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CLEVELAND CHARTER HIGH SCHOOL COMPREHENSIVE MODERNIZATION

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Abbreviations and Acronyms

AB	Assembly Bill
AC	asphalt concrete
ACMs	asbestos-containing materials
ANSI	American National Standards Institute
APN	Assessor's Parcel Number
AQMP	Air Quality Management Plan
ARB	California Air Resources Board
BMPs	Best Management Practices
Board	Board of Education
C&D	Construction & Demolition
CAA	Clean Air Act
Cal/OSHA	California Division of Occupational Safety and Health
CALGreen	California Green Building Code
Caltrans	California Department of Transportation
Campus	Cleveland Charter High School
CBC	California Building Code
CDE	California Department of Education
CDFM	Character-Defining Features Memorandum
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CH_4	methane
CHPS	Collaborative for High-Performance Schools
City	City of Los Angeles
Cleveland HS	Cleveland Charter High School
CMP	Congestion Management Plan
CNEL	community noise level equivalent
CO	carbon monoxide
CO_2	carbon dioxide
CO_2e	carbon dioxide equivalent
CRHR	California Register of Historic Resources
CSI	Construction Specifications Institute
dBA	A-weighted decibel
DOT	United States Department of Transportation
DPR	Department of Parks and Recreation
DSA	Division of the State Architect
DTSC	California Department of Toxic Substances Control
EIR	Environmental Impact Report
EMF	electromagnetic field
EPA	United States Environmental Protection Agency
ESA	Environmental Site Assessment
FETU	Facilities Environmental Technical Unit
FTA	Federal Transit Administration
GHGs	greenhouse gases
HABS	Historic American Building Survey
HCP	Habitat Conservation Plan
IS	Initial Study
LADOT	Los Angeles Department of Transportation
LAFD	City of Los Angeles Fire Department
LAPD	City of Los Angeles Police Department
LAUSD	Los Angeles Unified School District
LBP	lead-based paint
L_{eq}	Continuous equivalent level

LID	Low Impact Development
LSTs	Localized Significance Thresholds
MBTA	Migratory Bird Treaty Act
MEP	Maximum Extent Practicable
Metro	Los Angeles County Metropolitan Transportation Authority
MND	Mitigated Negative Declaration
MRZ	Mineral Resource Zone
N_2O	nitrous oxide
NAHC	Native American Heritage Commission
NCCP	Natural Community Conservation Plan
ND	Negative Declaration
NO_X	nitrogen oxide
NPDES	National Pollutant Discharge Elimination System
NRHP	National Register of Historic Places
O_3	ozone
OEHS	Office of Environmental Health and Safety
OHP	California Office of Historic Preservation
OSHA	Occupational Safety and Health Administration
PCB	polychlorinated biphenyls
PDFs	Project Design Features
PM	particulate matter
PM_{10}	particulate matter less than 10 microns in diameter
$PM_{2.5}$	particulate matter less than 2.5 microns in diameter
PPV	peak particle velocity
PRC	Public Resources Code
Project	Cleveland Charter High School Comprehensive Modernization Project
RECs	recognized environmental concerns
RTP/SCS	Regional Transportation Plan/Sustainable Communities Strategy
SC	LAUSD Standard Conditions of Approval
SCAB	South Coast Air Basin
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SEA	Significant Ecological Area
SF_6	sulfur hexafluoride
SLR	single lens reflex
SO_2	sulfur dioxide
SR	State Route
SUP	School Upgrade Program
SUSMP	Standard Urban Stormwater Mitigation Plan
SWPPP	Stormwater Pollution Prevention Plan
TCRs	tribal cultural resources
USFWS	United States Fish and Wildlife Service
VdB	vibration decibel
VOCs	volatile organic compounds

PREFACE TO FINAL INITIAL STUDY/NEGATIVE DECLARATION AND SUMMARY OF OUTREACH EFFORTS

This Final Initial Study/Negative Declaration (IS/ND) has been prepared for the Los Angeles Unified School District (District) Cleveland Charter High School Comprehensive Modernization Project ("project"), located in the Reseda-West Van Nuys Community of the City of Los Angeles, in accordance with the requirements of the California Environmental Quality Act (CEQA).

The potential environmental impacts of the project were previously the subject of a Draft IS/ND, which was made available for public review and comment on September 8, 2017, beginning a 30-day review period that ended October 8, 2017. The Notice of Intent to Adopt an IS/ND included detailed information regarding locations in the community where the IS/ND could be reviewed, as well as electronic access to project documents. Copies of the Notice of Intent to Adopt an IS/ND were directly mailed to parents and/or guardians of students, owners and occupants of properties within a 0.25-mile radius of the project site and were also distributed, via certified mail, to 61 governmental and regulatory agencies, elected officials, community organizations, and other relevant potential stakeholders. The Notice of Intent to Adopt an IS/ND was also posted in the classified section of the *Los Angeles Daily News* and *La Opinion* newspapers, posted in a public location by the Registrar/Recorder of the Los Angeles County Clerk, and displayed at the project site during the public review and comment period. The State of California Governor's Office of Planning and Research Unit (the "State Clearinghouse") submitted copies of the Draft IS/ND to responsible and reviewing agencies.

Comment letters that were received are presented in Appendix L, *Responses to Comments,* of this Final IS/ND, along with the District's responses to each comment. The District, as the CEQA Lead Agency, will submit this Final IS/ND to the Board of Education for certification on October 10, 2017. Text in this Final IS/ND which has been omitted from the Draft ND is presented in ~~strikeout~~, and text which has been added is <u>underlined</u>. Of note, LAUSD Standard Conditions which were already applicable to Cultural Resources have now been applied to Tribal Cultural Resources, as noted Appendix K of this Final IS/ND. Other than minor editorial changes, there are no other substantive edits to the Final IS/ND.

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1. INTRODUCTION

1.1. Overview

The Los Angeles Unified School District (LAUSD) is proposing a comprehensive modernization project at Cleveland Charter High School ("Cleveland HS" or "Campus"), 8140 Vanalden Avenue, Reseda, California. Comprehensive modernization projects are designed to address the critical physical needs of the buildings and grounds at the campus through building replacement, renovations, modernization, and reconfiguration. The proposed Cleveland HS project is required to undergo an environmental review pursuant to the California Environmental Quality Act (CEQA). This Initial Study (IS) provides an evaluation of the potential environmental consequences associated with this project.

1.2. Background

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

On December 10, 2013, the District refined their School Upgrade Program (SUP) to reflect the intent and objectives of Measure Q, as well as the updated needs of LAUSD school facilities and educational goals.[2] Between July 2013 and November 2015, the SUP was analyzed under CEQA criteria in a Program Environmental Impact Report (EIR). On November 10, 2015, the Board certified the Final SUP Program EIR.[3]

On March 10, 2015, the Board approved predesign and due diligence activities necessary to develop project definitions for comprehensive modernization projects at 11 campuses, including Cleveland HS.

On February 9, 2016, the Board approved the project definition for the Cleveland HS Comprehensive Modernization Project ("proposed Project" or "Project. LAUSD proposes to complete the comprehensive modernization Project at Cleveland HS to provide facilities that are safe, secure, and aligned with the instructional program.

The comprehensive modernization Project at Cleveland HS would be completed under LAUSD's SUP. As such, the goals of the Project are consistent with the SUP's goal to build, modernize, and repair school facilities to improve student health, safety, and educational quality as set forth in the SUP Program EIR certified by the Board on November 10, 2015.

1.3. California Environmental Quality Act

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

1 LAUSD Board of Education Report. December 10, 2013. Report Number 143 – 13/14. Subject: School Upgrade Program.
2 LAUSD Board of Education Report. December 10, 2013. Report Number 143 – 13/14. Subject: School Upgrade Program.
3 LAUSD Regular Meeting Stamped Order of Business. 333 South Beaudry Avenue, Board Room, 1:00 p.m., Tuesday, November 10, 2015 (Board of Education Report No. 159 – 15/16).

is the lead agency for this Project; therefore, LAUSD is required to conduct an environmental review to analyze the potential environmental effects associated with the Project.

California Public Resources Code (PRC) Section 21080(a) states that analysis of a project's environmental impact is required for any "discretionary projects proposed to be carried out or approved by public agencies…." In this case, LAUSD has determined that an IS is required to determine whether there is substantial evidence that construction and operation of the proposed Project would result in environmental impacts. An IS is a preliminary environmental analysis conducted by the lead agency (LAUSD), in consultation with other agencies (responsible or trustee agencies, as applicable), to determine whether there is substantial evidence that a project may have a significant effect on the environment and whether an EIR, a mitigated negative declaration (MND), or a negative declaration (ND) is required for a project.[4]

The CEQA statute contains detailed rules governing the content of environmental documents and the environmental review process by State and local agencies. It also provides decision makers and the public with information regarding environmental effects of a proposed project; identifying means of avoiding environmental damage; and disclosing to the public the reasons behind a project's approval even if it leads to environmental impacts. The proposed Project involves discretionary actions; therefore, environmental review in accordance with CEQA is required to assess potential impacts associated with the Project.

When an IS identifies the potential for significant environmental impacts, the lead agency must prepare an EIR;[5] however, if all impacts are found to be less than significant or can be mitigated to less than significant, the lead agency can prepare an ND or MND that incorporates mitigation measures into the project.[6]

1.4. Environmental Process

1.4.1. Environmental Analysis

In November 2015, the LAUSD Board certified the SUP Program EIR (Program EIR), which provides environmental review for the proposed SUP in accordance with CEQA requirements. With a stated objective to repair aging schools and improve student safety, the Program EIR provides the framework for evaluating environmental impacts related to ongoing facility upgrade projects planned by LAUSD. The Program EIR analyzed the impacts of four types of proposed improvements that could be undertaken under the SUP, including:

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

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

The proposed Project is considered a site-specific project under the SUP and analyzed in the Program EIR; therefore, this ND is tiered from the Program EIR. The Program EIR is available for review online at

4 14 CCR Section 15063.
5 14 CCR Section 15064.
6 14 CCR Section 15070.

http://achieve.lausd.net/ceqa and at LAUSD's Office of Environmental Health and Safety, 333 South Beaudry Avenue, 21st Floor, Los Angeles, CA 90017.

1.4.2. Project Plan and Building Design

The Project is subject to the California Department of Education (CDE) design and siting requirements, and the school architectural designs are subject to review and approval by the California Division of the State Architect (DSA). The proposed Project, along with all other SUP-related projects, is required to comply with specific design standards and sustainable building practices. Certain standards assist in reducing environmental impacts, such as the California Green Building Code (CALGreen),[7] LAUSD Standard Conditions of Approval, and the Collaborative for High-Performance Schools (CHPS) criteria.[8]

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

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

Standard Conditions of Approval. LAUSD Standard Conditions of Approval (SCs) are uniformly applied development standards and were adopted by the LAUSD Board in November 2015.[9] The SCs were compiled from established LAUSD standards, guidelines, specifications, practices, plans, policies, and programs, as well as typically applied mitigation measures. The SCs are divided into the 18 LAUSD CEQA environmental topics (Appendix G of the CEQA Guidelines plus Pedestrian Safety).[10] For each SC, compliance is triggered by factors such as the project type, existing conditions, and type of environmental impact. Compliance with every condition is not required.

Mitigation Measures. If, after incorporation and implementation of federal, state, and local regulations; CHPS prerequisite criteria; PDFs; and Standard Conditions of Approval, there are still significant environmental impacts, then feasible and project-specific mitigation measures are required to reduce impacts to less than significant levels. Mitigation under CEQA Guidelines Section 15370 includes:

- Avoiding the impact altogether by not taking a certain action or parts of an action.

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

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

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

10 As of September 2016, an additional environmental topic has since been required by the State Office of Planning and Research (Tribal Cultural Resources). The LAUSD Environmental Checklist now has 19 topics.

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

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

The specific SCs are identified under each CEQA topic.[11] Federal, state, regional, and local laws, regulations, plans, and guidelines; CHPS criteria; PDFs; and SCs are considered part of the project and are included in the environmental analysis.[12]

1.4.3. Negative Declaration and Supporting Initial Study

This IS was prepared to determine if the proposed Project would have a significant impact on the environment. The purpose of the IS is to (1) provide the lead agency with information to use as the basis for deciding the proper type of CEQA document to prepare; (2) enable the lead agency to modify a project, mitigating adverse impacts before an EIR is prepared, thereby enabling the project to qualify for an ND; (3) assist in the preparation of an EIR, if one is required; (4) facilitate environmental assessment early in the design of a project; (5) provide documentation of the factual basis for the findings in an MND or ND; (6) eliminate unnecessary EIRs; and (7) determine if the project is covered under a previously prepared EIR.[13]

1.4.4. Impact Terminology

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

- A finding of ***no impact*** is appropriate if the analysis concludes that the project would not affect the particular topic area in any way.
- An impact is considered ***less than significant*** if the analysis concludes that it would cause no substantial adverse change to the environment and requires no mitigation.
- An impact is considered ***less than significant with mitigation incorporated*** if the analysis concludes that it would cause no substantial adverse change to the environment with the inclusion of environmental commitments or other enforceable mitigation measures.
- An impact is considered ***potentially significant*** if the analysis concludes that it could have a substantial adverse effect on the environment. If any impact is identified as potentially significant, an EIR is required.

1.5. Organization of the Initial Study

The content and format of this report are designed to meet the requirements of CEQA and the State CEQA Guidelines. The conclusions in this IS are that the proposed Project would have no significant impacts with the incorporation of mitigation. This report contains the following sections:

Chapter 1, *Introduction,* identifies the purpose and scope of the ND and supporting IS and the terminology used.

[11] CHPS criteria are summarized. The full requirement can be found at http://www.chps.net/dev/Drupal/California.
[12] Where the LAUSD Standard Conditions of Approval identifies actions to be taken, it is understood that the Project proponent would implement all LAUSD actions for this Project.
[13] 14 CCR Section 15063.

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

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

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

Chapter 5, ***List of Preparers,*** identifies the individuals who prepared the ND and supporting IS and technical studies and their areas of technical specialty.

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

A. Air Quality Technical Report

B. Tree Inventory and Preservation Report

C. Character Defining Features Memorandum (Cultural Resources Evaluation)

D. Preliminary Geotechnical Report

E. Phase I Environmental Site Assessment

F. Noise Study Technical Report

G. Traffic Study Technical Memorandum

H. EMF Survey

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2. ENVIRONMENTAL SETTING

2.1. Project Location

The proposed Project is located at LAUSD's Cleveland HS campus, at 8140 Vanalden Avenue (Assessor's Parcel Number [APN] 2104-004-905) in the Reseda-West Van Nuys Community Plan Area of the City of Los Angeles (the "City"). Figure 1, Regional Vicinity Map, shows the regional and site location. Figure 2, Existing Site Plan, provides a site plan of the existing buildings and campus. Figure 3, Proposed Project Site Plan, shows the site plan with the proposed Project improvements.

The Project site is located approximately 25 miles northwest of downtown Los Angeles in a suburban residential area and approximately 7 miles to the east of the Los Angeles County/Ventura County boundary. Cleveland HS is approximately 37 acres and is bordered on the north by Roscoe Boulevard, on the east by Aliso Canyon Wash and the Los Angeles Department of Water and Power multi-circuit 230 kV overhead transmission line, on the south by Strathern Street, and on the west by Vanalden Avenue.

2.2. Campus History

The first plans for Cleveland HS were drawn by Charles O. Matcham, Stewart S. Granger and Associates, Architects and Engineers, in December 1957. The school was constructed on an irregularly shaped lot, with most of the school buildings located at the north end of the property. The school was laid out in essentially a finger plan, with a main arcade serving as the primary artery connecting a series of buildings on either side of a covered walkway. The wider southern end of the lot was primarily devoted to outdoor sporting activities. Cleveland HS was constructed in phases, spreading construction of the buildings around the arcade over several years and continuing into the late 1960s. The first phase of construction, circa 1957 to 1958, resulted in establishment of the site plan and layout of the entire campus and the design. Phases 2 and 3 were detailed in architectural drawings dated April 1958 and July 1958, respectively[14].

