Appendix D-1. Environmental Analysis

This appendix discusses the general approach for preparing CEQA compliance analysis and documents for SUP-related projects.

**D-1.1 SUP EIR**

The School Upgrade Program EIR fits the description of a program EIR under CEQA Guidelines Section 15168(a)(4) as one “prepared on a series of actions that can be characterized as one large project and are related . . . [a]s individual activities carried out under the same authorizing statutory or regulatory authority and having generally similar environmental effects which can be mitigated in similar ways.” The advantages of program EIRs are that they:

1. Provide an occasion for a more exhaustive consideration of effects and alternatives than would be practical in an EIR on an individual action,

2. Ensure consideration of cumulative impacts that might be slighted in a case-by-case analysis,

3. Avoid duplicative reconsideration of basic policy considerations,

4. Allow the Lead Agency to consider broad policy alternatives and programwide mitigation measures [and Standard Conditions of Approval] at an early time when the agency has greater flexibility to deal with basic problems or cumulative impacts, and

5. Allow reduction in paperwork.\(^1\)

CEQA does not require a specific level of analysis for a program EIR, but it should correspond to the degree of specificity in the project activities, and it must be detailed enough to provide “decision makers with information which enables them to make a decision which intelligently takes account of environmental consequences. An evaluation of the environmental effects of a proposed project need not be exhaustive, but the sufficiency of an EIR is to be reviewed in the light of what is reasonably feasible.”\(^2\)

**D-1.2 CEQA COMPLIANCE**

The SUP EIR allows adjustments to individual projects without preparing a new environmental document for every change. For this EIR, an environmental document refers to a document that is adopted or certified by the Board of Education, such as an ND, MND, or EIR. An environmental analysis typically refers to a CEQA Initial Study, technical study, written checklist, or similar device to document the evaluation of a site-specific project. The preparation of an Initial Study can lead to either the finding that the SUP-related project

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\(^1\) CEQA Guidelines Section 15168.

\(^2\) CEQA Guidelines Section 15151.
Appendix D. Environmental Analysis

is within the scope of the SUP EIR and no additional or increased impacts would occur (see Section D-1.2.1) or that compared to the finding in the SUP EIR additional or increased impacts would occur (see Section D-1.2.3 and Section D-1.2.5).

D-1.2.1 CEQA Analysis

CEQA does not require an additional, site-specific environmental document if the District determines the site-specific impacts were sufficiently addressed in a program-level EIR. The SUP EIR operates as a project EIR for some types of projects because it reviews and analyzes individual types of SUP-related projects specifically and comprehensively, but within reason given the programmatic nature of the SUP. The SUP EIR's detailed analysis and evaluation for each type of SUP-related project allows the District to proceed with most projects once a location is identified with preliminary environmental analysis. Impact findings will be substantiated using a “written checklist or similar device to document the evaluation of the site and the activity to determine whether the environmental effects of the operation were covered in the program EIR,” as required under CEQA Guidelines Section 15168(c)(4).

Additionally, CEQA does not require a public process unless the OEHS identifies new or greater impacts. In that case, an MND or EIR would be required under CEQA Guidelines Section 15168(c) (see CEQA Tiering discussion below and attached “LAUSD CEQA Process” flow chart).

All projects will be analyzed with any Project Design Features (if proposed), all Standard Conditions of Approval (as appropriate), and all feasible Mitigation Measures (if required). The following defines the differences between these three project-related terms.

D-1.2.1.1 PROJECT DESIGN FEATURES

The distinction between elements of a project (PDF) and additional measures designed to mitigate impacts of the project may not always be clear. For example, for a school project, the use of special non-reflective glass in building windows to eliminate glare from vehicle headlights or sun would be considered to define the project itself. It would not be prudent to analyze the glare impact from using some other standard glass and then consider use of this particular glass as a mitigation measure. However, the same cannot be said of impact-specific avoidance, minimization, and/or measure, such as use of specialized construction equipment. Typically, a PDF is an environmental protection feature that modifies a physical element of a site-specific project and is depicted in a site plan or documented in the project design plans.
D-1.2.1.2 STANDARD CONDITIONS OF APPROVAL

Standard Conditions of Approval are uniformly applied development standards as adopted, listed in Table 4-1 and Appendix F of the SUP EIR. The Standard Conditions consist of standards, guidelines, specifications, practices, plans, policies, programs, and project design features, including but not limited to the following.

- 2004 New Construction Program EIR Mitigation Measures, adopted by the Board of Education on June 2004, as updated.3
- LAUSD Best Management Practices, adopted by the Board of Education on June 2004 as part of the 2004 program EIR, as updated.
- Typical mitigation measures adopted for previous projects.
- LAUSD-approved specifications, practices, policies, and procedural and guidance documents, such as:
  - 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

D-1.2.1.3 MITIGATION MEASURES

Additional actions not depicted in a project plan or design, and that otherwise fit the definition of mitigation under CEQA Guidelines Section 15370, “mitigation” includes:

- Avoiding the impact altogether by not taking a certain action or parts of an action.
- Minimizing impacts by limiting the degree or magnitude of the action and its implementation.
- Rectifying the impact by repairing, rehabilitating, or restoring the impacted environment.

