, Unincorporated Los Angeles County
	Santa Monica Fire Department	City of Santa Monica
	Beverly Hills Fire Department	City of Beverly Hills
	El Segundo Fire Department	City of El Segundo
East	Los Angeles County Fire Department	Community of East Los Angeles, Unincorporated Los Angeles County
	Monterey Park	City of Monterey Park
	Montebello Fire Department	City of Montebello
South	Los Angeles County Fire Department	Cities of: Bell Bell Gardens Carson Commerce Cudahy Huntington Park Lomita Lynwood Maywood Rancho Palos Verdes South Gate Unincorporated Los Angeles County communities of: Florence-Graham West Carson West Rancho Dominguez Willowbrook
	Downey Fire Department	City of Downey
	Vernon Fire Department	City of Vernon
	Long Beach Fire Department	City of Long Beach
	Torrance Fire Department	City of Torrance

A3-1
 cont'd

LAND DEVELOPMENT UNIT:

1. The development of the various projects must comply with all applicable code and ordinance requirements for construction, access, water mains, fire flows and fire hydrants.

A3-2

10. Comments to the Draft EIR

John Anderson
July 17, 2014
Page 3

2. Specific fire and life safety requirements for the construction phase will be addressed at the building fire plan check. There may be additional fire and life safety requirements during this time. | A3-3
3. Fire Department requirements for access, fire flows and hydrants are addressed during the building permit stage. | A3-4
4. Should any questions arise regarding the Land Development Unit's comments, please contact FPEA, Wally Collins, at (323) 890-4243 or at Wally.Collins@fire.lacounty.gov.

FORESTRY DIVISION – OTHER ENVIRONMENTAL CONCERNS:

1. The statutory responsibilities of the County of Los Angeles Fire Department, Forestry Division include erosion control, watershed management, rare and endangered species, vegetation, fuel modification for Very High Fire Hazard Severity Zones or Fire Zone 4, archeological and cultural resources, and the County Oak Tree Ordinance. Potential impacts in these areas should be addressed. | A3-5

HEALTH HAZARDOUS MATERIALS DIVISION:

1. The Department of Toxic Substances Control (DTSC) oversees School Projects for potential hazardous substances contamination. DTSC approval for this project is required. | A3-6

If you have any additional questions, please contact this office at (323) 890-4330.

Very truly yours,



FRANK VIDALES, CHIEF, FORESTRY DIVISION
PREVENTION SERVICES BUREAU

FV:jl

10. Draft EIR Comments and Responses

This page intentionally left blank.

10. Comments to the Draft EIR

A3. Response to comments from Los Angeles County Fire Department, dated July 17, 2014.

A3-1 Table 5.15-1 has been revised and is shown Chapter 5.15, *Public Services*, of this Final EIR.

A3-2 Comment noted.

A3-3 Comment noted.

A3-4 Comment noted.

A3-5 Impacts to rare and endangered species and oak trees protected under the County Oak Tree Ordinance are addressed in Section 5.4, *Biological Resources*, of this EIR. Impacts to erosion control and watershed management are addressed in Section 5.9, *Hydrology and Water Quality*. Impacts to vegetation and compliance with fuel modification zones for Very High Fire Hazard Severity Zones are addressed in Section 5.8, *Hazards and Hazardous Materials*. Impacts to archaeological and cultural resources are addressed in Section 5.5, *Cultural Resources*.

Each site-specific project under the SUP would undergo a separate review. Those projects for which a subsequent environmental document is required would comply with California Environmental Quality Act (CEQA) as amended (Public Resources Code Section 21000 et seq.) and CEQA Guidelines (CCR, Title 14, 15000 et seq.) and would address the Forestry Division items.


A3-6 The District acknowledges that DTSC approval may be required for some projects undertaken as part of the SUP; however, DTSC approval is not required for District certification of the EIR and approval of the SUP.

10. Draft EIR Comments and Responses

This page intentionally left blank.


10. Comments to the Draft EIR

LETTER A4 – California Department of Fish and Wildlife (9 pages)



State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
 South Coast Region
 3883 Ruffin Road
 San Diego, CA 92123
 (858) 467-4201
 www.wildlife.ca.gov

EDMUND G. BROWN JR., Governor
CHARLTON H. BONHAM, Director



August 4, 2014

Mr. John Anderson
 Los Angeles Unified School District
 Office of Environmental Health and Safety
 333 South Beaudry Avenue, 28th Floor
 Los Angeles, CA 90017
 Fax #: (213) 241-4119

Subject: Comments on the Draft Program Environmental Impact Report for the School Upgrade Program

Dear Mr. Anderson:

The California Department of Fish and Wildlife (Department) has reviewed the above-referenced Draft Program Environmental Impact Report (DPEIR) for the School Upgrade Program (Project), formerly called Districtwide Redevelopment Program, prepared by the Los Angeles Unified School District (LAUSD) acting as the Lead Agency under California Environmental Quality Act (CEQA). The following statements and comments have been prepared pursuant to the Department’s authority as Trustee Agency with jurisdiction over natural resources affected by the project (CEQA Guidelines § 15386) and pursuant to our authority as a Responsible Agency under CEQA Guidelines section 15381 over those aspects of the proposed project that come under the purview of the California Endangered Species Act (Fish and Game Code § 2050 *et seq.*) and Fish and Game Code section 1600 *et seq.*