A fire in the early 1980s required repairs to the Administrative Building (Building 6). In 1988, Gensler and Associates/Architects designed a new community indoor swimming pool. In the aftermath of the 1994 Northridge earthquake, several measures were taken to stabilize and repair various school buildings between 1995 and 1996. Earthquake repair occurred throughout the campus, including to the Physical Education Building (Building 21), arcades, multiple classroom buildings, the Greenhouse, Student Store (Building 15), Cafeteria (Building 14), and Administrative Building (Building 6). Repairs were also made to the hardscape and athletic fields. As part of this work, the Agricultural Shed was demolished[15].

The Cleveland HS campus was found eligible for the National Register of Historic Places (NRHP) and California Register of Historic Resources (CRHR) through a survey evaluation. It was determined to qualify as a Historic District. The contributing elements of the district were defined as the complex of buildings and structures that form the campus core, specifically consisting of the site plan and landscape elements. This high school was found to be a good example of a finger- and cluster-designed campus, which is characterized by pavilion-like classroom wings "clustered" around courtyards with axial classroom wings connected by a central corridor. In addition to this historic plan, the following buildings were found to be contributing components to the district: Classroom Building 1; Library Building 2; Classroom Building 3; Administrative Building 6; Classroom Buildings 7 through 10, Buildings 4 and 5; Building 11; Building 13; Multi-Purpose Building 12, Student Store Building 15, Classroom Building 18; Building 16; Building 17; Classroom Building 20; and Physical Education Building 21.

[14] PCR Services Corporation. Character-Defining Features Memorandum (CDFM) for Grover Cleveland High School, 8140 Vanalden Avenue, Reseda, CA 91335 (July 2015).

[15] Ibid.

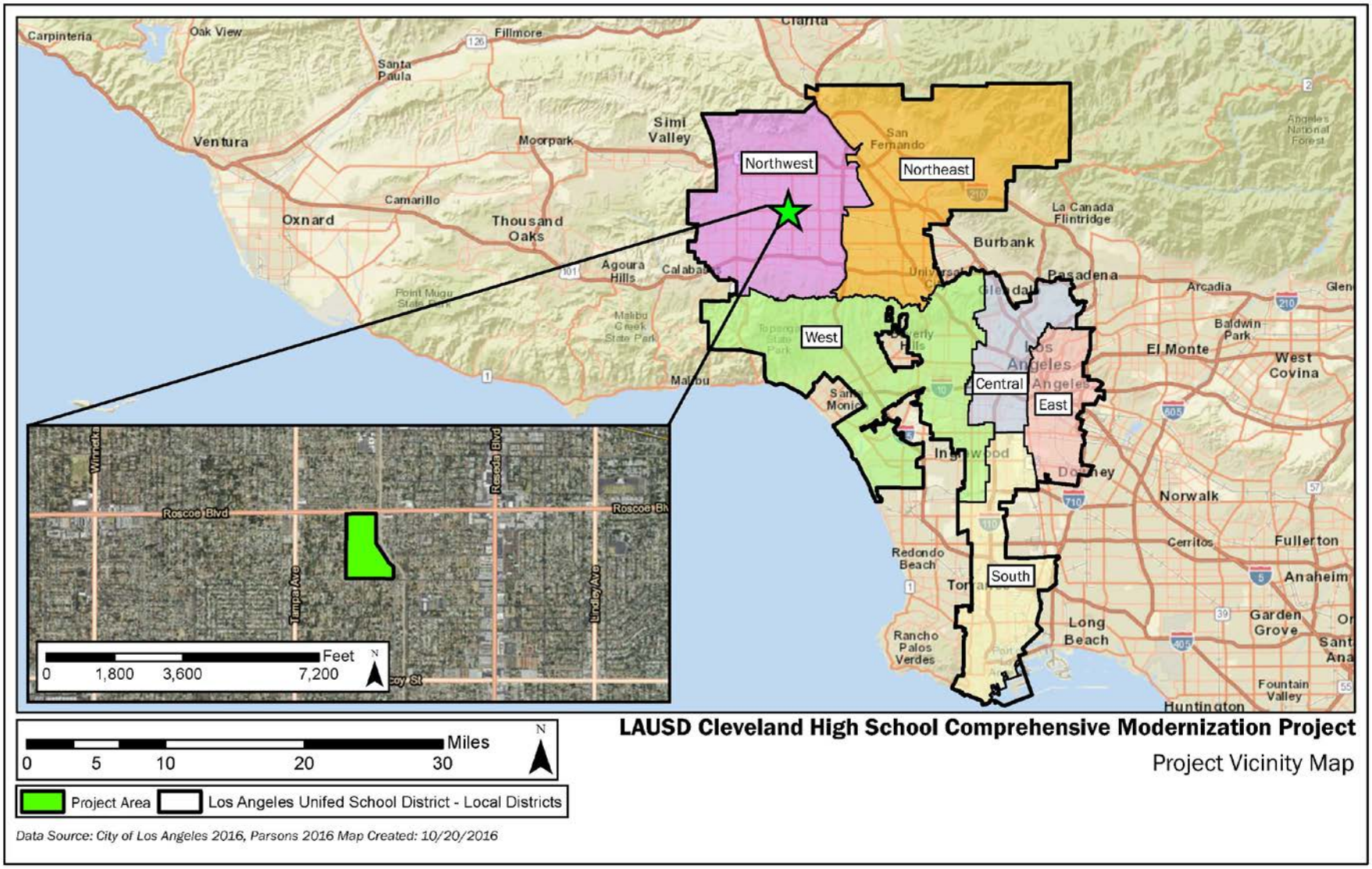


Figure 1 – Regional Vicinity Map

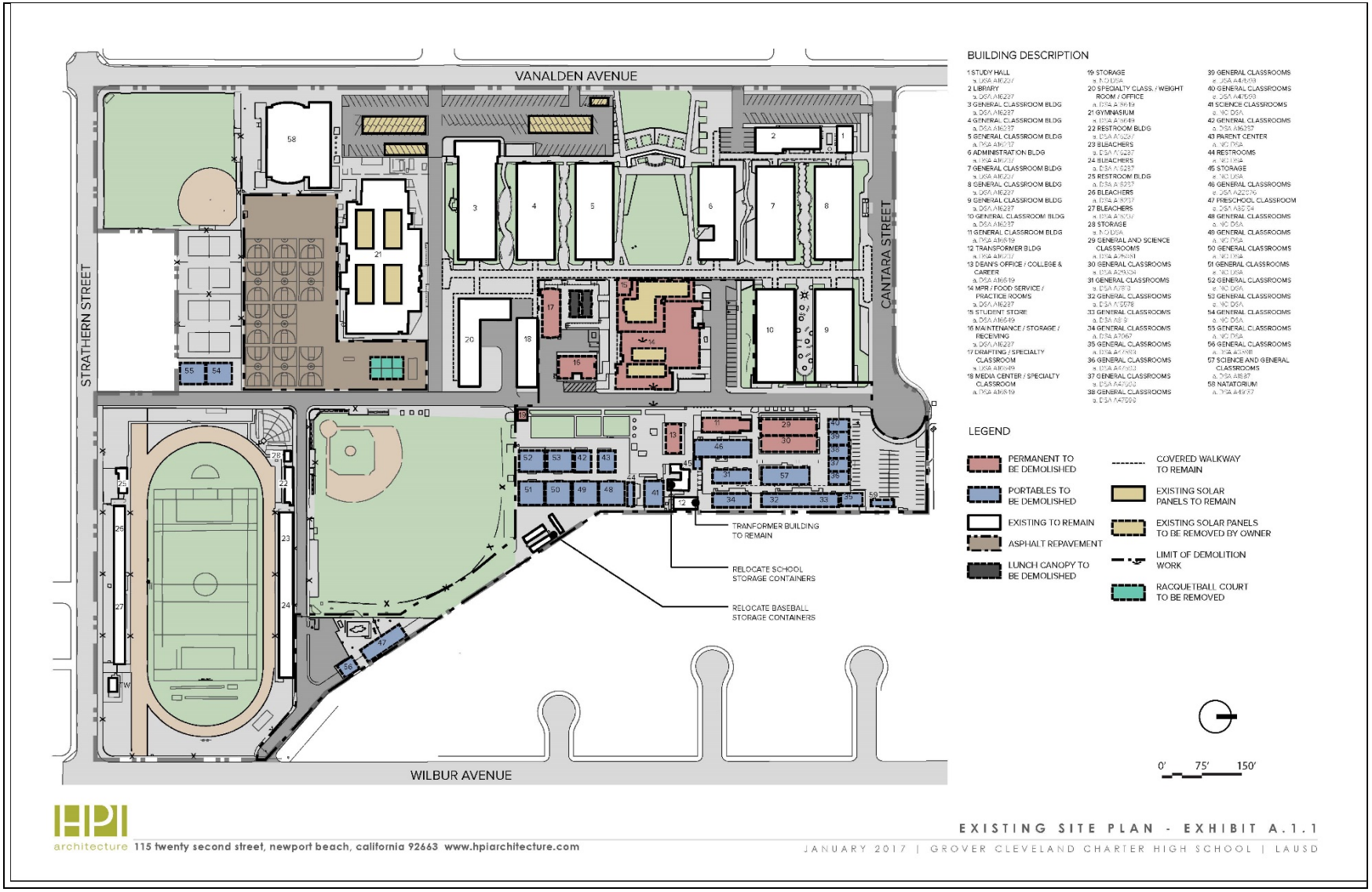


Figure 2 – Existing Site Plan

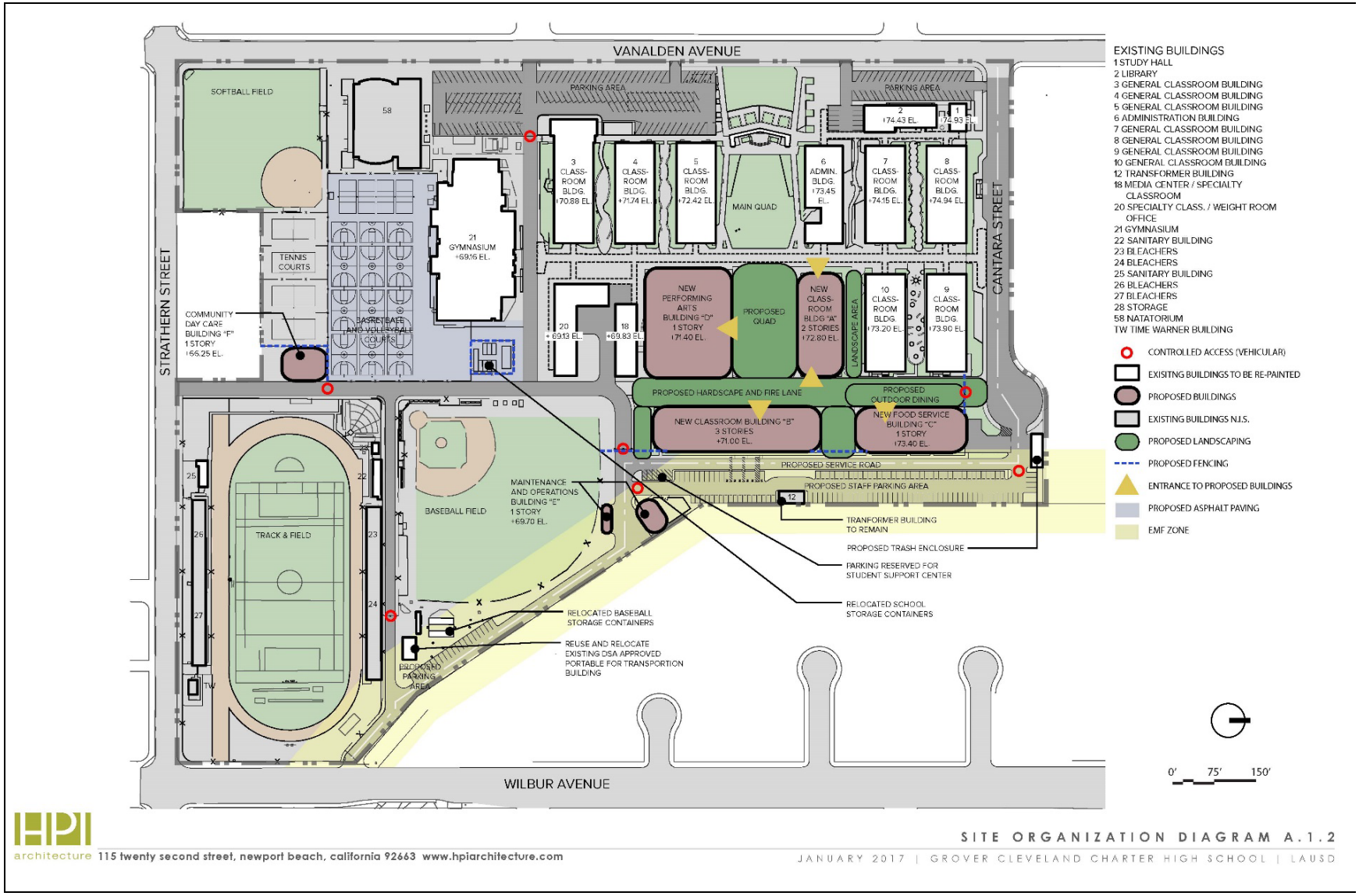


Figure 3 – Proposed Project Site Plan

2.3. Surrounding Land Use

Cleveland HS is located within the Reseda-West Van Nuys Community Plan Area of the City of Los Angeles. According to the City of Los Angeles Local Population and Housing Profile for the Reseda-West Van Nuys Community Plan Area, the community contains a population of 112,197 persons (2014 estimates) and is approximately 12.077 square miles in size. The area is urbanized and is primarily comprised of low-density single-family residential land uses. Single-family residences comprise most of the land use located north, south, and west of the school parcel. An existing electrical transmission corridor and Aliso Canyon Wash are located east of the campus.

Regional transportation facilities serving the Project vicinity include the San Diego Freeway (I-405), located approximately 4 miles east of the Project site and accessed by Roscoe Boulevard; the Ronald Reagan Freeway (State Route [SR] 118), located 4 miles north of the Project and accessed by Tampa Avenue; and Ventura Freeway (US 101), located approximately 3 miles south of the Project site and accessed by Reseda Boulevard or Tampa Avenue.

2.4. Existing Conditions

Cleveland HS is situated in a mainly residential neighborhood with some commercial development along Roscoe Boulevard. The school's facilities include permanent and portable buildings, athletic fields, and landscape and hardscape areas. Cantara Street, a private street within the campus, runs east-west between the northern portion of the campus and the Miller Career and Transition Center. An access route is situated north-south from Cantara Street through the campus to Strathern Street.

The school has a planned enrollment of 3,200 students in 9th through 12th grade. Two additional schools share the site with Cleveland HS: The Cleveland HS Early Education Center occupies a small separate area at the south end of the site; and the Joaquin Miller Career and Transition Center is located just north of the access road, along Roscoe Boulevard. The swimming pool, used jointly by the school and the community, occupies the southwest corner of the site.

The Preliminary Environmental Assessment Equivalent identified six areas where lead, arsenic, or trichloroethene concentrations exceeded screening levels. Impacted soil was removed and transported to an authorized landfill in April 2017.[16]

2.5. General Plan and Existing Zoning

The Project site is zoned [Q]PF-1XL (Public Facilities) and has a corresponding General Plan land use designation of Public Facilities.[17] [Q] means additional restrictions on building design, landscape buffer, signs, etc. '1' is Height District No.1 and XL is Extra Limited Height District where no building or structure shall exceed two stories, nor shall the highest point of the roof of any building structure exceed 30 feet in height.[18]

The California legislature granted school districts the power to exempt school property from local zoning requirements, provided the school district complies with the terms of Government Code Section 53094.[19] As

[16] Pinnacle Environmental technologies. 2017. Grover Cleveland Charter High School, Technical Memorandum on Housekeeping Activities.

[17] City of Los Angeles, 2016. NavigateLA Website Accessed November 2016 - http://navigatela.lacity.org/navigatela/.

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

[19] 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.

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

(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 PRC, 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 non-classroom 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).