3 New School Construction measures were updated to expand requirements to include School Upgrade Program site-specific projects.
Appendix D. Environmental Analysis

- Reducing or eliminating the impact over time by preservation and maintenance operations during the life of the action.
- Compensating for the impact by replacing or providing substitute resources or environments.

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

D-1.2.2 CEQA Exemption

When an FSD proposed activity is determined by OEHS to be a discretionary action and a “project” under CEQA, environmental analysis is required. The process begins with a review of the project description and determination about whether the project qualifies for an exemption. For projects that qualify for statutory or categorical exemptions, see SUP EIR Chapter 4, Table 4-2, Environmental Compliance for SUP-Related Projects, and Section 4.8.1, Projects Found to Be Categorically Exempt. OEHS will complete the NOE and file it after project approval.

D-1.2.3 INITIAL STUDY

If the project does not qualify for a CEQA exemption, OEHS will prepare a “written checklist or similar device to document the evaluation of the site and the activity to determine whether the environmental effects of the operation were covered in the program EIR.” That process, whether it leads to an ND, MND, EIR, or just a Notice of Determination (NOD), must use a comprehensive and consistent approach to evaluating the potential impacts of a project. No matter what type of environmental document is prepared for a project, the basic analysis process is the same:

- Use significance criteria to determine impacts
- Describe the potential significant impact
- Discuss how Project Design Features avoid or minimize the impact
- Discuss how application of Standard Conditions and/or laws and regulations avoids or minimizes the impact
- Identify whether any impacts remain significant, requiring mitigation measures

Below is a summary of the general approach for site-specific environmental analysis using the written checklist as shown on the attached “General Approach for Initial Study Analysis” flow chart attached. Typically the “written checklist” is the CEQA Initial Study checklist (see LAUSD OEHS checklist in Appendix D-3). However, following preliminary review, if the Lead Agency determines that an EIR will clearly be required for the project, an Initial Study is not required.5

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4 CEQA Guidelines Section 15168(c)(4).
5 CEQA Guidelines Section 15063(a).
D-1.2.3.1 DESCRIBE EXISTING CONDITIONS

The onsite and surrounding conditions at the time the environmental review begins normally provide a baseline from which to determine the project impacts. To describe existing conditions, the following questions should be answered, at a minimum.

- What land uses are currently onsite?
- What are the surrounding land uses?
- What are the topography, vegetation type, and natural community compositions?
- What is the existing population (residents, students, staff)?

In addition, the analysis for each environmental topic will include a context-specific descriptions of existing environmental conditions. For example, the traffic section will describe existing traffic conditions.

D-1.2.3.2 ANALYZE PROJECT

A description of project characteristics should be based on the following questions, at a minimum.

- What are the funding sources? Local, State, Other?
- What size would the development be?
- What would construction activities be? Would there be grading? How long would construction last? How close would it be to homes or classrooms?
- How much vegetation and/or protected trees would require removal.
- What are the building characteristics? Massing, Scale, Lighting?
- What are the hours of operation (school, stadium, adult school, event schedule)?
- How many additional people (students/staff) would be on the site during operation?
- Are infrastructure improvements necessary (curb cuts, sidewalks, utilities, etc.); on and off site?
- What are the site-specific project design features, if any?6

The project description should clearly describe the components of all phases of the proposed project so that both short-term (construction) and long-term (operational) impacts can be determined.

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6 Describe all PDFs; identify each using standard reference protocol (e.g., PDF-AE-1 for a physical element such as special windows that eliminate aesthetic impacts [glare]).
Appendix D. Environmental Analysis

Screening Criteria

The District uses the Initial Study checklist questions in CEQA Guidelines Appendix G as significance thresholds for 17 environmental topics and adds an 18th topic, Pedestrian Safety (see Appendix D-3). Thresholds are the “measuring sticks” against which the project’s environmental impacts are compared to determine their significance.

There are specific screening criteria for environmental topics that require a more technical, quantitative approach, such as air quality, greenhouse gas, noise, and traffic. The screening criteria help determine if further study is needed to identify impact significance. Screening criteria are not bright-line thresholds7 to indicate significant impacts; rather, they provide guidance to determine when impacts would not occur to eliminate topics from detailed analysis.

D-1.2.3.3 APPLY STANDARD CONDITIONS AND REGULATORY COMPLIANCE

A list of the District’s Standard Conditions of Approval is in Chapter 4, Project Description, in each topical section, and as Appendix F of the SUP EIR. Because they are existing plans, policies, and programs, compliance with Standard Conditions is assumed when assessing the potential impacts of the project; they are not mitigation measures. However, the CEQA analysis must assess whether impacts would have been significant absent any project design features and Standard Conditions.