The proposed Project area includes schools throughout the Los Angeles Unified School District (District). The District boundary covers a 710-square-mile area in southern Los Angeles County, which extends north to the San Gabriel Mountains in the Angeles National Forest; west to the Ventura County boundary and to the Pacific Ocean, including the communities of Venice, Marina Del Rey, and Playa Del Rey in the City of Los Angeles; east to the community of East Los Angeles in unincorporated Los Angeles County; and south to the community of San Pedro in the City of Los Angeles, and parts of the cities of Rancho Palos Verdes and Rolling Hills Estates in the Palos Verdes Peninsula. This area includes most of the City of Los Angeles, along with all or portions of 31 cities and unincorporated areas of Los Angeles County.



The proposed Project includes 4 categories of development based on the amount and type of construction and on location of the project: Type 1) new construction on new property (adjacent to existing campus), Type 2) new construction on existing campus, Type 3) modernization, repair, replacement, upgrade, remodel, renovation, and installation, and Type 4) operational and other campus changes. The Facilities Services Division (FSD) is responsible for the overall provision of school facilities in the District. The FSD’s mission is to provide healthy and safe learning environments that support educational achievement through the District. The FSD accomplishes this mission by building new school projects, repairing and modernizing existing school facilities, and promoting joint planning with local communities. The FSD goals are to upgrade existing schools to align with instructional requirements and vision, be safe and secure, and have building systems that are sound and efficient.

Conserving California’s Wildlife Since 1870

A4-1

A4-2

10. Draft EIR Comments and Responses

	<p>Mr. John Anderson Los Angeles Unified School District August 4, 2014 Page 2 of 9</p>	
<p>The Department offers the following comments and recommendations to assist the LAUSD in avoiding or minimizing potential project impacts on biological resources.</p>		
<p>Specific Comments</p>		
<p>1. The DPEIR states that "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 date when a proposed site-specific school project undergoes review. Therefore, this section provides a general discussion of the most important plans and policies that apply to School Upgrade Program (SUP)-related projects. Although some of these may not directly applicable to the SUP or site-specific projects implemented under the SUP, they are included to assist in identifying potential impacts and significance thresholds." Given the programmatic nature of the environmental document, the Department acknowledges that the Lead Agency is not obligated to fully analyze subsequent activities for which insufficient data exists. However, prior to implementation of site-specific projects, a subsequent CEQA document should be prepared to address effects of any activity not included in the scope of the analysis of the programmatic document. At that time, to address broad-scale impacts, the programmatic document may be incorporated by reference while the subsequent CEQA document can address site-specific impacts.</p>	<p>A4-3</p>	
<p>2. Page 5.4-34 of the DPEIR states that "For each construction project on new property, biological resources that could be impacted by the project would be identified by a qualified biologist through a literature search, and, where deemed appropriate by the biologist, a site visit and/or aerial photo analysis would be conducted." A literature search using the California Natural Diversity Database (CNDDDB) generates a list of potential species occurrence. However, it should not be used as evidence of non-occurrence. CNDDDB data is limited to lands that have been surveyed and reported. Therefore, a lack of records in CNDDDB does not mean that rare plants or animals do not occur in a Project area. Field verification for the presence or absence of sensitive species, by a qualified biologist, is necessary to provide a complete biological assessment for adequate CEQA review. CNDDDB record searches expire 6 months from the date they are generated.</p>		<p>A4-4</p>
<p>3. Page 5.4-35 of the DPEIR states that "Construction projects on new properties could impact sensitive natural communities; sensitive natural communities documented as occurring in or near the District are listed above in Table 5.4-5. For each construction project on new property, biological resources that could be impacted by the project would be identified by a qualified biologist. SUP-related projects are required to comply with USFWS [U.S. Fish and Wildlife Service], CDFW [Department] and/or the [U.S.] Army Corps [of Engineers] permitting and LAUSD Standards. Impacts to sensitive natural communities or riparian habitats would be less than significant."</p>		<p>A4-5</p>
<p>The DPEIR does not provide the Department sufficient data to assess whether site-specific projects would have a significant impact on biological resources. The Department is concerned that a significance determination is made on the impacts to sensitive natural communities or riparian habitats absent site-specific biological surveys. Without this information, the full breadth of species and the level of impacts associated with SUP-related projects are not well understood. The Department recommends that the Lead Agency remove any determination of significance regarding the implementation of SUP-related</p>		

10. Comments to the Draft EIR

Mr. John Anderson
Los Angeles Unified School District
August 4, 2014
Page 3 of 9

projects until additional site-specific studies are conducted on which a biological significant determination can be based. This determination could then be incorporated in subsequent CEQA documentation under the PEIR.