3. PROJECT DESCRIPTION

Cleveland HS is one of the top-performing charter high schools in LAUSD. The sought-after Humanities Magnet and Small Learning Communities consist of many technologically oriented programs such as the Academy of Art and Technology and Global Academy of Interdisciplinary and Media Studies. These programs emphasize visual design for print and web, as well as social media, art, and film, which draws in a highly diverse student population. This comprehensive modernization Project would allow the specialized programs offered at Cleveland HS to better integrate with other complementary programs. The culmination of this work would bring Cleveland HS into a 21st century learning environment. Cleveland HS's mission is to nurture global citizens who pursue academic excellence, realize personal success, and demonstrate social responsibility.

3.1. Proposed Project

The proposed Project includes demolition, repurposing, new construction, cosmetic upgrades, and site improvements to the existing campus. The proposed Project includes the removal of nine permanent and 28 portable buildings, replacing deteriorated utility lines, and relocating existing storage units and hardscape. The existing buildings noted for demolition do not meet the requirements of the school or the minimum LAUSD standards. Currently, there are inadequate or nonexistent performing arts spaces, including theater, dance, choral, and music. Similarly, the existing science labs are undersized and lack the equipment necessary to teach 21st century science. Under LAUSD's goal to reduce the number of students using temporary facilities, portable buildings would be removed. This would also improve student safety and wayfinding on campus.

The demolished school buildings would be replaced by seven new buildings: Building A (a two-story General Classroom Building); Building B (a three-story General and Science Classroom Building); Building C (a one-story Food Service Building); Building D (a one-story Performing Arts Center and Student Store); Building E (Maintenance and Operations Building), Building F (Community Day Care), and Building G (Transportation Building). Also included in this proposed Project are site utilities infrastructure upgrades; new asphalt paving for physical education play courts; parking; landscape and hardscape areas; pedestrian/energy service road rerouting to join Wilbur Avenue and Cantara Street (private); and conversion of a portion of the old service road into a pedestrian spine. In addition, the existing buildings would require different levels of modernization, including exterior repainting, programmatic access, and complete interior remodeling.

The school has no plan to increase the enrollment beyond the planned enrollment capacity.

3.1.1. Facilities

Specifically, the proposed Project would include the following changes to the campus, as shown in Table 1 and Figure 3.

Table 1 – Proposed Project (Demolition, Remodel, and Construction)

Bldg. No.	Building	Demolition	Remodel/ Modernization	New Construction	Existing to Remain
1	Study Hall				1,547
2	Library				7,766
3	Arts Classrooms				16,631
4	Classrooms		12,354		584
5	Classrooms		12,052		1,365
6	Administration				11,652
7	Classrooms				12,071
8	Classrooms				12,072
9	Classrooms				12,996
10	Classrooms				12,532
11	Classrooms	2,644			
13	Dean's Office	1,704			
14	MPR-Food Service	23,848			
15	Student Store	842			
16	Utility	2,988			
17	Drafting	3,187			
18	Media Center				6,998
19	Storage	360			
20	Classrooms				11,987
21	Physical Education		17,756		21,352
22	Restrooms				1,101
25	Restrooms				779
28	Storage				360
29	Classrooms	6,166			
30	Classrooms	6,165			
31	Portable Classrooms	1,812			
32	Portable Classrooms	1,728			
33	Portable Classrooms	1,728			
34	Portable Classrooms	1,728			
35	Portable Classrooms	864			
36	Portable Classrooms	864			
37	Portable Classrooms	864			
38	Portable Classrooms	864			
39	Portable Classrooms	864			
40	Portable Classrooms	864			
41	Portable Classrooms	1,435			
42	Portable Classrooms	957			
43	Portable Classrooms	957			
44	Portable Toilets	480			
45	Portable Storage	80			

Table 1 – Proposed Project (Demolition, Remodel, and Construction)

Bldg. No.	Building	Demolition	Remodel/ Modernization	New Construction	Existing to Remain
46	Portable Classrooms	2,891			
47	Portable Daycare/Child Development Center	2,378			
48	Portable Classrooms	1,914			
49	Portable Classrooms	1,914			
50	Portable Classrooms	1,914			
51	Portable Classrooms	1,914			
52	Portable Classrooms	1,914			
53	Portable Classrooms	1,914			
54	Portable Classrooms	1,914			
55	Portable classrooms	1,914			
56	Portable Classrooms	900			
57	Portable Classrooms	2500			
59	Transportation Portable	479			
	Building A and B Classrooms			88,429	
	Building C Food Service			25,320	
	Building D Arts Building			31,048	
	Building E Maintenance and Operations			3,506	
	Building F Child Development Center			2,472	
	Building G			989	
	Campus Total* (does not include outdoor space)	88,453	42,162	151,763	131,792

Note: All numbers are in square feet. All new square footages are approximate and subject to change during final site and architectural planning and design phases. These square footage changes would not significantly change the environmental analysis or findings in this IS.

* Square footage totals may not add up exactly due to rounding and the way usable space is calculated. All numbers are based on LAUSD Cleveland Charter High School Comprehensive Modernization Project – Space Program. March 14, 2017.

Current total square footage = Existing + Remodel + Demolition (262,407). After project square footage = Existing + Remodel + New (325,717). Increase in campus square footage = 63,310 sq ft

Building Demolition

Permanent buildings:

- Building 11 Classroom Building
- Building 13 Dean's Office/College & Career
- Building 14 Multi-Purpose, Food Service and Practice Rooms (Drama, Music, Choral, etc.)
- Building 15 Student Store
- Building 16 Maintenance, Storage, Receiving
- Building 17 Drafting, Specialty Classroom
- Building 19 Storage Building
- Building 29 General and Science Classroom Building
- Building 30 General Classroom Building

Modular Buildings:

- Building 31 General Classroom Building
- Building 32 General Classroom Building
- Building 33 General Classroom Building
- Building 34 General Classroom Building
- Building 35 General Classroom Building
- Building 36 General Classroom Building
- Building 37 General Classroom Building
- Building 38 General Classroom Building
- Building 39 General Classroom Building
- Building 40 General Classroom Building
- Building 41 Science Classroom Building
- Building 42 General Classroom Building
- Building 43 Parent Center
- Building 44 Restroom Building
- Building 45 Storage Building
- Building 46 General Classroom Building
- Building 47 Preschool Classroom Building
- Building 48 General Classroom Building
- Building 49 General Classroom building
- Building 50 General Classroom Building
- Building 51 General Classroom Building
- Building 52 General Classroom building
- Building 53 General Classroom Building
- Building 54 General Classroom Building
- Building 55 General Classroom Building
- Building 56 General Classroom building
- Building 57 General Classroom Building
- Building 59 Transportation Building

New Construction

- Building A General Classroom Building
- Building B General and Science Classroom Building
- Building C Food Service Building
- Building D Performing Arts Building
- Building E Maintenance and Operations Building
- Building F Community Day Care
- Building G Transportation Office Building

Remodel and Modernization

- Building 4 Reconfigured and modernized
- Building 5 Reconfigured and modernized
- Building 21 Seismic retrofit and modernization

Site Upgrades

- Sitewide infrastructure, including plumbing, electrical, and storm drain
- Sitewide upgrades to remove barriers to program accessibility
- Landscape, hardscape, and exterior paint
- New asphalt paving for Physical Education play courts, parking, and access

Interim housing facilities would be used to ensure the campus is fully functional during each phase of construction. The interim housing will meet LAUSD and DSA Standards.

3.1.2. Access, Circulation, and Parking

Existing Pedestrian Access

The primary pedestrian access into the campus is located at the north edge along Vanalden Avenue, where there are multiple egress gates in addition to entry at the Administration Building. Access is also located on the north side of the campus along Cantara Street. Cantara Street provides student access to a covered walkway from a vehicular drop-off/pick-up zone. A secondary pedestrian access point is also provided at the southern edge of Strathern Avenue. Many students arriving or departing on foot utilize the crosswalks at Vanalden Avenue and Roscoe Boulevard.

With so many students using these crosswalks, campus administration and faculty have expressed safety concerns due to the potential for pedestrian and vehicular conflicts (see checklist topic Pedestrian Safety XIIIa). Pedestrian access that currently occurs along the existing service road would shift to the proposed hardscape and fire lane areas adjacent to the new buildings, proposed quad, and outdoor dining area.

New Pedestrian Spine

The existing pedestrian spine is located in the northeast part of the campus, shown in Figure 2. It will be extended from existing Building 18 on the south to Cantara Street on the north (Figure 4). The proposed performing arts center, the new two-story classroom building, and existing Buildings 9 and 10 are to the west. The proposed three-story classroom building and food service/multi-purpose building are to the east. The area is approximately 650 feet in length and 40 feet wide. This corridor also provides emergency vehicle and service access.

The pedestrian spine will provide a strong north-south pedestrian link to the campus. The courtyards between the existing buildings are tied to the new area with connecting walks to the north-south pedestrian spine. The south part of the pedestrian spine will engage and link to the Performing Arts Center Plaza.

Existing Vehicular Access

The primary entrance is located off Vanalden Avenue, giving access to three parking lots within the campus. An "L shaped" interior service road, Cantara Street, connects Vanalden Avenue and Strathern Street. Cantara Street provides access for bus (for both Cleveland HS and the Joaquin Miller Career and Transition Center north of the campus), emergency, and delivery vehicles, as well as teacher/staff parking located internal to the site. An onsite road from Wilber Avenue provides access to the sports field and the Community Day Care, located on the eastern edge of the site along the transmission easement. The Humanities Magnet has a significant number of students who arrive and depart via bus and/or private parent-provided transportation.

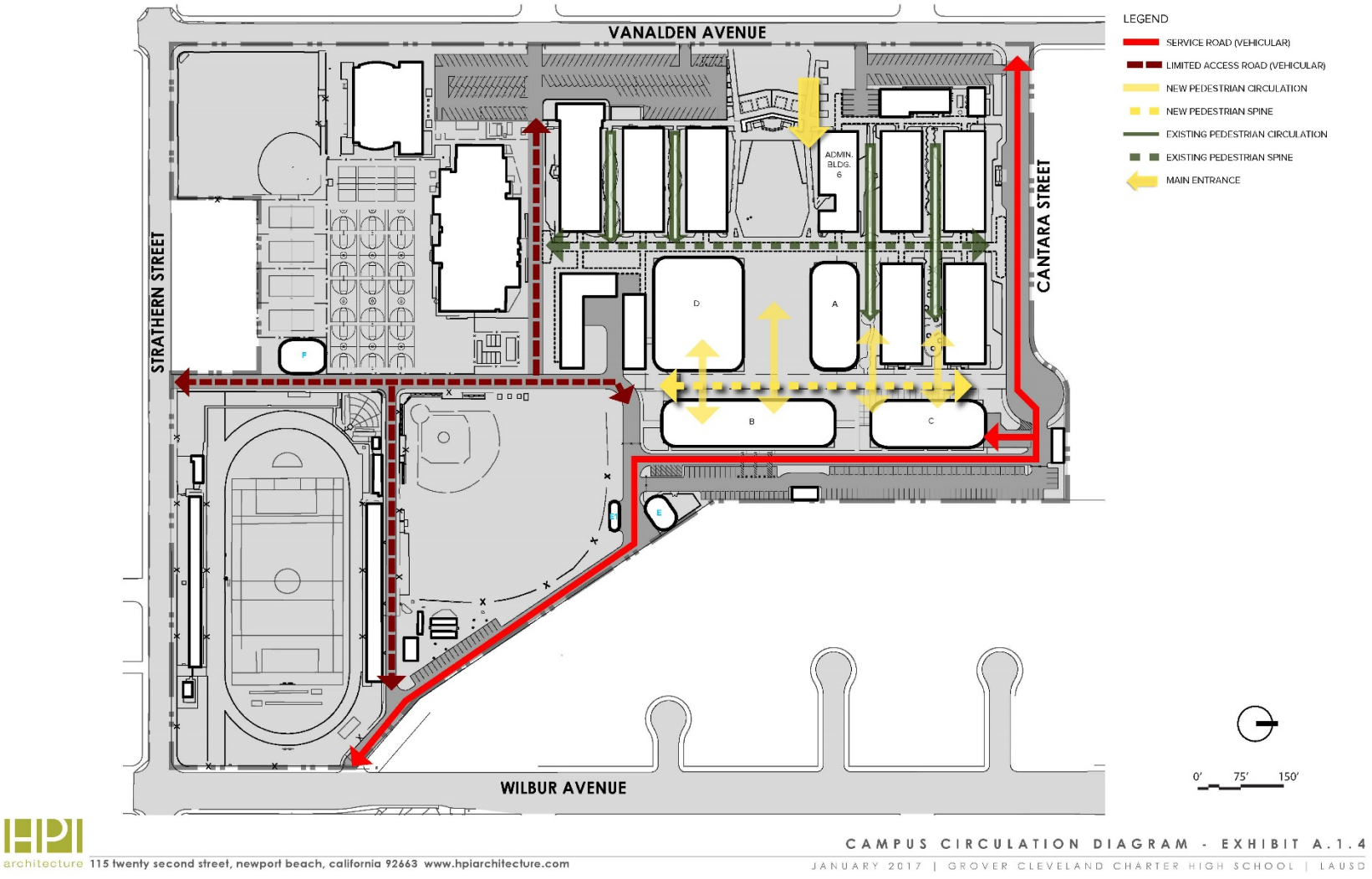


Figure 4 – Campus Circulation Site Plan

Bus drop-off occurs along Cantara Street. Circulation for school buses exiting the school facilities runs from Cantara Street along the existing service road toward the Wilbur Avenue exit, east of the track and baseball fields. Parent drop-off occurs primarily within the neighborhood and along Vanalden Avenue and Cantara Street. Parents dropping off or picking up along Cantara Street generally exit the site via the campus service road to Strathern Street. These circulation patterns result in the following issues: (1) The existing service road splits up within the campus, creating opportunities for vehicular and pedestrian conflicts; and (2) at peak periods, safety conflicts exist between students traversing to corner crosswalks; parent pick-up and drop-off along Vanalden Avenue; parking lots located along Vanalden Avenue; and access to Cantara Street.

New Service Road

The new service road would be relocated east of the new buildings and along the eastern property boundaries. Limited vehicular access would run along the existing access road near the track and baseball fields (toward Wilbur Avenue), the gymnasium (toward Strathern Street), and near Building Nos. 3 and 20 (toward Vanalden Avenue).

Parking

There are currently 256 parking stalls available onsite. The LAUSD parking standard for high schools of 2.5 stalls per classroom requires a minimum of 305 parking stalls at Cleveland HS. The reconfigured parking for the proposed Project is shown in Figure 4. With the proposed Project, all existing interior parking lots would be demolished, thereby reducing the potential for vehicular and pedestrian conflicts. New parking areas will be constructed along the new service road, increasing the total parking available for the campus.

Student Drop-Off/Pick-Up Areas

The existing parent-designated student drop-off/pick-up area occurs at the front edge of the school at Vanalden Avenue. This creates traffic congestion and conflict issues with staff parking lots located at Vanalden Avenue. The bus drop-off/pick-up area for Cleveland HS and the Joaquin Miller Career and Transition Center occurs along Cantara Street.

3.1.3. Landscaping

The campus is comprised of multiple outdoor courtyards and covered walkways connecting the original buildings. The centralized lawn and the open spaces between the original buildings support student interaction and learning. Many of these spaces have been updated within the past 5 years as part of Small Learning Community Modernization efforts of LAUSD.

The landscape improvements as part of the proposed Project would support the mission of the architectural improvements with sustainable outdoor spaces suitable for circulation, learning, collaboration, and dining. The new landscape design would provide additional spaces for student gathering and learning.

New landscaping would be installed within the proposed quad, hardscape, and landscape areas. The proposed open spaces and landscape areas are shown in Figure 3 and would include the following:

- Performing Arts Center Plaza
- Pedestrian spine
- Student outdoor dining
- Faculty outdoor dining
- Enhancements between new buildings and at new parking lots

Landscape and hardscape materials used for the proposed improvements would complement existing campus materials, as well as the new building architecture. All landscape plantings would consist of sustainable, drought-tolerant shrubs, trees, and vines. The plant materials would be chosen from the LAUSD Approved Plant List. Consideration would be taken to use low-maintenance vegetation and to consider student path of travel where

there is a potential of students walking through vegetation areas (vegetation should be resilient enough to withstand some foot traffic). All new landscaped areas would be designed with LAUSD-approved irrigation components.