Determine Impact Significance

A significance determination is essential because it would be impossible to determine whether mitigation measures are required or whether other, more-effective measures should be considered without a clear determination.

The project, with any project design features (PDFs), will incorporate all appropriate LAUSD Standard Conditions of Approval and regulatory compliance and document the “topic by topic” analysis in the form of a “written checklist or similar device” (e.g., Initial Study) to substantiate that the site-specific project effects were covered in the SUP EIR. Most subsequent activities are anticipated to be within the scope of the SUP EIR and will not require additional documentation, such as an ND, MND, or EIR. In the Initial Study checklist, items would be marked “no impact” and “less than significant impact.” If the Initial Study finds that the project is covered in the SUP EIR then OEHS need only complete the Initial Study determination page, mark the appropriate box (below), and file the NOD after project approval (see flowchart); no additional CEQA analysis or public noticing is required.

☑️ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been adequately analyzed in an earlier EIR pursuant to applicable standards, and (b) have been avoided or include all applicable Standard Conditions of Approval pursuant to that earlier EIR including revisions or conditions that are imposed upon the proposed project, nothing further is required.

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7 A bright-line threshold is a numeric threshold that assesses total impacts generated by a project compared to existing conditions. Projects that exceed a bright-line threshold are typically considered to have a significant impact. Projects that fall under a bright-line threshold (with or without mitigation) are less than significant.
Although every effort has been made to be as inclusive and thorough as possible, the analysis in this SUP EIR will not provide complete environmental review for every future school construction project. Projects with unique characteristics, such as being in areas of known resources (historic or biological) or significant hazards (liquefaction or landslide), or projects that substantially increase noise or traffic would require further technical study and/or a CEQA document.

If significant impacts are identified, that finding triggers the need to consider a range of specifically targeted mitigation measures, including analysis of whether the project itself could be modified to lessen the impact. If OEHS determines that a project impact exceeds the significance criteria (with any project design features, Standard Conditions, and regulatory compliance incorporated), the impact is considered “potentially significant.” Significant impacts require that all feasible mitigation measures are considered.

**D-1.2.3.4 FORMULATE MITIGATION**

Mitigation measures are formulated after substantiating that an impact is potentially significant. When mitigation measures can reduce impacts to less than significant levels, an MND is required. If all feasible mitigation measures are considered but would not reduce impacts to less than significant levels, an EIR is required, but it can focus just on the topics that result in significant impacts. All conclusions, before and after mitigation, must be substantiated in the analysis. Mitigation measures must be feasible and properly drafted to be enforced and implemented by the District (see Section D-1.2.6, Environmental Monitoring and Reporting Program, below).

**D-1.2.3.5 DETERMINE SIGNIFICANCE AFTER MITIGATION**

After the implementation of all project design features, Standard Conditions, laws and regulations, and mitigation measures, the resulting level of significance is determined.

If the additional mitigation measures reduce impacts below the significance criteria then OEHS will complete the Initial Study determination page, mark the appropriate box (below), prepare the MND and file the NOC, NOI, and MND with supporting Initial Study (CEQA tiering below); public noticing is required.

- I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

If no mitigation measures are feasible, or mitigation measures would reduce impacts but not to less than significant levels, the remaining impacts are considered significant and unavoidable. OEHS will complete the Initial Study determination page, mark the appropriate box (below), and file the NOC, NOP and Initial Study, and prepare an EIR (but only needs to focus on the significant impact) (CEQA tiering below); public noticing is required.

- I find that the proposed project MAY have a “potentially significant impact” or “potentially significant unless mitigated” impact on the environment, but at least one effect 1) has been adequately

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Appendix D. Environmental Analysis

analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

The District may choose to approve a project despite impacts identified in the EIR, but it must prepare and adopt a statement of overriding considerations at the same hearing as the Final EIR certification.

D-1.2.4 CEQA Infill Streamlining

PRC Section 21083.3 and Guidelines Section 15183.3 address streamlining for infill projects: “The purpose of this section is to streamline the environmental review process for eligible infill projects by limiting the topics subject to review at the project level where the effects of infill development have been addressed in a planning level decision or by uniformly applicable development policies.”

To qualify for the streamlined review, the project must (1) be within and consistent with either a sustainable communities strategy or an alternative planning strategy or (2) meet the definition of a small walkable community project as set forth in the Guidelines, and (3) meet certain other standards set forth in the Guidelines. Because most SUP-related projects would qualify, CEQA does not apply to significant effects of that project that were previously evaluated in the SUP EIR (even if the impacts were not reduced to less than significant). Also, if the District makes a finding that an impact can be “substantially mitigated” through application of uniform development policies (Standard Conditions), that effect does not need to be evaluated. CEQA Guidelines Appendix M sets performance standards for such infill projects, and Appendix N has a specialized Initial Study checklist that can be used for such projects. This process is different than the NOE for a Class 32 exemption for city infill on sites up to 5 acres, and would only streamline CEQA for projects with potentially significant impacts. No public review is required.