A4-5
cont'd

5. Page 5.4-36 of the PDEIR states that "Some SUP-related site-specific projects may require the removal [of] mature trees and shrubs. These could be used for nesting by migratory birds. All projects that would remove trees would implement LAUSD PDF BIO-3 requiring intensive nest search and delaying the removal of trees containing active nests. With this PDF nesting impacts would be less than significant." LAUSD Standards (Table 4-1, Page 4-36) outlines Project Design Features (PDF) BIO-3 as "LAUSD shall either: 1) retain a qualified biologist to conduct an intensive nest search in all trees and buildings slated for removal before construction begins. If nests with young are found, the LAUSD shall not remove the trees until the young have fledged or the nest has been abandoned; or, 2) delay tree or building removal until between September 1 to February 28 to ensure reproductive success for native species using the site for nesting."

- a) Migratory nongame native bird species are protected by international treaty under the Federal Migratory Bird Treaty Act (MBTA) of 1918 (50 C.F.R. Section 10.13). Sections 3503, 3503.5, and 3513 of the California Fish and Game Code prohibit take of all birds and their active nests including raptors and other migratory nongame birds (as listed under the Federal MBTA).
- b) Proposed project activities (including, but not limited to, staging and disturbances to native and nonnative vegetation, structures, and substrates) should occur outside of the avian breeding season which generally runs from February 1-August 31 (as early as January 1 for some raptors) to avoid take of birds or their eggs. Take means to hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture or kill (Fish and Game Code Section 86), and includes take of eggs and/or young resulting from disturbances which cause abandonment of active nests. Depending on the avian species present, a qualified biologist may determine that a change in the breeding season dates is warranted.
- c) If avoidance of the avian breeding season is not feasible, the Department recommends that, beginning thirty days prior to the initiation of project activities, a qualified biologist with experience in conducting breeding bird surveys conduct weekly bird surveys to detect protected native birds occurring in suitable nesting habitat that is to be disturbed and (as access to adjacent areas allows) any other such habitat within 300 feet of the disturbance area (within 500 feet for raptors). The surveys should continue on a weekly basis with the last survey being conducted no more than 3 days prior to the initiation of project activities. If a protected native bird is found, the project proponent should delay all project activities within 300 feet of on- and off-site suitable nesting habitat (within 500 feet for suitable raptor nesting habitat) until August 31. Alternatively, the qualified biologist could continue the surveys in order to locate any nests. If an active nest is located, project activities within 300 feet of the nest (within 500 feet for raptor nests) or as determined by a qualified biological monitor, must be postponed until the nest is vacated and juveniles have fledged and there is no evidence of a second attempt at nesting. Flagging, stakes, and/or construction fencing should be used to demarcate the inside boundary of the buffer of 300 feet (or 500 feet) between the project activities and the

A4-6

10. Draft EIR Comments and Responses

Mr. John Anderson
Los Angeles Unified School District
August 4, 2014
Page 4 of 9

nest. Project personnel, including all contractors working on site, should be instructed on the sensitivity of the area. LAUSD should provide results of the recommended protective measures described above to document compliance with applicable State and Federal laws pertaining to the protection of native birds.

If the biological monitor determines that a narrower buffer between the project activities and observed active nests is warranted, he/she should submit a written explanation as to why (e.g., species-specific information; ambient conditions and birds' habituation to them; and the terrain, vegetation, and birds' lines of sight between the project activities and the nest and foraging areas) to LAUSD. Based on the submitted information, LAUSD will determine whether to allow a narrower buffer.

A4-6
cont'd

- d) The biological monitor should be present on site during all grubbing and clearing of vegetation to ensure that these activities remain within the project footprint (*i.e.*, outside the demarcated buffer) and that the flagging/stakes/fencing is being maintained, and to minimize the likelihood that active nests are abandoned or fail due to project activities. The biological monitor should send weekly monitoring reports to LAUSD during the grubbing and clearing of vegetation, and should notify LAUSD immediately if project activities damage avian nests.
6. BIO-4 from the LAUSD Standards (Table 4-1, Page 4-36) states "LAUSD shall follow options will occur [*sic*]: 1) relocate the tree(s) to another location on the property where the conditions are favorable to survival; 2) replace each healthy mature oak tree within the same property boundaries with at least two new oak trees; or if the options 1 and 2 are not feasible, then LAUSD shall plant a different native species as replacement."
- a) The Department, in general, does not recommend translocation of rare plants, in particular oak trees, as a mitigation/minimization measure to reduce adverse effects from the project. Successful implementation of translocation is rare with minimal documented success. Even if translocation is initially successful, translocated species typically fail to persist over time. To ensure the conservation of sensitive plant species, the Department recommends permanent conservation of habitat containing these species, and any translocation proposed be considered only an experimental component of a larger, more robust mitigation proposal.
- b) Because the goal of the mitigation is to recreate functioning woodland of similar composition, structure, and function to the selected oak woodland that was impacted, the mitigation site should mimic the function, demonstrate recruitment, plant density, and percent basal, canopy, and vegetation cover, as well as other measurable success criteria before the mitigation should be deemed a success. Measurable success criteria (based on present site conditions and/or functional local native woodlands as reference sites) should be part of the plan to ensure that suitable woodland appropriate understory becomes established on the mitigation site.
- c) Due to the inherent difficulty in creating functional woodland habitat with associated understory components, the Department recommends that off-site acquisition of woodland habitat in the local area be considered. All acquired habitat should be protected under a conservation easement and deeded to a local land conservancy for management and protection.