Proposed Tree Removals

An Arborist Tree Report was prepared that includes an inventory, assessment, and proposed disposition of existing trees in the Project area (see Appendix B). Sixty-three (63) trees are growing around the plan area at Cleveland HS, including a number of pines, tulip trees, sweet gum, and palms. There is also a good collection of citrus varieties. Their sizes, health, and structural condition are provided in the Arborist Tree Report. As shown in the tree removal plan (see Figure 5), the proposed Project would remove 46 trees due to building construction, 10 trees due to poor health, and protect seven trees in place. No trees protected under the City tree protection ordinance are located on the campus. Replanting will occur as part of the overall landscape plan discussed above to account for the trees being removed as part of the proposed Project.

3.1.4. Site Security and Safety

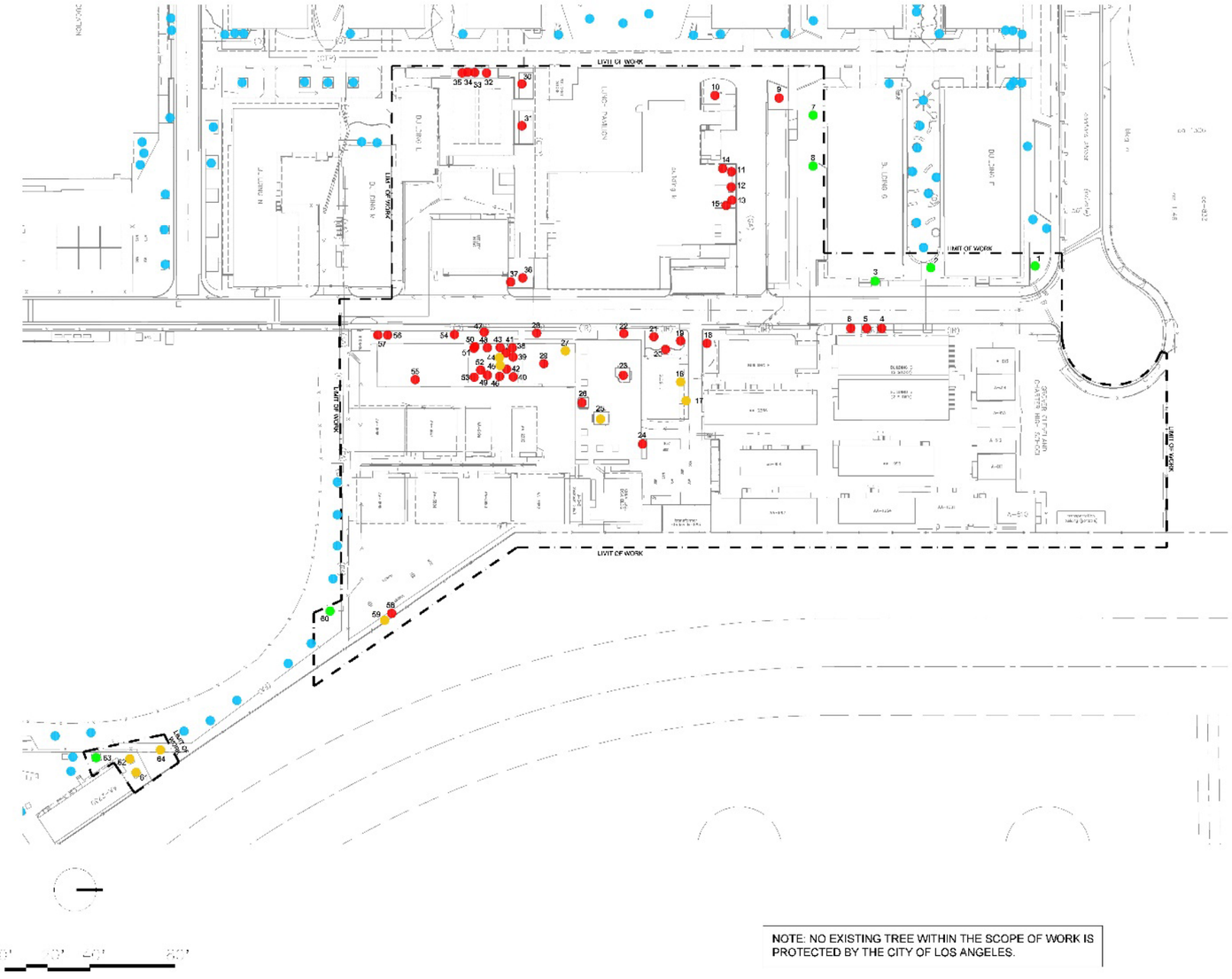
Controlled access for vehicular traffic is proposed north of the proposed outdoor dining area, an access point between Classroom Building "B" and the baseball field, and at the two ingress/egress points of the new staff parking along the northeast area of the campus (see Figure 3). New controlled-access bollards and systems are proposed and would be further developed by the design-build team. Site lighting would consist of a hierarchy of lights with building soffit-mounted lights, plaza area post-top lights, and pathway lighting.

3.2. Construction Schedule

Demolition of the existing buildings affected by the proposed Project is scheduled to commence during the fall/winter (fourth quarter) of 2018 and would last for approximately 3 to 4 months. After demolition and site preparation work is completed, construction of the new buildings would commence concurrently. Construction of the new school buildings would last for approximately 36 months and is anticipated to be completed by late 2021. Table 2 summarizes the proposed construction activities and schedule for implementation of the proposed Project.

Table 2 – Project Schedule

Construction Phase	Schedule Timeframe
Environmental Process	Winter 2017 to Summer 2017
Preconstruction Activities	Winter 2017 to Spring 2018
Award Construction Contract	Summer 2018
Construction	Winter 2018
Project Completion	Winter 2021



TREE DISPOSITION LEGEND

- 1 TO BE REMOVED DUE TO PROPOSED GRADIENT OR BUILDING STRUCTURE CONSTRUCTION
- 2 TO BE REMOVED DUE TO POOR HEALTH
- 3 TO BE PROTECTED IN PLACE
- TREES NOT IN SCOPE

Tree #	Species	DBH	Ht.	Structure	Health	Disposition 1-3	COMMENTS
1	Pinus canariensis	19	55	A	A	1	Mid-tree asymmetry
2	Magnolia grandiflora	8	35	A	A	1	Several dead ledges
3	Callistemon viminalis	15	22	D	C	1	Dead limbs, base damage
4	Liquidambar styraciflua	18	45	C	A	1	Codominant trunks
5	Liquidambar styraciflua	8	25	C	C	3	DWC called
6	Liquidambar styraciflua	10	27	C	A	1	Cut
7	Liquidambar styraciflua	36	80	A	A	1	Cut / topped
8	Liquidambar styraciflua	5	25	C	B	3	Cut
9	Liquidambar styraciflua	5	22	B	C	1	Cut / called
10	Pinus halepensis	30	80	C	C	3	Cut / some dead
11	Callistemon viminalis	15	20	C	C	1	Cut / some dead limbs / DWC
12	Casuarina cunninghamiana	8	24	C	C	3	Poor form, co-dominant trunks, DWC
13	Liquidambar styraciflua	19	50	B	C	1	Cut / dead limbs, DWC
14	Casuarina cunninghamiana	10	40	A	C	1	Cut / some DWC
15	Liquidambar styraciflua	3	35	C	C	3	DWC
16	Pinus canariensis	27	60	C	A	1	Cut / dead
17	Acer campestre	33	35	A	C	2	Cut / dead limbs / DWC
18	Acer palmatum	12	30	B	B	3	Dead / decayed / DWC
19	Eucalyptus polybractea	46	120+	A	C	1	Mid-tree cavity / girdling roots
20	Liquidambar styraciflua	22	50+	B	B	3	Cut / DWC
21	Liquidambar styraciflua	26	50	C	B	1	Cut / DWC / trunk wounds
22	Pinus canariensis	20	55	C	C	3	Cut / DWC / trunk wounds / DWC
23	Pinus canariensis	50	85	C	C	3	Cut / topped / mid-tree cavity
24	Eucalyptus	24+	80	C	A	1	Cut
25	Pinus canariensis	26	70	C	C	2	Declining / mid-tree cavity / DWC / dead
26	Pinus canariensis	24	60	B	B	1	Cut / some DWC
27	Eucalyptus polybractea	22+	80	A	C	2	Cut / dead limbs / DWC / mid-tree cavity
28	Liquidambar styraciflua	6 & 7 & 8	35	D	B	3	Multi-trunk / cavity / DWC
29	Callistemon viminalis	11	20	C	A	1	Cut / some DWC
30	Liquidambar styraciflua	34	80	C	B	3	Cut / DWC
31	Liquidambar styraciflua	17	45	C	B	1	Cut / DWC
32	Casuarina cunninghamiana	8	40+	C	C	3	Cut / DWC / DWC
33	Casuarina cunninghamiana	5	30+	D	C	1	Cut
34	Casuarina cunninghamiana	5	40+	C	C	1	Cut
35	Casuarina cunninghamiana	5	30+	D	C	1	Cut
36	Liquidambar styraciflua	20	45	D	C	1	Mid-tree cavity / DWC
37	Pinus canariensis	8 & 9	30	C	C	3	Cut / DWC / DWC / DWC
38	Citrus x paradisi	5	11	C	C	3	Cut / DWC / DWC
39	Acacia baileyana	8	14	C	C	1	Cut / DWC / DWC
40	Citrus x paradisi	8	12	C	C	3	Cut / DWC / DWC
41	Citrus x paradisi	7	9	C	C	1	Cut / DWC / DWC
42	Citrus limon	6	9	C	C	3	Cut / DWC
43	Citrus x paradisi	9	9	C	C	1	Cut / DWC / DWC
44	Citrus x paradisi	9	10	C	C	1	Cut / DWC / DWC
45	Citrus x paradisi	8	12	C	C	3	Cut / DWC
46	Casuarina cunninghamiana	7 & 8	11	C	C	1	Cut / DWC
47	Liquidambar styraciflua	6	30	C	C	3	Cut / DWC / DWC
48	Citrus x paradisi	6 & 7	9	C	C	1	Cut / DWC / DWC
49	Casuarina cunninghamiana	4 & 5	40	C	C	1	Cut / DWC / DWC
50	Citrus x paradisi	6	9	C	C	3	Cut / DWC / DWC / DWC / DWC
51	Citrus x paradisi	6 & 7	9	C	C	1	Cut / DWC / DWC / DWC
52	Citrus x paradisi	7 & 8	9	C	C	3	Cut / DWC / DWC
53	Casuarina cunninghamiana	7 & 8	9	C	C	1	Cut / DWC / DWC
54	Pinus halepensis	7	11	C	C	1	Cut / DWC / DWC
55	Eucalyptus polybractea	30	80	C	C	3	Cut / DWC / DWC
56	Pinus canariensis	7 & 8	11	C	C	1	Cut / DWC / DWC
57	Liquidambar styraciflua	8	30	C	C	3	Cut / DWC / DWC
58	Citrus x paradisi	6 & 7	9	C	C	1	Cut / DWC / DWC
59	Citrus x paradisi	6 & 7	9	C	C	1	Cut / DWC / DWC
60	Citrus x paradisi	6 & 7	9	C	C	3	Cut / DWC / DWC / DWC / DWC
61	Citrus x paradisi	6 & 7	9	C	C	1	Cut / DWC / DWC
62	Citrus x paradisi	7 & 8	9	C	C	3	Cut / DWC / DWC
63	Citrus x paradisi	7 & 8	9	C	C	1	Cut / DWC / DWC
64	Citrus x paradisi	6 & 7	9	C	C	1	Cut / DWC / DWC
65	Citrus x paradisi	7 & 8	9	C	C	1	Cut / DWC / DWC
66	Liquidambar styraciflua	24	50	C	C	3	Cut / DWC / DWC
67	Pinus canariensis	24	55	C	C	3	Cut / DWC / DWC
68	Pinus canariensis	24	50	C	C	3	Cut / DWC / DWC

Abbreviations in the Matrix of Findings

NOTE: NO EXISTING TREE WITHIN THE SCOPE OF WORK IS PROTECTED BY THE CITY OF LOS ANGELES.

NOTE: REFER TO CONSULTING ARBORIST'S REPORT. 'TREE INVENTORY & PRESERVATION REPORT FOR CLEVELAND HIGH SCHOOL, RESEDA' DATED JANUARY 11, 2017 FOR ADDITIONAL INFORMATION.

HPI architecture 115 twenty second street, newport beach, california 92663 www.hpiarchitecture.com

EXISTING TREE INVENTORY PLAN L1.1

JANUARY 2017 | GROVER CLEVELAND CHARTER HIGH SCHOOL | LAUSD

Figure 5 – Tree Removal Site Plan

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3.3. Necessary Approvals

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

- LAUSD Zoning Exemption
- LAUSD Adoption of an ND
- California Department of Education, School Facilities Planning Division
- California Department of General Services, Office of Public School Construction
- California Department of General Services, Division of the State Architect
- State Water Resources Control Board
- Los Angeles Regional Water Quality Control Board
- City of Los Angeles Building and Safety Department
- City of Los Angeles Public Works Department
- City of Los Angeles Department of Transportation
- City of Los Angeles Fire Department (LAFD)
- Other permits and approvals as deemed necessary

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4. ENVIRONMENTAL CHECKLIST AND ANALYSIS

Los Angeles Unified School District

Office of Environmental Health and Safety

CALIFORNIA ENVIRONMENTAL QUALITY ACT

INITIAL STUDY

CHECKLIST

LEAD AGENCY		DATE
Los Angeles Unified School District, Office of Environmental Health and Safety 333 S. Beaudry Avenue, 21st Floor, Los Angeles, CA 90017		August 2017
LEAD AGENCY CONTACT	PHONE NUMBER	
Linda Wilde, CEQA Project Manager/Contract Professional	(213) 241-4821	
SCHOOL SITE	SCHOOL SITE ADDRESS	
Cleveland Charter High School	8140 Vanalden Avenue, Reseda, California	
PROJECT TITLE	LAUSD LOCAL DISTRICT	LAUSD COLIN ID
Cleveland Charter High School Comprehensive Modernization	Northwest	10366805

PROJECT DESCRIPTION

The proposed Project includes the removal of nine permanent and 28 portable buildings, new construction, replacing deteriorated utility lines, relocating existing storage units, hardscape, cosmetic upgrades, and site improvements to the existing campus. The existing buildings noted for demolition do not meet the requirements of the school or the minimum CDE standards. Currently, there are inadequate or nonexistent performing arts spaces, including theater, dance, choral, and music. Similarly, the existing science labs are undersized and lack the equipment necessary to teach 21st century science. Under LAUSD's goal to reduce the number of students using temporary facilities, portable buildings would be removed. This would also improve student safety and wayfinding on campus.

The demolished school buildings would be replaced by seven new buildings: Building A (a two-story General Classroom Building); Building B (a three-story General and Science Classroom Building); Building C (a one-story Food Service Building); Building D (a one-story Performing Arts Center and Student Store); Building E (Maintenance and Operations Building), Building F (Community Day Care), and Building G (Transportation Building). Also included in this proposed Project are site utilities infrastructure upgrades; new asphalt paving for physical education play courts; parking; landscape and hardscape areas; pedestrian/energy service road rerouting to join Wilbur Avenue and Cantara Street (private); and conversion of a portion of the old service road into a pedestrian spine. In addition, the existing buildings would require different levels of modernization, including exterior repainting, programmatic access, and complete interior remodeling. The school has no plan to increase the enrollment beyond the planned capacity of 3,942 students.

ENVIRONMENTAL SETTING

The 37-acre campus was found eligible for the NRHP and CRHR as a Historic District. The layout is a good example of a finger-and cluster-designed campus, characterized by pavilion-like classroom wings "clustered" around courtyards with axial classroom wings connected by a central corridor. The following buildings were found to be contributing components to the district: Classroom Building 1, Library Building 2, Classroom Building 3, Administrative Building 6, Classroom Buildings 7 through 10, Buildings 4 and 5, Building 11, Building 13, Multi-Purpose Building 12, Student Store Building 15, Classroom Building 18, Building 16, Building 17, Classroom Building 20, and Physical Education Building 21.