D-1.2.5 CEQA Tiering

The SUP EIR will streamline future environmental compliance and reduce the need for repetitive environmental studies. The analysis in this SUP EIR will serve as the framework and baseline for CEQA analysis of later projects through a process known as “tiering.” Under CEQA Guidelines Sections 15152(a) and 15385,

“Tiering” refers to using the analysis of general matters contained in a broader EIR (such as one prepared for a program) with later EIRs and negative declarations on narrower projects; incorporating by reference the general discussions from the broader EIR; and concentrating the later EIR or negative declaration solely on the issues specific to the later project.

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9 CEQA Guidelines Section 15183.3(a).
10 CEQA Guidelines Section 15183.3(c).
11 CEQA Guidelines Section 15152(a).
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 (or ND); [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.12

The majority of LAUSD CEQA documents, if not all, will follow the tiering style of analysis (tiering is only used for CEQA documents -- NDs, MNDs, and EIRs); however, the majority of SUP-related projects will not require a CEQA document. Tiering is only for projects that are not within the scope of the SUP EIR and may have additional or increased impacts. Public review is required (see attached “LAUSD CEQA Process” flow chart).

**D-1.2.6 Environmental Monitoring and Reporting Program**

The use of an Environmental Monitoring and Reporting Program13 commits the District to compliance, monitoring and follow-up. CEQA's rules governing deferred mitigation recognize that where practical reasons preclude fully formulating mitigation measures at the time of project approval, the agency may commit to devising specific measures later, provided such measures are required to satisfy performance criteria or standards that would mitigate the adverse effects and are articulated at the time of project approval. CEQA prohibits deferred mitigation with loose or open-ended performance criteria. With performance standards, the details of exactly how mitigation will be achieved under the identified measures can be delayed pending completion of a future study.

“The discussion of mitigation measures shall distinguish between the measures which are proposed by project proponents to be included in the project and other measures proposed by the lead, responsible or trustee agency or other persons which are not included but the Lead Agency determines could reasonably be expected to reduce adverse impacts if required as conditions of approving the project.”14

CEQA Guidelines requires that “When making the findings . . . the agency shall also adopt a program for reporting on or monitoring the changes which it has either required in the project or made a condition of approval to avoid or substantially lessen significant environmental effects.”15

In compliance with CEQA Guidelines Section 15091(d), the LAUSD Environmental Monitoring and Reporting Program will include more than just mitigation measures; it will have all project-specific measures.

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12 CEQA Guidelines Section 15385.
13 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.”
14 CEQA Guidelines Section 15126.4(a)(1)(A).
15 CEQA Guidelines Section 15091(d).
identified to avoid, minimize, rectify, restore, rehabilitate, reduce, eliminate, or compensate for environmental impacts, including Project Design Features (if proposed), Standard Conditions of Approval (as appropriate), and Mitigation Measures (if required). An example of the Environmental Monitoring and Reporting Program Matrix is shown below.

<table>
<thead>
<tr>
<th>ENVIRONMENTAL TOPIC (e.g., Air Quality, Pedestrian Safety, etc.)</th>
<th>Reference #*</th>
<th>Measure</th>
<th>Responsible for Implementation</th>
<th>Timing</th>
<th>Responsible for Monitoring</th>
<th>Monitor (Signature and Date of Compliance)</th>
</tr>
</thead>
<tbody>
<tr>
<td>SC-AE-1</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>PDF-T-8</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>MM-GHG-3</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

* SC = Standard Condition
PDF = Project Design Feature
MM = Mitigation Measure

The numbering system for each SC should correspond with the numbering system used in the SUP EIR (e.g., SC-AE-1; SC-GHG-4). PDFs and MMs should correspond with the numbering system used in the site-specific project MND or EIR (e.g., PDF-AE-2; MM-GHG-3).
LAUSD CEQA PROCESS

FSD Site-Specific Activity
PRELIMINARY PROJECT REFERRAL FORM TO OEHS

Activity is a “Project”

Y

Project is Exempt

N

OEHS CEQA Determination

Y

Approve Project

File NOE*

30-DAY STATUTE

N

Initial Study
GENERAL APPROACH FLOW CHART

Impacts Analyzed in
SUP EIR

Impacts

N

Approve Project

File NOD*

30-DAY STATUTE

Y

Initial Study
Determination

Y

Approve Project

File NOD*

30-DAY STATUTE

N

New Significant
Unmitigable Impact

Y

NOP & NOC
30-DAY PUBLIC REVIEW

Scoping Meeting
(OPTIONAL)

Draft EIR

NOA & NOC
45-DAY PUBLIC REVIEW

Public Meeting
(OPTIONAL)