A4-7

10. Comments to the Draft EIR

Mr. John Anderson
Los Angeles Unified School District
August 4, 2014
Page 5 of 9

- d) Oak trees are very long-lived species and take up to 20 years to show signs of stress and disease. The Department recommends the monitoring period for oak woodland be at least 10 years with a minimum of seven (7) years without supplemental irrigation. This allows the trees to go through one typical drought cycle, as our climate typically runs in seven year drought cycles on average. This should also be the minimal time needed to see signs of stress and disease in order to determine the need for replacement plantings.
- e) All seed and shrub sources used for tree and understory species in the mitigation planting site should be collected or grown from on-site sources or from adjacent areas and should not be purchased from a supplier. This should reduce the risk of introducing diseases and pathogens into areas where they might not currently exist.
- f) Oaks should be replaced by planting acorns as this method has been shown to result in greater oak survival when monitoring efforts (including the exclusion of herbivores) are employed to maximize seedling survival during the monitoring period.
- g) The Department is willing to work with LAUSD to review and provide comments on any Transplantation/Restoration Plan.

A4-7
cont'd

General Comments

1. The Department has responsibility for wetland and riparian habitats. It is the policy of the Department to strongly discourage development in wetlands or conversion of wetlands to uplands. We oppose any development or conversion which would result in a reduction of wetland acreage or wetland habitat values, unless, at a minimum, project mitigation assures there will be "no net loss" of either wetland habitat values or acreage. Development and conversion include but are not limited to conversion to subsurface drains, placement of fill or building of structures within the wetland, and channelization or removal of materials from the streambed. All wetlands and watercourses, whether intermittent or perennial, should be retained and provided with substantial setbacks which preserve the riparian and aquatic values and maintain their value to on-site and off-site wildlife populations. The jurisdictional delineation for site-specific projects should be conducted as part of the project-specific review. Mitigation measures to compensate for impacts to mature riparian corridors must be included and must compensate for the loss of function and value of a wildlife corridor.
 - a) The Project area as defined in the Project description supports aquatic, riparian, and wetland habitats; therefore, a jurisdictional delineation of the creeks and their associated riparian habitats should be included in subsequent environmental reviews. The delineation should be conducted pursuant to the U. S. Fish and Wildlife Service wetland definition adopted by the Department.¹ Please note that some wetland and riparian

A4-8

¹ Cowardin, Lewis M., et al. 1979. Classification of Wetlands and Deepwater Habitats of the United States. U.S. Department of the Interior, Fish and Wildlife Service.

10. Draft EIR Comments and Responses

Mr. John Anderson
Los Angeles Unified School District
August 4, 2014
Page 6 of 9

habitats subject to the Department's authority may extend beyond the jurisdictional limits of the U.S. Army Corps of Engineers.

- b) The Department also has regulatory authority over activities in streams and/or lakes that will divert or obstruct the natural flow, or change the bed, channel, or bank (which may include associated riparian resources) of a river or stream, or use material from a streambed. For any such activities, the project applicant (or "entity") must provide written notification to the Department pursuant to section 1600 *et seq.* of the Fish and Game Code. Based on this notification and other information, the Department determines whether a Lake and Streambed Alteration Agreement (LSA) with the applicant is required prior to conducting the proposed activities. The Department's issuance of a LSA for a project that is subject to CEQA will require CEQA compliance actions by the Department as a Responsible Agency. The Department as a Responsible Agency under CEQA may consider the local jurisdiction's (lead agency) Negative Declaration or Environmental Impact Report for the project. To minimize additional requirements by the Department pursuant to section 1600 *et seq.* and/or under CEQA, the document should fully identify the potential impacts to the stream or riparian resources and provide adequate avoidance, mitigation, monitoring and reporting commitments for issuance of the LSA.²
2. The Department considers adverse impacts to a species protected by the California Endangered Species Act (CESA), for the purposes of CEQA, to be significant without mitigation. As to CESA, take of any endangered, threatened, or candidate species that results from the project is prohibited, except as authorized by state law (Fish and Game Code, §§ 2080, 2085.) Consequently, if the Project, Project construction, or any Project-related activity during the life of the Project will result in take of a species designated as endangered or threatened, or a candidate for listing under CESA, the Department recommends that the project proponent seek appropriate take authorization under CESA prior to implementing the project. Appropriate authorization from the Department may include an incidental take permit (ITP) or a consistency determination in certain circumstances, among other options (Fish and Game Code §§ 2080.1, 2081, subds. (b),(c)). Early consultation is encouraged, as significant modification to a project and mitigation measures may be required in order to obtain a CESA Permit. Revisions to the Fish and Game Code, effective January 1998, may require that the Department issue a separate CEQA document for the issuance of an ITP unless the project CEQA document addresses all project impacts to CESA-listed species and specifies a mitigation monitoring and reporting program that will meet the requirements of an ITP. For these reasons, biological mitigation monitoring and reporting proposals should be of sufficient detail and resolution to satisfy the requirements for a CESA ITP.