PROJECT LOCATION

Cleveland HS is located at 8140 Vanalden Avenue APN 2104-004-905) in the Reseda-West Van Nuys Community Plan Area of the City of Los Angeles.

EXISTING ZONING	EXISTING LAND USE DESIGNATION	
[Q]PF-1XL (Public Facilities) [20]	Public Facilities[21]	☐ REQUIRES STATE FUNDING

SURROUNDING LAND USES

Cleveland HS is located within the Reseda-West Van Nuys Community Plan Area of the City of Los Angeles. According to the City of Los Angeles Local Population and Housing Profile for the Reseda-West Van Nuys Community Plan Area, the community contains a population of 112,197 persons (2014 estimates) and is approximately 12.077 square miles in size. The area is urbanized and is primarily comprised of low-density single-family residential land uses. Single-family residences comprise most of the land use located north, south, and west of the school parcel. An existing electrical transmission corridor and Aliso Canyon Wash are located east of the campus.

Regional transportation facilities serving the Project vicinity include the San Diego Freeway (I-405), located approximately 4 miles east of the Project site and accessed by Roscoe Boulevard; the Ronald Reagan Freeway (SR 118), located 4 miles north of the Project and accessed by Tampa Avenue; and Ventura Freeway (US 101), located approximately 3 miles south of the Project site and accessed by Reseda Boulevard or Tampa Avenue.

OTHER PUBLIC AGENCY APPROVALS

STATE
- California Department of Education, School Facilities Planning Division
- California Department of General Services, Office of Public School Construction
- California Department of General Services, Division of the State Architect
- State Water Resources Control Board

REGIONAL
- Los Angeles Regional Water Quality Control Board

LOCAL (City of Los Angeles)
- Building and Safety Department
- Fire Department
- Public Works Department
- Department of Transportation (haul route)

[20] City of Los Angeles. April 6, 2017. ZIMAS [Zone Info and Map Access System]. http://zimas.lacity.org/.
[21] Ibid.

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

Note: Conducting consultation early in the CEQA process allows tribal governments, lead agencies, and Project proponents to discuss the level of environmental review, identify and address potential adverse impacts to tribal cultural resources, and reduce the potential for delay and conflict in the environmental review process (see PRC Section 21083.3.2). Information may also be available from the California Native American Heritage Commission's Sacred Lands File per PRC Section 5097.94 and the California Historical Resources Information System administered by the California Office of Historic Preservation. Please also note that PRC Section 21082.3(c) contains provisions specific to confidentiality.[22]

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

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

DETERMINATION

On the basis of this initial evaluation:

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

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

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

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

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

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 paragraphs 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 ND (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 information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.

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

8) The explanation of each issue should identify:

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

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

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4.1. Aesthetics

ENVIRONMENTAL ISSUE	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
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?	☐	☐	☒	☐

a) Less than Significant Impact. The study area is highly urbanized and contains a mixture of residential, open space, and commercial land uses. Public views, which incorporate the Project site, are from the surface streets surrounding the school, including Roscoe Boulevard on the north, Aliso Canyon Wash on the east, Strathern Street on the south, and Vanalden Avenue on the west. Views from these streets are of the built environment adjacent to the roadway.

The Program EIR identifies select scenic vistas and aesthetic features within the District; none of those are located within the vicinity of Cleveland HS.[23] From the streets and open space areas (away from residential and commercial structures), there are views to the Santa Susana Mountains, located 12.5 miles northwest of the campus. The proposed Project involves new construction and improvements to existing campus buildings and associated improvements to the campus site. There are no designated scenic vistas along Vanalden Avenue, Roscoe Boulevard, or within the Project vicinity; therefore, no scenic vistas would be affected by the Project. No mitigation measures or further evaluation are required.

b) No Impact. The Project area is developed with residential and commercial uses, and there are no scenic resources within the school campus or within the Project vicinity. There is no scenic highway within or adjacent to the Project area, nor are there State-designated scenic corridors in the Project area.[24] The nearest officially designated State of California Scenic Highway is Angeles Crest Highway (SR 2), about 20 miles east of the Project site. No further analysis of this issue is required.

c) Less than Significant Impact. The campus has been determined to be eligible as a historic district under NRHP and CRHR Criteria A/1[25], in the context of institutional architecture/educational facilities in Los Angeles (1945–1969). As an intact, indoor-outdoor finger-plan school, Cleveland HS exemplifies LAUSD design ideals and principles of the era. The school is also eligible as a historic district under Criteria A/1 and C/3, as an excellent example of Mid-Century Modern style applied to institutional architecture.[26]

The contributing elements of the district were defined as the complex of buildings and structures that form the campus core, specifically consisting of the site plan and landscape elements. This high school was found to be a good example of a finger- and cluster-designed campus, which is characterized by pavilion-like classroom wings "clustered" around courtyards with axial classroom wings connected by a central corridor. In addition to this historic plan, the following buildings were found to be contributing components to the district: Classroom Building 1; Library Building 2; Classroom Building 3; Administrative Building 6; Classroom Buildings 7 through 10, Buildings 4 and 5; Building 11; Building 13; Multi-Purpose Building 12,

[23] LAUSD SUP Final EIR, September 2015.
[24] City of Los Angeles, Transportation Element, Scenic Highways, June 1998.
[25] United States Department of the Interior. National Register Bulletin. *How to Apply the National Register Criteria for Evaluation.* https://www.nps.gov/nr/publications/bulletins/nrb15/nrb15_6.htm
[26] Sapphos Environmental, Inc. LAUSD: Historic Context Statement, 1870 to 1969 (March 2014): 71-113.

Student Store Building 15, Classroom Building 18; Building 16; Building 17; Classroom Building 20; and Physical Education Building 21.

Implementation of the proposed improvements would result in removing some contributing components from the school site (Buildings 11, 13, 16, 17, 14, and 15); therefore, impacts to historical resources would occur as discussed in detail in Section C, Cultural Resources, of this IS Checklist. However, with implementation of SC-CUL-1, SC-CUL-2, SC-CUL-3, SC-CUL-~~8~~4, ~~SC-CUL-9,~~ SC-CUL-~~10~~5, SC-CUL-~~11~~6, and SC-CUL-~~13~~ 8 described in Section V, Cultural Resources, the impacts would be reduced to a less than significant level as the eligibility of the school site as a whole would be retained.

In addition to the historic components described above, other proposed improvements would be designed to complement the existing campus architecture, including building scale, general building siting, materials, and landscaping. LAUSD would apply design standards to ensure the Project's aesthetic compatibility with the existing campus and neighborhood.[27] Such design standards include the incorporation of BMPs during Project design, construction, and operation. These measures are required from the LAUSD *School Design Guide* to encourage site-specific Project design to protect the character and quality of site surroundings.[28] The new school facilities would be designed to respect the visual character of the campus (e.g., campus parti, architectural character, and scale) due to the historic status of the campus. The architectural character for this modernization Project would be derived from the 1950s mid-century modern style. Three existing permanent buildings would have moderate interior renovations and minor exterior improvements limited to painting. The remaining permanent buildings would also have exterior painting. Design features would be incorporated into the design of the planned construction and would include the mid-century-inspired exterior style, hardscape such as paving and pavers using natural colored concrete, and new landscaping (e.g., trees, shrubs) to complement the modernization exterior improvements. These design approaches would reduce the overall aesthetic impacts from the proposed Project

The blockage of direct sunlight onto existing, adjacent structures would create potential effects of shade and shadow. Shade-sensitive uses include residential uses, nonresidential uses with associated outdoor spaces, and solar panel users. The new Science and Classroom Buildings (Buildings A and B) are situated north and east of the new Performing Arts Center. These new buildings would be multi-storied. Building A would be two stories high, and Building B would be three stories high. Building A is proposed as a new two-story building and would be situated south of Classroom Building #10, as shown in Figure 3. Shadow lengths would depend on the height and size of the building from its location and the angle of the direct sunlight. The distance between new Building A and existing Building #10 would be approximately 50 feet. New shade effects on Building #10 would be minimal due to the distance between the buildings; thus, impacts would be less than significant. The nearest residential property is more than 200 feet east of the new Building B; therefore, there would be less than significant shade impacts on neighboring residential properties.

Temporary impacts are anticipated during Project construction and would include construction equipment and materials including, but not limited to, storage and stockpiling, and construction-area barriers and fencing. However, these impacts would be temporary in nature. Therefore, impacts to the existing visual character and quality of the site and its surroundings would be less than significant. No mitigation measures or further evaluation are required.

d) Less than Significant Impact. The Project would construct new buildings to replace the old buildings that would be demolished, which would include new lighting within the campus. No new lighting associated with these improvements is proposed outside of the campus or in proximity to the public right-of-way. Existing artificial lighting is provided on campus and is comprised of ambient light levels. New site lighting as part of the proposed Project would consist of building soffit-mounted lights, plaza area post top lights, and pathway lighting. All new lighting would provide enhanced site security and be designed consistent

[27] LAUSD School Design Guide, October 2016.
[28] LAUSD School Design Guide, October 2016.

with the LAUSD *School Design Guide*.[29] Nighttime illumination would be designed, arranged, directed, or shielded in accordance with existing applicable regulations and guidelines for school operations. Adherence to the applicable guidelines and regulations for school site lighting would avoid excess illumination and light spillover to adjacent land uses; therefore, implementation of the Project improvements would not create a new source of substantial light or glare that would adversely affect day or nighttime views in the Project area. No mitigation measures or further evaluation are required.

4.2. Agricultural and Forest Resources

ENVIRONMENTAL ISSUE	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
II. AGRICULTURE AND FOREST 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 the 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 PRC Section 12220(g)), timberland (as defined by PRC 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?	☐	☐	☐	☒

a) No Impact. According to the California Department of Conservation Farmland Mapping and Monitoring Program, the Project site is within an area designated as Urban and Built-Up Land.[30] The Project area is urbanized and contains no farmland or agricultural land. The Project improvements would be constructed on the existing campus, and no agricultural uses or related operations are present within the Project site or in the surrounding area; hence, there would be no effects to farmland. No further analysis of this issue is required.

b) No Impact. The proposed Project would not affect any farmland uses or Williamson Act contracts because no farmland or agricultural land exists within the study area. The Project site and study area are urbanized. No further analysis of this issue is required.

c) No Impact. The Project site is urbanized and zoned for public facility uses (PF-1XL) by the City of Los Angeles.[31] The Project improvements would be constructed on the existing campus and would not conflict with existing zoning for, or cause rezoning of, forest land or timberland zoned for Timberland Production. No further analysis of this issue is required.

[29] LAUSD School Design Guide, October 2016.
[30] State of California Department of Conservation http://www.conservation.ca.gov/dlrp/fmmp. Accessed November 2016.
[31] City of Los Angeles, 2016. NavigateLA Website Accessed November 2016 - http://navigatela.lacity.org/navigatela/.

d) No Impact. The Project area is urbanized with no forest lands; hence, there would be no effects to forest or timberlands. No further analysis of this issue is required.

e) No Impact. Because there is no farmland or forest in the Project vicinity, the proposed Project would not convert farmland or forest to non-agricultural uses. No further analysis of this issue is required.

4.3. Air Quality

The following analysis of potential air quality impacts is based on the findings from the *Air Quality Technical Report* prepared for this Project (see Appendix A).

ENVIRONMENTAL ISSUE	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
III. AIR QUALITY: Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☒	☐
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 nonattainment 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?	☐	☐	☒	☐

The Program EIR includes Standard Conditions for minimizing impacts to air quality in areas where projects would be implemented under the SUP. Applicable Standard Conditions related to air quality impacts for the proposed Project are listed below.

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

a) Less than Significant Impact. The Project site is located within the 6,745-square-mile South Coast Air Basin (SCAB). The South Coast Air Quality Management District (SCAQMD) is required, pursuant to the Clean Air Act (CAA), to reduce emissions of criteria air pollutants for which the SCAB is in nonattainment (i.e., ozone [O_3], particulate matter less than 10 microns in diameter [PM_{10}], and particulate matter less than 2.5 microns in diameter [$PM_{2.5}$]). The Project would be subject to SCAQMD's Air Quality Management Plan (AQMP), which contains a comprehensive list of pollution control strategies directed at reducing emissions and achieving ambient air quality standards. These strategies are based, in part, on regional population, housing, and employment projections prepared by the Southern California Association of Governments (SCAG), the regional planning agency for Los Angeles County. The strategies address regional issues about transportation, the economy, community development, and the environment.

A project is consistent with the AQMP if it is consistent with the population, housing, and employment assumptions that were used to develop the AQMP. The proposed Project would not increase the planned capacity, so no population increase would result from its implementation; therefore, the Project would not be considered growth-generating, and it can be concluded that the Project would be consistent with the projections in the AQMP. In addition, as further discussed below, implementation of the proposed Project would not exceed any ambient air quality standards or thresholds; therefore, the proposed Project would not conflict with or obstruct implementation of SCAQMD's AQMP.

The Congestion Management Program (CMP) was enacted by the Los Angeles County Metropolitan Transportation Authority (Metro) to address traffic congestion issues that could impact quality of life and economic vitality. The intent of the program is to provide an analytical basis for transportation decisions throughout the state. An analysis is required at all CMP monitoring intersections for which a project is projected to add 50 or more trips during any peak hour.

Project construction would intermittently require up to 50 workers onsite and up to 12 haul trucks per day. LAUSD encourages construction hauling to occur during off-peak commuter travel times. As a result, the proposed Project would not exceed any CMP thresholds, and the proposed Project would not impact the CMP network or conflict with or obstruct its implementation.

Operation of the proposed Project would not generate new trips because the Project would not increase student enrollment beyond the planned capacity.

The District is required to incorporate the LAUSD *School Design Guide* into the site design and construction, and consistency with the applicable AQMP is mandated. Therefore, implementation of the proposed Project would not conflict with or obstruct implementation of the AQMP or CMP, and Project-related impacts would be less than significant. No mitigation measures or further evaluation are required.

b) Less than Significant Impact. As indicated above, the Project site is located within the SCAB, which is characterized by relatively poor air quality. State and federal air quality standards are often exceeded in many parts of the SCAB, including those monitoring stations nearest to the Project location. Construction activities associated with the proposed Project would contribute to local and regional air pollutant emissions during construction (short-term). Based on the following analysis, however, construction and operation of the proposed Project would result in less than significant impacts relative to the daily significance thresholds for criteria air pollutant emissions established by SCAQMD for construction and operational phases.

Construction Impacts

Construction could impact regional air quality by using heavy-duty construction equipment and by vehicle trips generated by construction workers traveling to and from the Project site. In addition, fugitive dust emissions would result from demolition, site preparation, and construction activities. Mobile source emissions, primarily particulate matter (PM) and nitrogen oxides (NO_X) would result from the use of construction equipment such as bulldozers, loaders, and haul trucks. Construction emissions can vary substantially from day to day, depending on the level of activity, the specific type of operation and, for dust, the prevailing weather conditions.

During the finishing phase, paving operations and the application of architectural coatings (i.e., paints) and other building materials would release volatile organic compounds (VOCs). For purposes of calculation, the application of architectural coatings to existing buildings being renovated was assumed to be ongoing during other construction activities.

The entire demolition, construction, and modernization activities are anticipated to take approximately 36 months (two 18-month sequential phases). Regional construction-related emissions associated with heavy construction equipment were calculated using the CalEEMod emissions inventory model originally developed by SCAQMD, accounting for mandatory control measures. The analysis also includes implementation and compliance with CHPS prerequisite criteria and LAUSD Standard Conditions of Approval. The construction schedule and equipment mix were based on preliminary designs and are subject to minor changes during final design and as dictated by field conditions. Model results are provided in the Air Quality Technical Report prepared for this Project (Appendix A of this document). The analysis assumed that all construction activities would comply with SCAQMD Rule 403 regarding the control of fugitive dust. A summary of maximum daily regional construction emissions by construction year is presented in Table 3, along with the regional significance thresholds for each air pollutant. As shown therein, maximum regional construction emissions of criteria air pollutants would not exceed the thresholds, although maximum regional emissions of VOCs would be approaching its significance threshold.