Final EIR,
FOF, SOC, EMRP

Certify EIR,
Make Findings,
Adopt SOC & EMRP

Approve Project

File NOD*

30-DAY STATUTE

N

Consider Comments

Y

Adopt ND

Adopt MND & EMRP

Approve Project

File NOD*

30-DAY STATUTE

ND or MND

NOI & NOC
30-DAY PUBLIC REVIEW

*File NOE & NOD at OPR; File NOD & CDFW SUP EIR payment receipt at County. If there are mitigation measures for biological resource impacts pay CDFW fees. The EMRP includes all project design features (PDF), standard conditions of approval (SC), and mitigation measures (MM) and satisfies CEQA Guidelines Section 15097.
**General Approach for Initial Study Analysis**

1. **Describe Existing Conditions**

2. **Analyze Project***
   - INCLUDING ANY PDFs

3. **Exceeds Significance Criteria?**
   - N
   - Y

4. **Apply Standard Conditions and Regulatory Compliance**
   - N

5. **Impacts Less Than Significant?**
   - Y
   - N

6. **Formulate Mitigation***

7. **Determine Significance After Mitigation**

8. **Impacts Less Than Significant?**
   - Y
   - N

9. **Prepare MND**

10. **Prepare EIR**

---

* Describe all PDFs; identify each using standard reference protocol (e.g., PDF-AE-1 for a physical element of a site-specific project such as special building windows that eliminate aesthetic impacts (glare)).

** Describe all SCs; identify each using standard reference protocol (e.g., SC-AE-1 for project standards adopted as part of the SUP EIR for historic building reuse that would eliminate demolition of historic architecture and possible aesthetic impacts).

*** Describe all MMs; identify each using standard reference protocol (e.g., MM-AE-1 for additional site-specific measures such as enhanced landscaping to further reduce possible aesthetic impacts).
LOS ANGELES UNIFIED SCHOOL DISTRICT

PROCEDURES FOR IMPLEMENTING

THE CALIFORNIA ENVIRONMENTAL QUALITY ACT

April, 2003
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Section One. Introduction

This document sets forth the Los Angeles Unified School District's objectives, criteria and specific procedures for implementing the California Environmental Quality Act (CEQA), as required by Section 15022 of the State CEQA Guidelines. The document is referred to herein, and may generally be cited as, the "LAUSD CEQA Procedures."

All terms set forth in Initial Capitals in these LAUSD CEQA Procedures are defined in Section Seven below.

Section Two. Incorporation of the State CEQA Guidelines by Reference

The State CEQA Guidelines, 14 California Code of Regulations sections 15000 et seq., are incorporated herein by reference. The balance of this document describes only those procedures necessary to tailor the State CEQA Guidelines' general provisions to the District's specific operations.

To the extent that these LAUSD CEQA Procedures appear to conflict with the State CEQA Guidelines, the State CEQA Guidelines shall prevail.

Section Three. Responsibilities for Implementing CEQA

3.01 Administrative Executives, Directors and Managers

The District acquires, constructs, leases and operates many different types of facilities, including the following:

- schools, such as primary centers, elementary and secondary schools, multilevel schools, magnet schools, special education schools, schools for the disabled, continuation high schools and community adult schools;

- various centers, including children centers, infant centers, magnet centers, opportunity centers, newcomer centers, regional occupational centers, business and industry schools and skills centers;

- administrative offices in a number of different locations;

- school bus garages;

- food manufacturing sites; and

- warehouses.

Depending on the circumstances, activities relating to the acquisition, construction, leasing and operation of these facilities may result in either a direct physical change in the
environment or a reasonably foreseeable indirect physical change in the environment, and are thus potentially subject to CEQA. In addition, certain planning and funding activities for particular activities may be subject to CEQA. Most of the District's activities that are potentially subject to CEQA are undertaken by the Facilities Services Division.

The District's CEQA compliance begins with its Administrative Executives, Directors and Managers. To ensure compliance with CEQA in all phases of the District's operations, each Administrative Executive, Director and Manager, or his or her designee, shall:

(a) consider, at the earliest feasible time, whether proposed activities to be carried out under his or her direction may result in either direct physical changes in the environment or reasonably foreseeable indirect physical changes in the environment;

(b) provide written notification to the CEQA Officer of any activities that may result in direct or reasonably foreseeable indirect physical changes in the environment before taking any steps to implement those proposed activities, except for routine types of activities at existing facilities that the CEQA Officer has previously determined are exempt from CEQA;

(c) obtain one of the following written determinations from the CEQA Officer before taking any steps to implement a proposed activity that may result in direct or reasonably foreseeable indirect physical changes in the environment:

(i) a determination that the proposed activity is not a Project;

(ii) a determination that the proposed activity is a Project but is exempt from CEQA; or

(iii) a determination that the proposed activity is a non-exempt Project and the CEQA process has been completed;

(d) consult with the CEQA Officer during preparation of any CEQA documents relating to activities under his or her direction;

(e) ensure that Mitigation Monitoring or Reporting Programs are adequately and fully implemented for District Projects, where adopted EIRs and Mitigated Negative Declarations assign responsibility for monitoring and/or reporting to personnel working under his or her direction;

(f) provide information and assistance to the CEQA Officer as the CEQA Officer may request in connection with facilities and the District's compliance with CEQA; and

(g) consult with the CEQA Officer in connection with external projects carried out or approved by other agencies that may impact the health or safety of District students and staff, or the physical environment, at District facilities within his or her area of responsibility.
Without limiting the requirements of subsection (b) above, Administrative Executives, Directors and Managers shall notify the CEQA Officer before acquiring real property for any District facilities or for any other purpose. Without limiting the requirements of subsection (c) above, Administrative Executives, Directors and Managers shall obtain from the CEQA Officer one of the determinations identified in subsection (c) before acquiring real property for any District facilities or for any other purpose.