A4-8
cont'd

Biological Resources within the Project's Area of Potential Effect

3. To provide a complete assessment of the flora and fauna within and adjacent to the project

² A notification package for a LSA may be obtained by accessing the Department's website at www.wildlife.ca.gov/habcon/1600.

10. Comments to the Draft EIR

Mr. John Anderson
Los Angeles Unified School District
August 4, 2014
Page 7 of 9

area, with particular emphasis upon identifying endangered, threatened, sensitive, and locally unique species and sensitive habitats. The DPEIR should include the following information.

- a) Per CEQA Guidelines, section 15125(c), information on the regional setting that is critical to an assessment of environmental impacts should be placed on resources that are rare or unique to the region.
- b) A thorough, recent floristic-based assessment of special status plants and natural communities, following the Department's Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities (see <http://www.dfg.ca.gov/habcon/plant/>). The Department recommends that floristic, alliance- and/or association-based mapping and vegetation impact assessments be conducted at the Project site and neighboring vicinity. The Manual of California Vegetation, second edition, should also be used to inform this mapping and assessment (Sawyer et al. 2008). Adjoining habitat areas should be included in this assessment where site activities could lead to direct or indirect impacts offsite. Habitat mapping at the alliance level will help establish baseline vegetation conditions.
- c) A current inventory of the biological resources associated with each habitat type on site and within the area of potential effect. The Department's California Natural Diversity Data Base in Sacramento should be contacted at www.wildlife.ca.gov/biogeodata/ to obtain current information on any previously reported sensitive species and habitat, including Significant Natural Areas identified under Chapter 12 of the Fish and Game Code.
- d) An inventory of rare, threatened, and endangered, and other sensitive species on site and within the area of potential effect. Species to be addressed should include all those which meet the CEQA definition (see CEQA Guidelines, § 15380). This should include sensitive fish, wildlife, reptile, and amphibian species. Seasonal variations in use of the project area should also be addressed. Focused species-specific surveys, conducted at the appropriate time of year and time of day when the sensitive species are active or otherwise identifiable, are required. Acceptable species-specific survey procedures should be developed in consultation with the Department and the U.S. Fish and Wildlife Service.

A4-8
cont'd

Analyses of the Potential Project-Related Impacts on the Biological Resources

5. To provide a thorough discussion of direct, indirect, and cumulative impacts expected to adversely affect biological resources, with specific measures to offset such impacts, the following should be addressed in the DPEIR.
 - a) A discussion of potential adverse impacts from lighting, noise, human activity, exotic species, and drainage should also be included. The latter subject should address: project-related changes on drainage patterns on and downstream of the project site; the volume, velocity, and frequency of existing and post-project surface flows; polluted runoff; soil erosion and/or sedimentation in streams and water bodies; and post-project fate of runoff from the project site. Mitigation measures proposed to alleviate such impacts should be included.

10. Draft EIR Comments and Responses

Mr. John Anderson
Los Angeles Unified School District
August 4, 2014
Page 8 of 9

- b) Discussions regarding indirect project impacts on biological resources, including resources in nearby public lands, open space, adjacent natural habitats, riparian ecosystems, and any designated and/or proposed or existing reserve lands (e.g., preserve lands associated with a NCCP). Impacts on, and maintenance of, wildlife corridor/movement areas, including access to undisturbed habitats in adjacent areas, should be fully evaluated in the DPEIR.
- c) The zoning of areas for development projects or other uses that are nearby or adjacent to natural areas may inadvertently contribute to wildlife-human interactions. A discussion of possible conflicts and mitigation measures to reduce these conflicts should be included in the environmental document.
- d) A cumulative effects analysis should be developed as described under CEQA Guidelines, section 15130. General and specific plans, as well as past, present, and anticipated future projects, should be analyzed relative to their impacts on similar plant communities and wildlife habitats.