Table 3 – Project Construction Emissions

Construction Year	Maximum Daily Emissions by Construction Year (lb/day)						
	VOC	NO_X	CO	SO_2	PM_{10}	$PM_{2.5}$	CO_2e
2018	3.5	37.8	28.9	0.03	8.2	4.6	3,442
2019	3.9	32.8	27.8	0.04	8.1	4.5	3,389
2020	73.4	33.2	27.5	0.04	8.0	4.9	4,328
2021	70.0	27.5	26.9	0.04	2.2	1.0	3,323
Maximum Regional Emissions	73.4	37.8	28.9	0.04	8.2	4.9	NA
SCAQMD Daily Significance Thresholds	75	100	550	150	150	55	NA
Exceed Threshold?	No	No	No	No	No	No	NA

Notes: VOC – volatile organic compounds, NO_X – nitrogen oxides, CO – carbon monoxide, SO_2 – sulfur dioxide, PM_{10} – Particulate Matter less than 10 microns in diameter, $PM_{2.5}$ – Particulate Matter less than 2.5 microns in diameter, CO_2e – carbon dioxide equivalent.

Source: See Appendix A.

The proposed Project would include grading and construction activities; therefore, fugitive dust could be emitted. As required by the District, the proposed Project would be consistent with plans adopted for the purpose of reducing criteria air pollutant emissions, such as CALGreen (Title 24), SCAQMD Rule 403, and other statewide strategies to reduce criteria pollutant emissions. All unpaved demolition and construction areas would be wetted at least twice daily during excavation and construction, and temporary dust covers would be used as feasible to reduce dust emissions by up to 50 percent to comply with SCAQMD District Rule 403.

Though construction emissions for this Project are not expected to exceed regional thresholds, the District is required to incorporate measures from –Program EIR. Incorporating SC-AQ-2 will ensure that construction emissions would have minimal offsite impacts. With implementation of SC-AQ-2, impacts with respect to construction emissions would remain less than significant. No mitigation measures or further evaluation are required.

Operational Impacts

SCAQMD has separate significance thresholds to evaluate potential impacts from incremental increases in criteria air pollutants associated with long-term Project operations. Long-term air pollutant emissions are typically generated by area sources (e.g., landscaping equipment fuel use, aerosols, and architectural coatings), mobile sources from vehicle trips, and energy use (natural gas), associated with new buildings. Operational emissions for baseline and Project conditions were computed using the CalEEMod emissions inventory model. While the Project would result in an increase of 63,310 square feet of building space over existing conditions, the new buildings would meet the latest Building Energy Efficiency Standards and the CALGreen building code and would be more energy efficient. The operational Project scenario assumed that the school would operate at a planned enrollment of 3,200 students, as well as an increase in building floor area of 63,310 square feet, with attendant onsite and regional stationary and mobile source emissions. Finally, the operational Project scenario assumed that remodeled/modernized space would generate no more air pollutant emissions for comfort heating and the generation of electricity for cooling, lighting, and power needs than it did prior to implementation of the Project.

As indicated in Table 4, the proposed Project would slightly increase maximum daily emissions of criteria air pollutants; however, these emissions would be well below the SCAQMD daily significance thresholds for long-term regional operations. Therefore, the proposed Project would not have a substantial air quality impact from long-term operational emissions, and impacts would be less than significant. No mitigation measures or further evaluation are required.

Table 4 – Project Operational Emissions

Emissions Source	Maximum Daily Emissions (lb/day)						
	VOC	NO_X	CO	SO_2	PM_{10}	$PM_{2.5}$	CO_2e
Area	3.0	<0.001	<0.001	<0.001	<0.001	<0.001	0.0
Energy	0.01	0.1	0.1	<0.001	0.01	0.01	112
Total	3.0	0.1	0.1	<0.001	0.01	0.01	112
SCAQMD LST	NA	194	4,119	NA	21	7	NA
Exceed Threshold?	NA	No	No	NA	No	No	NA

Notes: VOC – volatile organic compounds, NO_X – nitrogen oxides, CO – carbon monoxide, SO_2 – sulfur dioxide, PM_{10} – Particulate Matter less than 10 microns in diameter, $PM_{2.5}$ – Particulate Matter less than 2.5 microns in diameter, LST – Localized Significance Thresholds for a 5-acre site and a 200-foot source-receptor distance.

Source: See Appendix A.

c) **Less than Significant Impact.** Based on the air quality analysis presented above, construction and operation of the proposed Project would result in less than significant impacts relative to the daily significance thresholds for criteria air pollutant emissions established by SCAQMD for construction and operational phases. The proposed Project's contribution to cumulative air quality impacts during construction would be insignificant, and its contribution to cumulative long-term air quality impacts would be negligible.

Construction Impacts

As discussed in response to Checklist Question III.b above, construction emissions of nonattainment pollutants and precursors for the proposed Project are not expected to exceed SCAQMD project-level thresholds or contribute to nonattainment of State or federal air quality standards. Furthermore, the District is required to incorporate measures from LAUSD's *School Design Guide* and SC-AQ-2, thereby ensuring that construction emissions would have minimal offsite impacts. Project construction emissions thus are not expected to result in a cumulatively considerable net increase in any criteria air pollutant for which SCAQMD has established a local impact threshold.

Operational Impacts

Operational air pollutant emissions would result from fuel use to operate landscaping equipment, aerosols from off-gassing of construction materials, and from building energy use. Mobile sources, which are generally the largest contributor to the overall long-term emissions inventory associated with operation of a school, would increase slightly from the baseline level (2015-2016 actual enrollment) if the school is operated at the planned enrollment capacity. As discussed in response to Checklist Question III.b above, peak daily emissions of operational pollutants would not exceed SCAQMD regional significance thresholds. Applying SCAQMD's cumulative air quality impact assessment methods, implementation of the proposed Project would not increase emissions of criteria air pollutants such that substantial cumulative impacts would occur in conjunction with related projects in the region. No mitigation measures or further evaluation are required.

d) Less than Significant Impact. Implementing the proposed Project could expose nearby sensitive receptors to elevated air pollutant concentrations. These sensitive receptors could include children, the elderly, persons with pre-existing respiratory or cardiovascular illness, and athletes and others who engage in frequent exercise. The nearest sensitive receptors to the site are existing students, as well as residential uses adjacent to the site. The nearest sensitive receptors are located approximately 200 feet from the nearest edges of proposed construction areas.

Construction Localized Significant Thresholds

Localized significant thresholds (LST's) are based on the California AAQS, which are the most stringent AAQS that have been established to provide a margin of safety in the protection of human health and welfare. They are designed to protect sensitive receptors most susceptible to further respiratory distress,

such as asthmatics, the elderly, young children, people already weakened by other diseases or illness, and people engaged in strenuous work or exercise. Construction LSTs are based on the size of the construction area, distance to the nearest sensitive receptor, and source receptor area. The proposed Project's anticipated maximum daily construction emissions, shown in Table 3, and the LSTs presented in Table 4 indicate that $PM_{2.5}$ emissions from construction activities could occasionally have a substantial effect on outdoor air quality at the closest residential units. The maximum daily construction emissions generated from onsite construction-related activities would be less than SCAQMD screening-level construction LST's. Because construction activities would be spread over a large area and would occur intermittently during the day, the potential for reaching LSTs would be reduced. Based on the proposed Project's maximum daily operational emissions and SCAQMD LSTs shown in Table 4, operational emissions from the project would have no potential to affect nearby sensitive receptors.

Construction Emission Health Risk

Emissions from construction equipment primarily consist of diesel particulate matter (DPM). In March 2015, the Office of Environmental Health Hazards Assessment (OEHHA) adopted new guidance for the preparation of health risk assessments. OEHHA developed a cancer risk factor and non-cancer chronic reference exposure level for DPM, but these factors are based on continuous exposure over a 30-year time frame. No short-term acute exposure levels have been developed for DPM. The proposed Project would be constructed over approximately 36 months, which would limit the exposure to receptors. Additionally, construction activities would not exceed the screening-level LST significance thresholds. Therefore, construction emissions would not pose a threat to receptors at or near the school campus, and project-related construction health impacts would be less than significant.

Operation Localized Significance Thresholds

Operation of the proposed Project would not generate substantial quantities of emissions from onsite, stationary sources. Land uses that have the potential to generate substantial stationary sources of emissions 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. The proposed Project does not fall within these uses. While operation of the proposed Project would result in the use of standard mechanical equipment such as heating, ventilation, and air conditioning units in the new proposed buildings, air pollutant emissions generated from these activities would be nominal. Therefore, localized air quality impacts related to stationary-source emissions would be less than significant.

Carbon Monoxide Hotspots

The SoCAB has been designated "attainment" for CO under both the national and California AAQS. Under existing and future vehicle emission rates, a project would have to increase traffic volumes at a single intersection by more than 44,000 vehicles per hour—or 24,000 vehicles per hour where vertical and/or horizontal mixing is substantially limited—to generate a significant CO "hotspot" impact.[32] The proposed Project would not increase school capacity, and thus would not result in generation of additional vehicle trips. Thus, the proposed Project would not have the potential to substantially increase CO hotspots at intersections in the vicinity of the school. Localized air quality impacts related to mobile-source emissions would be less than significant.

e) Less than Significant Impact. According to SCAQMD's *CEQA Air Quality Handbook*, construction equipment is not a typical source of odors. Potential sources of odors during construction include the application of asphalt and architectural coatings and the use of cleaning solvents. SCAQMD Rule 1113 limits the amount of VOCs from architectural coatings and solvents. SCAQMD Rules prohibit construction activities or materials that could emit objectionable odors. Any odors from construction equipment exhaust or from asphalt or architectural coatings would be temporary and intermittent, and such odors would cease upon the drying or hardening of these materials. The nearest sensitive receptors to the

[32] Bay Area Air Quality Management District (BAAQMD). 2011, Revised. California Environmental Quality Act Air Quality Guidelines. BAAQMD has specific screening criteria for determining CO impacts and SCAQMD does not.

site are existing students and nearby residents; however, Project-related construction activities would not typically generate nuisance odors at nearby sensitive receptors.

According to SCAQMDs *CEQA Air Quality Handbook*, land uses associated with odor complaints typically include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding. The proposed Project would not involve elements related to these types of uses. Onsite trash receptacles used by the proposed Project would be covered and properly maintained to prevent adverse odors. With proper housekeeping practices, trash receptacles would be maintained in a manner that promotes odor control, and no adverse odor impacts are anticipated from these types of land uses. While there is a potential for odors to occur, compliance with industry standard odor control practices, SCAQMD Rule 402 (Nuisance), and SCAQMD Best Available Control Technology Guidelines would limit potential objectionable odor impacts to a less than significant level; therefore, odor impacts related to Project implementation would be less than significant. No mitigation measures or further evaluation are required.

4.4. Biological Resources

ENVIRONMENTAL ISSUE	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
IV. BIOLOGICAL RESOURCES: Would the project:				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	☐	☐	☒
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or 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?	☐	☐	☒	☐
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?	☐	☐	☒	☐
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☐	☒
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?	☐	☐	☐	☒

The Program EIR includes Standard Conditions for minimizing impacts to biological resources in areas where projects would be implemented under the SUP. Applicable Standard Conditions related to biological resource impacts for the proposed Project are listed below.

SC-HWQ-2 **Compliance Checklist for Stormwater Requirements at Construction Sites.** This checklist has requirements for compliance with the General Construction Activity Permit and is used by the Office of Environmental Health and Safety (OEHS) to evaluate permit compliance. Requirements listed include an SWPPP; BMPs for minimizing stormwater pollution to be specified in an SWPPP; and monitoring stormwater discharges to ensure that sedimentation of downstream waters remains within regulatory limits.

SC-BIO-3 **Bird and Bat Nesting Sites.** LAUSD shall comply with the following:

- Project activities including, but not limited to, staging and disturbances to native and nonnative vegetation, structures, and substrates, should occur outside of avian breeding season to avoid take of birds or their eggs. Depending on the avian species present, a qualified biologist may determine that a change in the breeding season dates is warranted.
- If avoidance of the avian breeding season is not feasible, beginning 30 days prior to the initiation of the project activities, a qualified biologist with experience in conducting breeding bird surveys shall conduct weekly bird surveys to detect protected native birds occurring in suitable nesting habitat that is to be disturbed and (as access to adjacent areas allows) any other such habitat within 300 feet of the disturbance area (within 500 feet for raptors). The surveys shall continue on a weekly basis, with the last survey being conducted no more than 3 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 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 onsite, shall be instructed on the sensitivity of the area. LAUSD shall provide results of the recommended protective measures to document compliance with applicable State and federal laws pertaining to the protection of native birds.
- If the qualified biologist determines that a narrower buffer between the project activities and observed active nests is warranted, a written explanation as to why (e.g., species-specific information; ambient conditions and birds' habituation to them; and the terrain, vegetation, and birds' lines of sight between the project activities and the nest and foraging areas) shall be submitted to the LAUSD OEHS project manager. Construction contractors can then reduce the demarcated buffer.
- No 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 construction.
- A biological monitor shall be present onsite 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 the LAUSD OEHS project manager during the grubbing and clearing of vegetation, and shall notify LAUSD immediately if project activities damage avian nests.

a) No Impact. The Project site is an existing school campus located in an urbanized area. The developed land within the campus is disturbed and consists of non-native vegetation species commonly used for landscaping. Aliso Canyon Wash, a concrete-lined channel, runs along the east side of the school. Aliso Canyon Wash is a major tributary of the Upper Los Angeles River in the Santa Susana Mountains in Los Angeles County and western San Fernando Valley in the City of Los Angeles. No natural communities or riparian habitat besides little seasonal vegetation (consisting of small patches of grass and weed growth) were observed in the wash during the site visit on November 10, 2016. Based on the California Natural

Diversity Database, there are no sensitive species or suitable habitat for sensitive species expected to occur in the Project vicinity.[33]

The proposed Project involves the demolition of existing buildings; construction, modernization, and seismic retrofit of school facilities; and sitewide infrastructure upgrades with no increase in the planned student capacity. The proposed improvements would be constructed within the existing school campus and would not affect any sensitive plant or animal species; therefore, the proposed Project would not have an adverse effect either directly, or indirectly through habitat modification, 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 (CDFW) or U.S. Fish and Wildlife Service (USFWS). No further analysis of this issue is required.

b) Less than Significant Impact. The Project site is an existing school campus and is not located within a sensitive natural community, as designated by the City or County of Los Angeles, CDFW, or USFWS. No riparian habitat exists within the school site. Aliso Canyon Wash, a concrete-lined channel, runs along the east side of the school. There are no natural communities or riparian habitat present within the wash on a permanent basis; small patches of grass and weed growth are present within the wash on a seasonal basis. The proposed improvements would be constructed within the existing school campus. Though an existing utility easement is situated between the campus and Aliso Canyon Wash, there is the potential of storm runoff during Project construction that may affect the flood control channel. Given the distance between the campus and the wash and the implementation of stormwater runoff BMPs, impacts to any riparian habitat or other sensitive natural community that may be seasonally present within the wash would be less than significant. No mitigation measures or further evaluation are required.

c) Less than Significant Impact. The concrete-lined Aliso Canyon Wash runs along the east side of the school. The wash collects stormwater runoff that originates from the Santa Susana Mountains and discharges to the Los Angeles River at its confluence north of Victory Boulevard between Wilbur Avenue and Reseda Boulevard. No natural communities or riparian habitat, besides little seasonal vegetation consisting of small patches of grass and weed growth, were observed in the wash during the site visit on November 10, 2016. The proposed Project involves the demolition of existing buildings; construction, modernization, and seismic retrofit of school facilities; and sitewide infrastructure upgrades with no increase in student enrollment or capacity. These improvements would not be constructed within or near Aliso Canyon Wash. Removal of the portables along the eastern property limits may have the potential of stormwater runoff entering Aliso Canyon Wash. A Stormwater Pollution Prevention Plan (SWPPP) and BMPs would be in place to prevent stormwater pollution onto nearby facilities [Standard Condition SC-HWQ-2]. Therefore, the proposed Project would have less than significant impacts with the implementation of SC-HWQ-2, on Waters of the U.S. as defined by Section 404 of the Clean Water Act through direct removal, filling, hydrological interruption, or other means. Impacts would be less than significant. No mitigation measures or further analysis is warranted.

d) Less than Significant Impact. The Project site is an existing school campus located in an urbanized area, which contains no native habitat or wildlife corridors. The proposed Project would involve improvements to the school facilities within the existing school campus; thus, it would not interfere 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.