3.02 The CEQA Officer

As permitted by Section 15025 of the State CEQA Guidelines, the Board of Education has delegated to the District's staff most of CEQA's environmental review functions. The Director of the District's Office of Environmental Health & Safety shall serve as the District's CEQA Officer. The CEQA Officer shall provide overall management of the District's CEQA compliance program. In providing this management, the CEQA Officer may delegate authority to perform specific tasks to personnel within the Office of Environmental Health & Safety. The CEQA Officer may also employ and consult with such legal counsel and/or outside consultants as he or she deems necessary or desirable to ensure compliance with CEQA.

In providing overall management of the District's CEQA compliance program, the CEQA Officer or his or her designee shall:

(a) upon written notification from Administrative Executives, Directors or Managers of proposed activities, conduct preliminary review of the activities to determine whether they are subject to CEQA, as described in State CEQA Guidelines Section 15060(c);

(b) determine whether proposed activities subject to CEQA are exempt from CEQA under statutory exemptions and/or Categorical Exemptions;

(c) determine whether District activities subject to CEQA are exempt where it can be said with certainty that there is no possibility of a Significant Effect on the Environment;

(d) determine the appropriate timing of CEQA review;

(e) prepare Initial Studies, either in-house or by contract with outside consulting firms;

(f) consult with and obtain comments from other agencies, including Responsible Agencies, with regard to environmental Effects;

(g) determine whether Projects' Significant Effects will be mitigated to a level of insignificance in Mitigated Negative Declarations;

(h) determine whether Projects may have a Significant Effect on the Environment and therefore require preparation of an EIR;
(i) prepare draft and final Negative Declarations, Mitigated Negative Declarations and EIRs, either in-house or by contract with outside consulting firms;

(j) circulate and file environmental documents with appropriate agencies as required by law, including Negative Declarations, Mitigated Negative Declarations and EIRs;

(k) assure adequate opportunity for public review and comment on Negative Declarations, Mitigated Negative Declarations and EIRs;

(l) evaluate and respond to comments on environmental documents as required by law;

(m) determine whether a Negative Declaration, Mitigated Negative Declaration or EIR is adequate and meets applicable CEQA requirements;

(n) prepare Mitigation Monitoring or Reporting Programs pursuant to State CEQA Guidelines Section 15097 for Mitigated Negative Declarations and EIRs as required by law, either in-house or by contract with outside consulting firms;

(o) designate employees of the Office of Environmental Health & Safety, and/or District staff from other administrative offices or other representatives, to oversee the District's implementation of mitigation measures set forth in Mitigated Negative Declarations and EIRs pursuant to adopted mitigation monitoring or reporting programs;

(p) file notices as may be required by law or otherwise deemed desirable, such as Notices of Exemption, Notices of Preparation, Notices of Availability and Notices of Determination;

(q) assure that all activities under CEQA are completed within the time frames required by law;

(r) for schoolsite acquisition and construction Projects subject to Education Code Section 17213.1, coordinate the CEQA process with the Department of Toxic Substances Control Preliminary Environmental Assessment process as may be required by Section 17213.1(a)(6);

(s) upon notification of proposed external Projects within one-fourth of a mile of an existing District school which might impose a health or safety hazard to persons attending or employed at the school as described in State CEQA Guidelines Section 15186(b), consult with the Lead Agency regarding the potential impact on the school;

(t) establish a review commission as necessary or desirable to identify and resolve general and specific issues as may arise relating to CEQA review of the District's activities;

(u) review and comment upon, as appropriate, external planning documents circulated to the District under CEQA for Projects proposed to be approved or carried out by other agencies that may impose impacts on schools; and
(v) perform such other tasks as are necessary or desirable in fulfilling the District's CEQA responsibilities, other than those delegated to Administrative Executives, Managers and Directors above or reserved to Advisory Bodies or the Board of Education below.

3.03 Advisory Bodies

The Board of Education has established certain standing advisory committees and, from time to time, creates ad hoc advisory bodies on various matters. The Facilities Committee, for example, acts as an advisory body to the Board of Education on facilities matters. Where an advisory body is required to make a recommendation on a Project to the Board of Education, the advisory body shall also review and consider any existing EIR, Mitigated Negative Declaration or Negative Declaration in draft or final form prior to making its recommendation, as required by State CEQA Guidelines Section 15025.