Mitigation for the Project-related Biological Impacts

- 6. The DPEIR should include measures to fully avoid and otherwise protect Rare Natural Communities from project-related impacts. The Department considers these communities as threatened habitats having both regional and local significance.
- 7. The DPEIR should include mitigation measures for adverse project-related impacts to sensitive plants, animals, and habitats. Mitigation measures should emphasize avoidance and reduction of project impacts. For unavoidable impacts, on-site habitat restoration or enhancement should be discussed in detail. If on-site mitigation is not feasible or would not be biologically viable and therefore not adequately mitigate the loss of biological functions and values, off-site mitigation through habitat creation and/or acquisition and preservation in perpetuity should be addressed.
- 8. For proposed preservation and/or restoration, the DPEIR should include measures to perpetually protect the targeted habitat values from direct and indirect negative impacts. The objective should be to offset the project-induced qualitative and quantitative losses of wildlife habitat values. Issues that should be addressed include restrictions on access, proposed land dedications, monitoring and management programs, control of illegal dumping, water pollution, increased human intrusion, etc.
- 9. In order to avoid impacts to nesting birds, the DPEIR should require that clearing of vegetation, and when biologically warranted construction, occur outside of the peak avian breeding season which generally runs from February 1 through September 1 (as early as January for some raptors). If project construction is necessary during the bird breeding season a qualified biologist with experience in conducting bird breeding surveys should conduct weekly bird surveys for nesting birds, within three days prior to the work in the area, and ensure no nesting birds in the project area would be impacted by the project. If an active nest is identified, a buffer shall be established between the construction activities and the nest so that nesting activities are not interrupted. The buffer should be a minimum width of 300 feet (500 feet for raptors), be delineated by temporary fencing, and remain in effect

A4-8
cont'd

10. Comments to the Draft EIR

Mr. John Anderson
Los Angeles Unified School District
August 4, 2014
Page 9 of 9

as long as construction is occurring or until the nest is no longer active. No project construction shall occur within the fenced nest zone until the young have fledged, are no longer being fed by the parents, have left the nest, and will no longer be impacted by the project. Reductions in the nest buffer distance may be appropriate depending on the avian species involved, ambient levels of human activity, screening vegetation, or possibly other factors.

10. The Department generally does not support the use of relocation, salvage, and/or transplantation as mitigation for impacts to rare, threatened, or endangered species. Studies have shown that these efforts are experimental in nature and largely unsuccessful.

11. Plans for restoration and revegetation should be prepared by persons with expertise in southern California ecosystems and native plant revegetation techniques. Each plan should include, at a minimum: (a) the location of the mitigation site; (b) the plant species to be used, container sizes, and seeding rates; (c) a schematic depicting the mitigation area; (d) planting schedule; (e) a description of the irrigation methodology; (f) measures to control exotic vegetation on site; (g) specific success criteria; (h) a detailed monitoring program; (i) contingency measures should the success criteria not be met; and (j) identification of the party responsible for meeting the success criteria and providing for conservation of the mitigation site in perpetuity.

A4-8
cont'd

We appreciate the opportunity to comment on the referenced DPEIR. Questions regarding this letter and further coordination on these issues should be directed to Victoria Chau at (562) 430-5082 or at Victoria.Chou@wildlife.ca.gov.

Sincerely,



Betty J. Courtney
Environmental Program Manager I
South Coast Region

ec: Ms. Erinn Wilson, CDFW, Los Alamitos
Ms. Victoria Chau, CDFW, Los Alamitos
Mr. Scott Morgan, State Clearinghouse, Sacramento

10. Draft EIR Comments and Responses

This page intentionally left blank.

10. Comments to the Draft EIR

A4. Response to comments from California Department of Fish and Wildlife, dated August 4, 2014.

- A4-1 Comment noted.
- A4-2 The comment summarizes the program description; no response required.
- A4-3 As stated in the comment any LAUSD activity (that meets the definition of a ‘project’ under CEQA) not covered by the analysis in the SUP EIR would require subsequent review. It is anticipated that subsequent CEQA documentation would be prepared for some projects.
- A4-4 LAUSD Standard Conditions of Approval have been revised in response to the comment. SC-BIO-1 on page 5.4-12 in Section 5.4, *Biological Resources*, and Chapter 4, Table 4-1 of the EIR, identifies 11 sources of information for the literature search portion of the biological resources report. It also states that the literature search would not be limited to those sources. SC-BIO-1 further specifies that based on the expertise of the qualified biologist the literature search would be supplemented with a site visit. All site-specific research would be included in a biological resources report. The standard condition includes consultation with USFWS and/or CDFW regarding the protection or compensation for resources. Clarifying language about use of the CNDDDB has been added to the impact analysis in Section 5.4, *Biological Resources*, page 5.4-35 of the EIR.
- A4-5 The Program EIR was prepared because the ‘project’ consists of series of related actions that are linked geographically; are logical parts of a chain of plans that govern the conduct of a continuing program; and are individual activities carried out under the same authority and having generally similar environmental effects (CEQA Guidelines Section 15168). The SUP covers hundreds of school projects throughout the entire 710-square-mile school district. Once the Program EIR has been certified, subsequent activities within the program must be evaluated to determine whether an additional CEQA analysis and documentation is required. Each site-specific project under the SUP would undergo a separate review. Those projects for which a subsequent CEQA analysis is required and where biological resources may be affected would comply with Biological Resource Assessment Procedures required under LAUSD SC-BIO-1 through SC-BIO-5 as revised based on CDFW comments. Compliance would occur prior to construction. The significance determinations identified in the EIR are for the program, not for site-specific projects. LAUSD SC-BIO-1 on page 5.4-12 in Section 5.4, *Biological Resources*, of the EIR, requires the biological resources reports for future SUP-related site-specific projects to identify sensitive species and their habitats and would make separate significance determinations for those projects.
- A4-6 Migratory Bird Treaty Act (MBTA) is described on page 5.4-4, and California Fish and Game Code protections for bird nests and eggs are described on page 5.4-7, of Section

10. Draft EIR Comments and Responses

5.4, *Biological Resources*, of the EIR. Additional language has been added to the impact analysis to describe the MBTA compliance. Also, the suggested recommendations for breeding bird surveys and monitoring have been incorporated into SC-BIO-3 in Section 5.4, *Biological Resources*, and Chapter 4, *Project Description*, of the EIR.