Mature trees are located throughout the campus, including several trees adjacent to structures subject to removal. According to the *Tree Inventory & Preservation Report* (January 11, 2017) completed for this Project, 63 trees are growing around the plan area at Cleveland HS, including several pines, tulip trees, sweet gum, and palms. There is also a good collection of citrus varieties. Their sizes, health, and structural condition are provided in the aforementioned tree report. As shown in the tree removal plan (see Figure 5 in Chapter

[33] State of California Department of Fish and Wildlife, 2016. California Natural Diversity Database. Accessed November 2016 https://www.wildlife.ca.gov/Data/CNDDB.

3), the proposed Project would remove 46 trees due to building construction, remove 10 trees due to poor health, and protect seven trees in place.

Bird species covered by the Migratory Bird Treaty Act (MBTA) may be present within the Project site and could be affected by the removal of trees or shrubbery. As the proposed Project would result in the removal of 56 onsite trees, nesting birds protected under the MBTA could be affected if these activities are undertaken during the nesting season (February 1 through August 31; as early as January 1 for some raptors). To avoid this impact, adherence to Standard Condition SC-BIO-3 (SUP Program EIR, 2015) would be applied to restrict tree and shrub removal during this time period. Alternatively, if this period cannot be avoided, surveys in advance of tree removals would be required to ensure that no nesting migratory birds are present.

The proposed Project would have less than significant impacts to migratory birds and raptors with implementation of SC-BIO-3. No mitigation measures or further analysis is warranted.

e) No Impact. The proposed Project would not be expected to conflict with any local policies or ordinances protecting biological resources. According to the *Tree Inventory & Preservation Report* (January 11, 2017) conducted for this Project, there are no protected or native trees subject to City of Los Angeles ordinance located within the study area. No further analysis of this issue is required.

f) No Impact. The Project area is urbanized and is not located within an adopted Habitat Conservation Plan (HCP), Natural Community Conservation Plan (NCCP), or other approved local, regional, or state HCP. The Project site is not located within a Significant Ecological Area (SEA) identified by the County of Los Angeles.[34] The proposed Project would, therefore, not conflict with any adopted HCP, NCCP, or other approved local, regional, or state HCP. There are also no state or federally designated threatened and endangered species in the Project area and associated study area. No further analysis of this issue is required.

4.5. Cultural Resources

ENVIRONMENTAL ISSUE	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
V. CULTURAL RESOURCES: Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?	☐	☐	☒	☐
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	☐	☐	☒	☐
c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☐	☒	☐
d) Disturb any human remains, including those interred outside of formal cemeteries?	☐	☐	☒	☐

The Program EIR includes Standard Conditions for minimizing impacts to cultural resources in areas where projects would be implemented under the SUP. Applicable Standard Conditions related to cultural resource impacts for the proposed Project are listed below.

SC-CUL-1: <u>Design Team to Include Qualified Historic Architect</u>

<u>For campuses with qualifying historical resources under CEQA, the Design team shall include a qualified Historic Architect. The Historic Architect shall provide input to ensure ongoing compliance, as project plans progress, with the Secretary of the Interior's</u>

[34] County of Los Angeles Department of Regional Planning, 2016. Significant Ecological Area (SEA) Program Website. Accessed November 2016 - http://planning.lacounty.gov/sea.

Standards and LAUSD requirements and guidelines for the treatment of historical resources (specific requirements follow in SC-CUL-2).

For projects involving structural upgrades to historic resources, the Design team shall include a qualified Structural Engineer with a minimum of eight (8) years of demonstrated project-level experience in Historic Preservation.

The Historic Architect/s shall meet the Secretary of the Interior's Professional Qualifications Standards and the standards described on page 8 of the LAUSD Design Guidelines and Treatment Approaches for Historic Schools. The Historic Architect shall provide input throughout the design and construction process to ensure ongoing compliance with the above-mentioned standards.~~**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.~~

SC-CUL-2: Role of Historic Architect on Design Team

The tasks of the Historic Architect on the Design team shall include (but not necessarily be limited to) the following:

1. The Historic Architect shall work with the Design team and LAUSD to ensure that project components, including new construction and modernization of existing facilities, continue to comply with applicable historic preservation standards, including the Secretary of the Interior's Standards for the Treatment of Historic Properties and LAUSD Design Guidelines and Treatment Approaches for Historic Schools. The Historic Architect shall work with the Design team throughout the design process to develop project options that facilitate compliance with the applicable historic preservation standards.

2. For new construction, the Historic Architect shall work with the Design team and LAUSD to identify options and opportunities for (1) ensuring compatibility of scale and character for new construction, site and landscape features, and circulation corridors, and (2) ensuring that new construction is designed and sited in such a way that reinforces and strengthens, as much as feasible, character-defining site plan features, landscaping, and circulation corridors throughout campus.

3. For modernization and upgrade projects involving contributing (significant) buildings or features, the Historic Architect shall work with the Design team and LAUSD to ensure that specifications for design and implementation of projects comply with the applicable historic preservation standards.

4. The Historic Architect shall participate in design team meetings through all phases of the project through 100 percent construction drawings, pre-construction, and construction phases.

5. The Historic Architect shall produce brief memos, at the 50 percent and 100 percent construction drawings stages, demonstrating how principal project components and treatment approaches comply with applicable historic preservation standards, including the Secretary of the Interior's Standards for the Treatment of Historic Properties and LAUSD Design Guidelines and Treatment Approaches for Historic Schools. The memos will be reviewed by LAUSD.

6. The Historic 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.

7. The Historic Architect shall provide specialized Construction Specifications Institute (CSI) specifications for architectural features or materials requiring restoration, removal, or on-site storage. This shall include detailed instructions on maintaining and protecting in place relevant features.

8. The Design team and Historic Architect shall be responsible for incorporating LAUSD's recommended updates and revisions during the design development and review process.

SC-CUL-3: School Design Guide and LAUSD Design Guidelines and Treatment Approaches for Historic Schools

LAUSD has adopted policies and guidelines that apply to projects involving historic resources. The Design-Builder and Historic Architect shall apply these guidelines, which include the LAUSD School Design Guide and LAUSD Design Guidelines and Treatment Approaches for Historic Schools and the Secretary's Standards for all new construction and upgrade/modernization projects. In keeping with the district's adopted policies and goals, LAUSD shall re-use rather than destroy historical resources where feasible.

LAUSD shall follow the guidelines outlined in these documents to the maximum extent practicable when planning and implementing projects and adjacent new construction involving historical resources. General guidelines shall include:~~**School Design Guidelines**. LAUSD shall reuse rather than destroy historical resources, where feasible. LAUSD shall take the following steps when dealing with historical resources:~~

- Retain and preserve the historic character of a building, structure, or site landscapes, and site features that are historically significant.~~, where feasible.~~
- Repair rather than remove, replace, or destroy character-defining features; if replacement is necessary, replace in-kind to match in materials and appearance.
- Avoid removing, obscuring, or destroying character-defining features and materials.
- 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.

SC-CUL-~~4~~8: Prior to demolition or mothballing activities, LAUSD shall retain a professional architectural photographer and a historian and~~n~~ architectural historian ~~that~~ who meets the Secretary of the Interior's Professional Qualifications Standards to prepare HABS-like documentation for the historical resources slated for demolition.~~(Architectural Historian) to implement Historic American Building Survey (HABS) like documentation closely following the HABS Level II outline format. Documentation shall include scaled drawings (i.e., as-builts), photographs, and written data for each building/structure/element included in the historic district. For all levels of documentation, the following quality standards shall be met:~~

The HABS-like package will document in photographs and descriptive and historic narrative the historical resources slated for demolition. Documentation prepared for the package will draw upon primary- and secondary-source research and available studies

previously prepared for the project. Measured drawings shall not be required for the project.

The specifications for the HABS-like package follow:

~~**Large format p**~~**Photographs:** Photographic documentation will focus on the historical resources/features slated for demolition, with overview and context photographs for the campus and adjacent setting. Photographs will be taken of interior and exterior features of the buildings using a professional-quality single lens reflex (SLR) digital camera with a minimum resolution of 10 megapixels. Photographs will include context views, elevations/exteriors, architectural details, overall interiors, and interior details (if warranted). Digital photographs will be printed in black and white on archival film paper and also provided in electronic format.~~shall include the current status of all recognized contributors to the historic district and the existing surrounding setting. Large format photographs shall clearly depict the appearance of the property and areas of significance of the contributing buildings, site, structures, and/or objects. Each view shall be perspective corrected and fully captioned. All shall be archivally processed, and prints shall be made on fiber-based paper. One original set of negatives (large-format 4-inch by 5-inch black-and-white negatives) shall be made at the time the photographs are taken, and one set of contact prints and three sets of 8-inch by 10-inch prints shall be processed.~~

~~One set of negatives and one set of prints shall be archived at the Los Angeles Public Library at the Central Library;~~

~~One set of prints shall be archived at the Los Angeles City Historical Society; and~~

~~One set of prints shall be archived at LAUSD.~~

Descriptive and Historic Narrative: The historian or architectural historian will prepare descriptive and historic narrative of the historical resources/features slated for demolition. Physical descriptions will detail each resource, elevation by elevation, with accompanying photographs, and information on how the resource fits within the broader campus during its period of significance. The historic narrative will include available information on the campus design, history, architect/contractor/designer as appropriate, area history, and historic context. In addition, the narrative will include a methodology section specifying the name of researcher, date of research, and sources/archives visited, as well as a bibliography. Within the written history, statements shall be footnoted as to their sources, where appropriate.

Historic Documentation Package Submittal: The draft package will be assembled by the historian or architectural historian and submitted to LAUSD for review and comment. After final approval, one hard-copy set of the package will be prepared as follows: Photographs will be individually labeled and stored in individual acid-free sleeves. The remaining components of the historic documentation package (site map, photo index, historic narrative, and additional data) will be printed on archival bond, acid-free paper.

Upon completion of the descriptive and historic narrative, all materials will be compiled in electronic format and presented to LAUSD for review and approval. Upon approval, one hard-copy version of the historic documentation package will be prepared and submitted to LAUSD. The historian or architectural historian shall offer a hardcopy package and compiled, electronic version of the final package to the Los Angeles Public Library (Central Library), Los Angeles Historical Society, and the South Central Coastal Information Center, to make available to researchers.

~~**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 HABS Level II outline format) of historical architectural resources, including Department of Parks and Recreation (DPR) series forms.~~

~~**SC-CUL-9:** LAUSD shall provide OHP and the Los Angeles Conservancy copies of all NDs and EIRs.~~

SC-CUL-5~~10~~: **Historical Resource.** LAUSD, consistent with Education Code Section 17540, shall offer to sell any useful features of the school building (e.g., the school bell, chalkboards, lockers) that do not contain hazardous materials for reuse or display, if features are not retained by LAUSD for reuse or display.

SC-CUL-6~~11~~: **Historical Resource.** 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.

SC-CUL-~~13~~8: **Historical and Archaeological Resource.** The contractor shall halt construction activities in the immediate area and notify LAUSD~~ in the event of a discovery of historical or archaeological resources~~. LAUSD shall retain a qualified archaeologist to make an immediate evaluation of significance and appropriate treatment of the resource. To complete this assessment, the qualified archaeologist will be afforded the necessary time to recover, analyze, and curate the find. The qualified archaeologist shall recommend the extent of archaeological 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~~9: **Archaeological Resource.** 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 archaeological 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-10:~~5~~ **Archaeological Resource.** 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 California State University, Fullerton.

SC-CUL-~~19~~14: LAUSD shall have a paleontological monitor on call during construction activities. This monitor shall provide the construction crew(s) with a brief summary of the sensitivity, the

rationale behind the need for protection of these resources, and information on the initial identification of paleontological resources. If paleontological resources are uncovered during construction, the on-call paleontologist shall be notified and afforded the necessary time and funds to recover, analyze, and curate the find(s). Subsequently, the monitor shall remain onsite for the duration of the ground disturbances to ensure the protection of any other resources that may be in the area.

A historical resource is defined in Section 15064.5(a)(3) of the CEQA Guidelines as any object, building, structure, site, area, place, record, or manuscript determined to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California. Resources listed in or determined eligible for listing in the CRHR, included in a local register, or identified as significant in a historic resource survey are also considered historical resources pursuant to CEQA.

The criteria for listing on the CRHR are defined in Section 5024.1 of the PRC and provide the basis for evaluating historic properties eligible for listing on the CRHR. Specifically, CRHR criteria state that eligible resources must be (1) associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage; or (2) associated with the lives of persons important to our past; or (3) embodies the distinctive characteristics of a type, period, region, or method of construction; represents the work of an important creative individual; or possesses high artistic values; or (4) have yielded or may be likely to yield information important in prehistory or history.

Resources listed on the NRHP are also eligible for listing on the CRHR. The criteria for listing on the NRHP (defined in 36 CFR 60.4 of the National Historic Preservation Act) provide the basis for evaluating historic properties. Properties eligible for the NRHP potentially include districts, sites, buildings, structures, and objects that possess integrity of location, design, setting, materials, workmanship, feeling, and association. Similar to the CRHR, the NRHP eligibility criteria include properties that (A) are associated with events that have made a significant contribution to the broad patterns of our history; or (B) that are associated with the lives of persons significant in our past; or (C) that embody the distinctive characteristics of a type, period, or method of construction, or that possess high artistic values, or that represent a significant distinguishable entity whose components may lack individual distinction; or (D) that have yielded or may be likely to yield, information important in history or prehistory.

Under CEQA a substantial adverse change in the significance of a historical resource, as a result of a project or development, is considered a significant impact on the environment. Substantial adverse change is defined as physical demolition, relocation, or alteration of a resource or its immediate surroundings such that the significance of the historical resource would be materially impaired. Direct impacts are those that cause substantial adverse physical change to a historic property. Indirect impacts are those that cause substantial adverse change to the immediate surroundings of a historical resource, such that the significance of a historical resource would be materially impaired.

Per CEQA (15064.5 (b)(4)), a project that follows *The Secretary of the Interiors Standards for the Treatment of Historic Properties with Guidelines for Rehabilitating Historic Building* shall be considered as mitigated to a level of less than significant impact on historical resources.[35] The modifications made to contributing components of Cleveland HS would adhere to these standards per LAUSD Standard Conditions of Approval.

The analysis presented in this section is based on the information provided in the *Historic Resources Survey Report,* prepared for this Project by Sapphos Environmental, Inc., dated June 2014, and the *Character-Defining Features Memorandum* (CDFM) for Grover Cleveland High School, 8140 Vanalden Avenue, Reseda, CA 91335, prepared for this project by PCR Services Corporation in July 2015. Both documents can be found in Appendix C of this IS.