3.04 The Board of Education

The Board of Education, the District's decision-making body, shall:

(a) review and certify final EIRs and approve Negative Declarations and Mitigated Negative Declarations prior to approving Projects;

(b) make the written EIR findings required by State CEQA Guidelines Sections 15091 and 15093 relating to, inter alia, mitigation measures, alternatives and statements of overriding considerations, as applicable; and

(c) make the written finding required by CEQA Guidelines Section 15186(c)(3) relating to existing facilities within one-fourth of a mile of proposed schoolsites which might reasonably be anticipated to emit hazardous emissions or handle hazardous or acutely hazardous materials, substances or waste.

These tasks shall not be delegated to District staff.

Section Four. List of Projects Found to Be Categorically Exempt

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) Operations at Existing Facilities (§ 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 and Reconstruction (§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 (§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 (§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 (§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 (§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 (§15312).** The District has disposed of surplus property and determined that such disposal is exempt from CEQA in particular cases.

(h) **Minor Additions to Schools (§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.

CEQA Officer: The Director of the District's Office of Environmental Health & Safety.

District: The Los Angeles Unified School District.

Mitigation Monitoring or Reporting Programs: Program for monitoring or reporting on mitigation measures as defined in Section 15097 of the State CEQA Guidelines.

Preliminary Environmental Assessment: Also known as a "preliminary endangerment assessment," as defined in California Education Code Section 17210(h).

Notice of Availability: the notice specified by Section 15087(a) of the State CEQA Guidelines.

As used in these LAUSD CEQA Procedures, the following terms with Initial Capitals shall have the meanings as defined in Article 20 of the State CEQA Guidelines, Section 15350 et seq.:

Categorical Exemption
Effects
Environment
Environmental Impact Report, or "EIR"
Initial Study
Lead Agency
Mitigated Negative Declaration
Mitigation
Negative Declaration
Notice of Determination
Notice of Exemption
Notice of Preparation
Project
Responsible Agency
Significant Effect on the Environment
The Office of Environmental Health and Safety is dedicated to providing a safe and healthy environment for the students and employees of the Los Angeles Unified School District.

CALIFORNIA ENVIRONMENTAL QUALITY ACT
INITIAL STUDY
CHECKLIST

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<th>LEAD AGENCY:</th>
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<td>Los Angeles Unified School District</td>
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<th>EXISTING LAND USE DESIGNATION:</th>
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<th>SURROUNDING LAND USES:</th>
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**ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:**

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

- Aesthetics
- Agriculture & Forestry Resources
- Air Quality
- Biological Resources
- Cultural Resources
- Geology & Soils
- Greenhouse Gas Emissions
- Hazards & Hazardous Materials
- Hydrology & Water Quality
- Land Use & Planning
- Mineral Resources
- Noise
- Pedestrian Safety
- Population & Housing
- Public Services
- Recreation
- Transportation & Traffic
- Utilities & Service Systems
- Mandatory Findings of Significance
DETERMINATION

On the basis of this initial evaluation:

☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

☐ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions on the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

☐ I find the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

☐ I find the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

SIGNATURE

DATE

PRINTED NAME

TITLE

EVALUATION OF ENVIRONMENTAL IMPACTS:

1) A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants based on a project-specific screening analysis).

2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.

3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less that significant with mitigation incorporated, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.

4) "Less Than Significant with Mitigation Incorporated" applies where the incorporation of a mitigation measure has reduced an effect from "Potentially Significant Impact" to "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from "Earlier Analysis," as described in (5) below may be cross referenced).
5) Earlier analysis must be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration (CEQA Guidelines section 15063[c][3][D]). In this case, a brief discussion should identify the following:

a) Earlier Analysis Used. Identify and state where they are available for review.

b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.

c) Mitigation Measures. For effects that are "Less Than Significant with Mitigation Measures Incorporated," describe the mitigation measures that were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.

6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.

7) Supporting Information Sources: A sources list should be attached, and other sources used or individuals contacted should be cited in the discussion.

8) The explanation of each issue should identify:

a) The significance criteria or threshold, if any, used to evaluate each question, and

b) The mitigation measure identified, if any, to reduce the impact to less than significance.
 ENVIRONMENTAL IMPACTS

I. AESTHETICS. Would the project:

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

Explanation:

II. AGRICULTURE AND FORESTRY RESOURCES.

In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state’s inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:

   a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use? ☐ ☐ ☐ ☐
   b. Conflict with existing zoning for agricultural use, or a Williamson Act Contract? ☐ ☐ ☐ ☐
   c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220[g]), timberland (as defined by Public Resources Code section 4526) or timberland zoned Timberland Production (as defined by Government Code section 51104[g])? ☐ ☐ ☐ ☐
   d. Result in the loss of forest land or conversion of forest land to non-forest use? ☐ ☐ ☐ ☐
e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?

Explanation:

**III. AIR QUALITY.** Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:

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

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

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

d. Expose sensitive receptors to substantial pollutant concentrations?