A4-7 SC-BIO-4 has been revised to incorporate transplanting oaks as an optional experimental method and not the primary method of protecting oak trees. Also, the specifications for the creation of functioning woodlands, offsite acquisition of woodland habitat, duration for oak woodland monitoring, seed and shrub sources, and replacement from local acorns has been incorporated into the SC-BIO-4 in Section 5.4, *Biological Resources*, and Chapter 4, *Project Description*, of the EIR.

A4-8 Section 5.4, *Biological Resources*, and SC-BIO-1 through SC-BIO-5 in Section 5.4, *Biological Resources*, and Chapter 4, *Project Description*, of the EIR have been revised to incorporate additional text for clarification of CDFW suggested methodology, analysis, and reporting related to California Endangered Species Act, wetlands and riparian habitat, nesting birds, biological resources assessment, and preservation, restoration, and revegetation.

10. Comments to the Draft EIR

LETTER A5 – Los Angeles County Department of Public Works (1 page)

From: Sarda, Juan [<mailto:JSARDA@dpw.lacounty.gov>]
Sent: Thursday, August 07, 2014 2:04 PM
To: Anderson, John
Cc: Ngumba, Andrew; Mardirosian, Teni; Cruz, Ruben; Dubiel, Matthew
Subject: 2014-08-08, LAUSD - SCHOOL UPGRADE PROGRAM - DEIR - Department of Public Works (DPW) Comments

Mr. John Anderson,
Thanks for the opportunity to review the Draft Environmental Impact Report (DEIR) for the Los Angeles Unified School District (***LAUSD School Upgrade Program***).

Los Angeles County Department of Public Works has reviewed the above document and **does not have any specific comments on the DEIR**. However, we would encourage that LAUSD performs project level EIR's if specific projects have the potential to significantly impact County intersections or roadways. A5-1

If you have any questions regarding the Transportation/Traffic comment above please contact Mr. Andrew Ngumba of Traffic and Lighting Division at (626) 300-4851 or angumba@dpw.lacounty.gov.

If you have any other questions or require additional information, please do not hesitate to contact me.

Best regards,

JUAN M SARDA, P.E.
County of Los Angeles Department of Public Works
Land Development Division, Subdivision Mapping Section,
CUP/CEQA/B&T Planning Unit
☎ (626) 458-4921 📠(626)458-4949
[Please click here to take our customer service survey](#)



10. Draft EIR Comments and Responses

This page intentionally left blank.

10. Comments to the Draft EIR

A5. Response to comments from Los Angeles County Department of Public Works, dated August 7, 2014.


A5-1 The Department of Public Works had no specific comments on the Draft EIR. No response is needed.

10. Draft EIR Comments and Responses

This page intentionally left blank.

10. Comments to the Draft EIR

LETTER A6 – City of Rancho Palos Verdes (2 pages)



CITY OF RANCHO PALOS VERDES
CITY MANAGER'S OFFICE
ADMINISTRATION

30 September 2014

Los Angeles Unified School District
Office of Environmental Health & Safety
333 S. Beaudry Ave., 28th Fl.
Los Angeles, CA 90017
ATTN: John Anderson

SUBJECT: Comments on the Draft Program Environmental Impact Report for the School Upgrade Program (SUP)

Dear Mr. Anderson:

The City of Rancho Palos Verdes appreciates the opportunity to comment upon the Draft Program Environmental Impact Report (DPEIR) for the above-mentioned project. We have reviewed the DPEIR and offer the following comments:

1. The DPEIR concludes that the School Upgrade Program (SUP) will have no significant environmental impacts in dozens of impact categories. Potentially-significant impacts are identified in only eight (8) impact categories (relating to air quality, cultural resources, noise, and transportation and traffic), but the PEIR concludes that there is no feasible mitigation available to reduce these impacts to less-than-significant levels. With the adoption of a Finding of Overriding Considerations, there will be no Mitigation Monitoring and Reporting Program for the SUP to which outside agencies and interested parties may refer to ensure that future projects undertaken in the SUP are compliant. Instead, the communities served by LAUSD will be asked to rely upon the District's own internally-developed and -monitored Standard Conditions and Project Design Features (PDFs) to address the environmental impacts of the SUP upon the larger community. Based upon past experience, the City of Rancho Palos Verdes is unconvinced of the efficacy of relying upon internal LAUSD conditions and PDFs in protecting surrounding communities. A6-1
2. The discussion of Alternatives to the SUP (Section 7.0) identifies the "Reduced SUP Alternative" as the Environmentally-Superior Alternative to the proposed project. This alternative achieves many of the stated objectives of the SUP and reduces the few potentially-significant impacts that are identified in the DPEIR. As such, the City of Rancho Palos Verdes supports the consideration of the "Reduced SUP Alternative" rather than the proposed project. A6-2