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

Explanation:

**IV. BIOLOGICAL RESOURCES.** Would the project:

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

b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?
c. Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

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

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e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance (e.g., oak trees or California walnut woodlands)?

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

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Explanation:

V. CULTURAL RESOURCES: Would the project:

a. Cause a substantial adverse change in significance of a historical resource as defined in CEQA Guidelines section 15064.5?

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b. Cause a substantial adverse change in significance of an archaeological resource pursuant to CEQA Guidelines section 15064.5?

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

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

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e. Cause a substantial adverse change in the significance of a tribal cultural resource as defined in Public Resources Code section 21074?

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Explanation:
VI. GEOLOGY AND SOILS. Would the project:

a. Expose people or structures to potential substantial adverse effects, including the risk of loss, injury or death involving:
   i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.
   ii. Strong seismic ground shaking?
   iii. Seismic-related ground failure, including liquefaction?
   iv. Landslides?

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

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

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

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

Explanation:

VII. GREENHOUSE GAS EMISSIONS. Would the project:

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

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

Explanation:
VIII. HAZARDS AND HAZARDOUS MATERIALS. Would the project:

a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials? □ □ □ □

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

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

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

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

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

g. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan? □ □ □ □

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

Explanation:

IX. HYDROLOGY AND WATER QUALITY. Would the project result in:

a. Violate any water quality standards or waste discharge requirements? □ □ □ □

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

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

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

e. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

f. Otherwise substantially degrade water quality?

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

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

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

j. Inundation by seiche, tsunami, or mudflow?

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### X. LAND USE AND PLANNING

Would the project:

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<tr>
<th>a. Physically divide an established community?</th>
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<td>b. Conflict with applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to, the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?</td>
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<td>c. Conflict with any applicable habitat conservation plan or natural community conservation plan?</td>
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### XI. MINERAL RESOURCES

Would the project:

| a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state? |
| b. Result in the loss of availability of a locally important mineral |

| Explanation: |
resource recovery site delineated on a local general plan, specific plan, or other land use plan?

Explanation:

---

**XII. NOISE.** Would the project result in:

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

b. Exposure of people to or generation of excessive groundborne vibration or groundborne noise levels?

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

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

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

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

Explanation:

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**XIII. PEDESTRIAN SAFETY.** Would the project:

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

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

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

Explanation:
XIV. POPULATION AND HOUSING. Would the project:

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

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

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

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Explanation:

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

a. Fire protection?

b. Police protection?

c. Schools?

d. Parks?

e. Other public facilities?

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<th>Potentially Significant Impact</th>
<th>Less Than Significant with Mitigation Incorporated</th>
<th>Less Than Significant Impact</th>
<th>No Impact</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
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</tbody>
</table>

Explanation:

XVI. RECREATION.

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

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

<table>
<thead>
<tr>
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</table>

Explanation:
### XVII. TRANSPORTATION/CIRCULATION

**Would the project:**

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<tr>
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<th>Potentially Significant Impact</th>
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</tr>
</thead>
<tbody>
<tr>
<td>a.</td>
<td>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?</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
</tr>
<tr>
<td>b.</td>
<td>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?</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
</tr>
<tr>
<td>c.</td>
<td>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?</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
</tr>
<tr>
<td>d.</td>
<td>Substantially increase hazards to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
</tr>
<tr>
<td>e.</td>
<td>Result in inadequate emergency access?</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
</tr>
<tr>
<td>f.</td>
<td>Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
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</tbody>
</table>

**Explanation:**

### XVIII. UTILITIES

**Would the project:**

<table>
<thead>
<tr>
<th></th>
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<th>Less Than Significant Impact</th>
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</tr>
</thead>
<tbody>
<tr>
<td>a.</td>
<td>Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
</tr>
<tr>
<td>b.</td>
<td>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?</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
</tr>
<tr>
<td>c.</td>
<td>Require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
</tr>
<tr>
<td>d.</td>
<td>Have sufficient water supplies available to serve the project from existing entitlements and resource, or are new or expanded entitlements needed?</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
</tr>
<tr>
<td>Potential Impact</td>
<td>Less Than Significant with Mitigation Incorporated</td>
<td>Less Than Significant Impact</td>
<td>No Impact</td>
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<tr>
<td>e. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project’s projected demand in addition to the provider’s existing commitments?</td>
<td>❌</td>
<td>❌</td>
<td></td>
<td></td>
</tr>
<tr>
<td>f. Be served by a landfill with sufficient permitted capacity to accommodate the project’s solid waste disposal needs?</td>
<td>❌</td>
<td>❌</td>
<td></td>
<td></td>
</tr>
<tr>
<td>g. Comply with federal, state, and local statutes and regulations related to solid waste?</td>
<td>❌</td>
<td>❌</td>
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</tr>
</tbody>
</table>

**Explanation:**

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**XXIX. MANDATORY FINDINGS OF SIGNIFICANCE.**

a. Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

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

c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?

**Explanation:**