30940 HAWTHORNE BLVD. / RANCHO PALOS VERDES, CA 90275-5391 / (310) 544-5205 / FAX (310) 544-5291
WWW.PALOSVERDES.COM/RPV
PRINTED ON RECYCLED PAPER

10. Draft EIR Comments and Responses

John Anderson
30 September 2014
Page 2

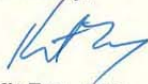
3. Although we understand that the SUP is a Districtwide project, the City of Rancho Palos Verdes is particularly interested in impacts at the two (2) LAUSD campuses within the City. The neighborhoods surrounding these campuses have frequently expressed concern to the City about the lack of consultation and notification provided by the District when temporary/portable classrooms are replaced, added or relocated, or other major construction activities are undertaken. At such time as campus-specific development projects are identified as a part of the SUP, the City of Rancho Palos Verdes would appreciate timely notification of any proposed projects at the following District campuses:

A6-3

Rudecinda Sepulveda Dodson (Middle)	Crestwood Street (Elementary)
28014 Montereina Dr.	1946 Crestwood St.
Rancho Palos Verdes, CA 90275	Rancho Palos Verdes, CA 90275

Again, thank you for the opportunity to comment upon this important project. If you have any questions or need additional information, please feel free to contact me at (310) 544-5226 or via e-mail at kittf@rpv.com.

Sincerely,



Kit Fox, AICP
Senior Administrative Analyst

cc: Mayor Jerry Duhovic and City Council
Carolynn Petru, Acting City Manger
Joel Rojas, Director of Community Development

M:\Border Issues\LAUSD School Upgrade Program\20140930_Anderson_PEIRComments.docx

10. Comments to the Draft EIR

A6. Response to comments from City of Rancho Palos Verdes, dated September 30, 2014.

A6-1 LAUSD prepared a program-level EIR for the School Upgrade Program (SUP). The Program EIR was prepared because the ‘project’ consists of series of related actions that are linked geographically; are logical parts of a chain of plans that govern the conduct of a continuing program; and are individual activities carried out under the same authority and having generally similar environmental effects (CEQA Guidelines Section 15168). The SUP covers hundreds of school projects throughout the entire 710-square-mile Los Angeles Unified School District. Once a Program EIR has been prepared and certified, subsequent activities within the program must be evaluated to determine whether an additional CEQA analysis and documentation is required. Each site-specific project under the SUP would undergo a separate environmental review. Those projects for which a subsequent environmental document is required would comply with California Environmental Quality Act (CEQA) as amended (Public Resources Code Section 21000 et seq.) and CEQA Guidelines (California Administrative Code Section 15000 et seq.). Compliance would occur prior to site-specific project approval. The significance determinations identified in the EIR are for the program, not for site-specific projects.

Although the overall program does not have site specific mitigation measures there are a significant number of LASUD Standard Conditions of Approval outlined in Chapter 4, *Project Description*, Table 4-1, and throughout the sections in Chapter 5. Compliance with LAUSD Standard Conditions of Approval, project design features, and mitigation measures for site-specific projects are tracked using an Environmental Monitoring and Reporting Program. Interested parties and local agencies may inquire about this program by contacting LAUSD OEHS.

A6-2 The District acknowledges the City’s support for the Reduced SUP Alternative.

A6-3 The District will ensure that the City of Rancho Palos Verdes is on distribution lists for CEQA documents (ND, MND, and EIRs) for SUP-related projects at Dodson Middle School and Crestwood Street Elementary School.

10. Draft EIR Comments and Responses

This page intentionally left blank.

11. Persons Preparing EIR

Lead Agency: Los Angeles Unified School District

Gwenn Godek

Senior Planning Advisor - Contract Professional.

Office of Environmental Health & Safety

John Anderson

Previous Senior Planning Advisor - Contract Professional.

Office of Environmental Health & Safety

Jay Golida

Associate General Counsel

CEQA Consultant: PlaceWorks

Dwayne Mears, AICP

Principal, School Facilities Planning

Alice Houseworth, AICP, LEED AP

Senior Associate/Project Manager

Michael Milroy

Associate

Ron Cavagrotti, DEnv

Senior Scientist

Stuart Michener, PG

Senior Geologist

Karl Rodenbaugh, DEnv

Senior Scientist

Steve Bush, EIT

Project Scientist

Cathleen M. Fitzgerald, DEnv, PE, QSD/QSP

Senior Engineer

11. Persons Preparing EIR

John Vang, JD

Associate, Air Quality and GHG

Fernando Sotelo, INCE, PTP

Senior Associate, Noise and Traffic

Robert Kain

GIS Manager

Cary Nakama

Graphic Artist

Gina Froelich

Senior Editor

Laura Muñoz

Document Specialist