[35] Weeks, Kay D. and Ann E. Grimmer. The Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Rehabilitating Historic Building. U.S. Department of the Interior, National Park Service; 1995.

a) Less than Significant Impact. In March 2014, the campus was found eligible for the NRHP and CRHR through a survey evaluation. It was determined to qualify as a Historic District. The contributing elements of the district were defined as the complex of buildings and structures that form the campus core, specifically consisting of the site plan and landscape elements. Cleveland HS was found to be a good example of a finger- and cluster-designed campus, which is characterized by pavilion-like classroom wings "clustered" around courtyards with axial classroom wings connected by a central corridor. In addition to this historic plan, the following buildings were found to be contributing components to the district: Classroom Building 1; Library Building 2; Classroom Building 3; Administrative Building 6; Classroom Buildings 7 through 10, Buildings 4 and 5; Building 11; Building 13; Multi-Purpose Building 12, Student Store Building 15, Classroom Building 18; Building 16; Building 17; Classroom Building 20; and Physical Education Building 21. The campus was found to be eligible within the context of the following broad patterns in history during its period of significance from 1959 through 1960.[36]

Historic Context

Educating the Baby Boom: The Postwar Modern, Functionalist School Plant (1945–1969). The massive population increase in California following the end of World War II was brought on by a combination of the post-war baby boom and an influx of new residents from other parts of the United States to the greater Los Angeles area. Growth especially impacted the San Fernando Valley, where Cleveland HS is located, which swiftly turned from farmlands into subdivisions providing badly needed housing. In 1961, LAUSD was created, combining the elementary and high schools under a single unifying system. The expansion of the built environment during this period was exceptional, as development and infrastructure raced to keep up with increasing demand. Enormous pressure was put on education facilities to expand as the baby boomers began to enter school. Part of the response to the dramatic shortage of schools and classrooms was a standardization of ideas about school design across the country. This new uniformity was facilitated through the creation of organizations, journals, and guidebooks dedicated to developing and disseminating ideas on school design. The type of school advocated was a modern school of contemporary design, with a decentralized plan, low massing, indoor/outdoor space, natural light and ventilation, and an informal character. The three primary plan types used during this period were the finger plan, the cluster plan, and the open plan, all of which emphasized the aforementioned design goals. These schools were generally constructed where land was plentiful and are characterized by sprawling, low main buildings or clusters of buildings connected by covered walkways and possessing individual patios or open courtyards, encouraging air circulation and taking maximum advantage of the local climate. One-story buildings also substantially reduced the overall superstructure needed and consequently reduced earthquake and fire risk, as access to the outdoors was readily available. Cleveland HS exemplifies many of these design concepts in its site plan and architecture.[37]

Cleveland High School Construction History

The first plans for Cleveland HS were drawn by Charles O. Matcham, Stewart S. Granger and Associates, Architects and Engineers, in December 1957. The school was constructed on an irregularly shaped lot, with most of the school buildings located at the north end of the property. The school was laid out in essentially a finger plan, with a main arcade serving as the primary artery connecting a series of buildings on either side of a covered walkway. The wider southern end of the lot was primarily devoted to outdoor sporting activities. Cleveland HS was constructed in phases, spreading construction of the buildings around the arcade over several years and continuing into the late 1960s. The first phase of construction, circa 1957 to 1958, resulted in establishment of the site plan and layout of the entire campus and the design. Phases 2 and 3 were detailed in architectural drawings dated April 1958 and July 1958, respectively.[38]

A fire in the early 1980s required repairs to the Administrative Building (Building 6). In 1988, Gensler and Associates/Architects designed a new community indoor swimming pool. In the aftermath of the 1994

[36] Sapphos Environmental, Inc., Los Angeles Unified School District: Historic Resources Survey Report (June 2014).
[37] Sapphos Environmental, Inc., Los Angeles Unified School District: Historic Context Statement, 1870 to 1969 (March 2014).
[38] PCR Services Corporation. Character-Defining Features Memorandum (CDFM) for Grover Cleveland High School, 8140 Vanalden Avenue, Reseda, CA 91335 (July 2015).

Northridge earthquake, several measures were taken to stabilize and repair various school buildings between 1995 and 1996. Earthquake repair occurred throughout the campus, including to the Physical Education Building (Building 21), arcades, multiple classroom buildings, the Greenhouse, Student Store (Building 15), Cafeteria (Building 14), and Administrative Building (Building 6). Repairs were also made to the hardscape and athletic fields. As part of this work, the Agricultural Shed was demolished.[39]

Historical Significance

The campus core of Cleveland HS appears eligible as a historic district under NRHP and CRHR Criteria A/1 in the context of institutional architecture/educational facilities in Los Angeles (1945–1969). As an intact, indoor-outdoor finger-plan school, Cleveland HS exemplifies LAUSD design ideals and principles of the era. The school is also eligible as a historic district under Criteria A/1 and C/3 as an excellent example of Mid-Century Modern style applied to institutional architecture.

Impacts Assessment

LAUSD is proposing to modify Classroom Buildings 3, 4, and 5 and the Physical Education Building 21. Several buildings would be demolished, including Buildings 11, 13, 16, and 17; the Multi-Purpose Building 14; and Student Store Building 15, all of which contribute to the NRHP and CRHR eligibility of Cleveland HS. Classroom Buildings 3, 4, and 5 are adjacent to each other in the western portion of the campus core; the Physical Education Building 21 is located in the southern portion of the campus core; Buildings 11, 13, and 16 are located in the eastern portion of the campus core; Buildings 17, 14, and 15 are located in the central portion of the campus core.

The modification of Buildings 4 and 5 would be an interior remodel consisting of converting old science classrooms into general classrooms. The modification of Building 21 would consist of structural and accessibility upgrades following the Secretary of the Interior's Standards. All new upgrades would fit with the overall interior design, new additions would be concealed where possible, and any damaged surfaces would be repaired with in-kind materials. Exterior alterations would include painting existing buildings and repair of deteriorating brick work. The colors of trim and stucco would be consistent with colors used in mid-century modern architecture. The brick work would be stabilized using approved methods for repair of historic buildings. The original buildings within the historic core would maintain their cohesive appearance, plan, and design.

Buildings 11 and 13 would be demolished and replaced with a new one-story food service building. Buildings 16 and 17 would be demolished and replaced with a new one-story performing arts center and open air quadrangle. Buildings 14 and 15 would be demolished and replaced with a new two-story science building. In total, seven new buildings would be constructed within the campus core. New buildings would be integrated into the historic district encompassing the campus core. As required by the Secretary of the Interior's Standards, new structures would be compatible in size, scale, and massing to the existing buildings. Three-story structures would be located away from the campus core to maintain the existing scale and massing of the campus; similar design elements and materials exhibited in the existing buildings would be incorporated in the new construction to maintain the existing appearance of the campus. All new buildings would be compatible in design, yet differentiated from the existing buildings as required by the Secretary of the Interior's Standards.

Buildings 11, 13, 14, 15, 16, and 17 are slated for demolition. Demolition of contributing components of the historic district could result in potentially significant impacts to this eligible historical resource. Because Buildings 11 and 13 are both tertiary contributing elements of the historic district, which are not located within the core of the campus, their removal would not materially impair or detract from the overall site plan and the character-defining finger and cluster plans for which the district is eligible. Buildings 16, 17, 14, and 15 are all located in proximity to the historic core of the campus, east of the main pedestrian artery that bisects the campus. All four buildings are contributing elements considered to be tertiary components of the historic district, and their removal would result in an adverse impact, but would not materially impair

[39] PCR Services Corporation. Character-Defining Features Memorandum (CDFM) for Grover Cleveland High School, 8140 Vanalden Avenue, Reseda, CA 91335 (July 2015).

or detract from the overall site plan or character-defining features, or diminish the historic character of the district, if the design of new construction is compatible with the old. The historic district would maintain its eligibility.

As proposed, the new buildings would be similar in size and height to the postwar modern-style campus structures, and the removal of tertiary components of the district would not substantially impact the existing relationship between the remaining historical buildings, site plan, and setting. The character of the setting, landscape elements, pathways, and important views and visual relationships would be retained if the design implemented is compatible with the existing buildings and campus layout in size, scale, and massing as required by the Secretary of the Interior's Standards. Despite removal of Buildings 11, 13, 16, 17, 14, and 15, Cleveland HS would remain eligible for the CRHR under Criteria 1/3 because the key elements and most of the contributing components would remain intact, and new construction and landscaping would be integrated and would not substantially detract from the eligibility of the school as a historical resource.

Contributing components would be removed from the school site under the Project; therefore, adverse impacts to historical resources would occur; however, with implementation of -SC-CUL-1, SC-CUL-2, SC-CUL-3, SC-CUL-~~4~~8, ~~SC-CUL-9,~~ SC-CUL-~~5~~10, and SC-CUL-~~13-~~8 described in further detail below, the impacts would be reduced to a less than significant level because the eligibility of the school site as a whole would be retained. The SCs would involve development of compatible design for new construction; documentation prior to demolition of Buildings 11, 13, 16, 17, 14, and 15 detailing important information about their postwar modern architecture; and provision of copies of this IS/MND to the California Office of Historic Preservation (OHP).

With implementation of SC-CUL-1, SC-CUL-2, SC-CUL-3, SC-CUL-~~4~~8, ~~SC-CUL-9,~~ SC-CUL-~~5~~10, SC-CUL-~~6~~11, AND SC-CUL-~~13~~8, potential impacts related to historical resources would be less than significant. No mitigation measures or further evaluation are required.

b) Less than Significant Impact. An archaeological resource is defined in Section 15064.5(c) of the CEQA Guidelines as a site, area, or place determined to be historically significant as defined in Section 15064(a) of the CEQA Guidelines, or as a unique archaeological resource defined in Section 21083.2 of the PRC as an artifact, object, or site that contains information needed to answer important scientific research questions of public interest, or that has a special and particular quality, such as being the oldest or best example of its type, or that is directly associated with a scientifically recognized important prehistoric or historic event or person.

The Project as currently proposed would not include excavation into previously undisturbed native soils, because the Project site includes areas with existing structures and a turf field, with no known archaeological context and which has been subject to past subsurface disturbance associated with grading and construction of foundations. It is unlikely that undisturbed unique archaeological resources exist on the Project site; however, grading activities associated with development of the Project could cause new subsurface disturbance and could result in the unanticipated discovery of archaeological resources. In the event of an unexpected discovery, implementation of SC-CUL-~~13-~~8 (see previous section for condition description) and SC-CUL-10~~5~~ would ensure that impacts to archaeological resources would be less than significant.

With implementation of SC-CUL-8~~13~~, SC-CUL-~~14~~9, and SC-CUL-~~15~~10, potential impacts related to archaeological resources would be less than significant. No mitigation measures or further evaluation are required.

c) Less than Significant Impact. As discussed above, in the Response to Checklist Question V.b, the Project would not include excavation into previously undisturbed native soils because the Project site is located in an area with existing structures and a turf field, with no known paleontological context, and has been subject to past subsurface disturbance associated with grading and construction of foundations. It is unlikely that undisturbed unique paleontological or geologic resources exist in the Project area; however, grading activities associated with development of the Project could cause new subsurface disturbance and could result in the unanticipated discovery of unique paleontological resources. In the event of an

unexpected disturbance, implementation of SC-CUL-~~19~~ 14 would ensure that impacts to paleontological resources would be less than significant.

With implementation of SC-CUL-~~19~~14, potential impacts related to paleontological resources would be less than significant. No mitigation measures or further evaluation are required.

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

Pursuant to California Health and Safety Code Section 7050.5, the coroner shall make his or her determination within 2 working days of notification of the discovery of the human remains. If the coroner determines that the remains are not subject to his or her authority and recognizes or has reason to believe that they are those of a Native American, he or she shall contact the Native American Heritage Commission (NAHC) by telephone within 24 hours. Compliance with existing regulations would ensure that impacts to human remains would be less than significant. No mitigation measures or further study are required.

4.6. Geology/Soils

The following analyses of geology and soils are based on the findings from the technical report *Preliminary Geotechnical Report Proposed Comprehensive Modernization Project* (Geotechnical Report) prepared for LAUSD by Converse Consultants on July 22, 2015. The Geotechnical Report (refer to Appendix D of this IS) provides the geologic evaluation and geotechnical analysis of the proposed Project, as well as the project vicinity.

ENVIRONMENTAL ISSUE	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
VI. GEOLOGY AND SOILS: Would the project:				
a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☒	☐
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 potentially 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?	☐	☐	☐	☒

The Program EIR includes Standard Conditions for minimizing impacts to geology and soils in areas where projects would be implemented under the SUP. Applicable Standard Conditions related to geology and soils impacts for the proposed Project are listed below.

SC-GEO-1 **OEHS CEQA Specification Manual, Appendix G, Supplemental Geohazard Assessment Scope of Work.** This document outlines the procedures and scope for LAUSD geohazard assessments.

SC-HWQ-1 **Stormwater Technical Manual.** This manual establishes design requirements and provides guidance for the cost-effective improvement of water quality in new and significantly redeveloped LAUSD school sites. These guidelines are intended to improve water quality and mitigate potential impacts to the Maximum Extent Practicable (MEP). While these guidelines meet current post-construction Standard Urban Stormwater Mitigation Plan (SUSMP) requirements. The guidelines address the mandated postconstruction element of the NPDES program requirements.

SC-HWQ-2 **Compliance Checklist for Stormwater 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 an SWPPP; BMPs for minimizing stormwater pollution to be specified in an SWPPP; and monitoring stormwater discharges to ensure that sedimentation of downstream waters remains within regulatory limits.

a) **i. Less than Significant Impact.** According to the Preliminary Geotechnical Report for the proposed Project, Cleveland HS is not located within a currently designated State of California Earthquake Fault Zone (Alquist-Priolo Special Studies Zones) for surface fault rupture. No surface faults are known to project through or towards the site. The closest known faults to the Project site with a mappable surface expression are the Santa Susana Fault located approximately 6 miles to the north, the Sierra Madre-San Fernando Fault system located approximately 7 miles to the north, and the Verdugo Fault located approximately 7 miles to the east. Design and construction of new buildings would comply with seismic safety requirements of the DSA and the California Building Code (CBC). Compliance with DSA and CBC requirements, as well as implementation of SC-GEO-1, would ensure that potential hazards from strong seismic ground shaking would be less than significant. No mitigation measures or further evaluation are required.

ii. Less than Significant Impact. The proposed Project site is situated within a seismically active region. As is the case for most areas of southern California, ground shaking from earthquakes associated with nearby and more distant faults may occur during the lifetime of the Project. The Preliminary Geotechnical Report (July 2015) completed for the proposed Project provides earthwork and site grading recommendations for Project construction. Design and construction of new buildings would comply with seismic safety requirements of the DSA and CBC. Compliance with DSA and CBC requirements, as well as implementation of SC-GEO-1, would ensure that potential hazards from strong seismic ground shaking would be less than significant. No mitigation measures or further evaluation are required.

iii. No Impact. The Preliminary Geotechnical Report (July 2015) for the Project concluded that moderately stiff clayey soils were encountered at the Project site, which are not considered susceptible to liquefaction. In addition, according to the State of California Seismic Hazard Zones Map, the site is not located within an area of potential liquefaction. Implementation of the Project would not expose people or structures to substantial hazards from seismic-related ground failure, including liquefaction; therefore, there would be no impact. No mitigation measures or further evaluation are required.

iv. No Impact. According to the State of California Seismic Hazard Zones Map (dated February 1, 1998), the Project site is not susceptible to liquefaction or earthquake-induced landslides. Furthermore, LAUSD

policy dictates that schools will not be constructed in areas that are prone to landslides[40]. The Preliminary Geotechnical Report completed for the Project concluded that the Project site is very flat and, in the absence of significant ground slopes, there is no potential for seismically induced landslides to affect the Project site. Implementation of the Project would not expose people or structures to substantial adverse hazards due to landslides, and there would be no impact. No mitigation measures or further evaluation are required.

b) Less than Significant Impact. The proposed Project would not result in substantial soil erosion or loss of topsoil. The native topsoil was removed and/or compacted during development of the school campus; therefore, redevelopment of the school campus would not result in the loss of topsoil. The proposed Project includes new construction of buildings and would involve earthmoving activities such as excavation, grading, and trenching, which would create the potential for soil erosion. Construction projects of one acre or more are regulated under the National Pollutant Discharge Elimination System (NPDES) General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities (Order No. 2012-0006-DWQ) issued by the State Water Resources Control Board. Project applicants obtain coverage by developing and implementing a SWPPP, estimating sediment risk from construction activities to receiving waters, and specifying BMPs that would be incorporated into the construction plan to minimize stormwater pollution. The school campus is 37 acres and less than 5-acres contiguous at a time would be disturbed; thus, Project construction would be subject to the Statewide General Construction Permit and implementation of BMPs specified in the SWPPP. This is also required under SC-HWQ-2.

Implementation of SC-GEO-1 and the recommendations noted in the Preliminary Geotechnical Report prepared for this Project would significantly reduce Project-related soil erosion. The Project would be required to develop and maintain an SWPPP with BMPs to comply with the Construction General permit and as required by the NPDES general permit, as outlined in SC-HWQ-1 (Stormwater Technical Manual) and SC-HWQ-2 (Compliance Checklist for Stormwater Requirements at Construction Sites). LAUSD developed a program wide SWPPP in 2005 (updated in 2007 and 2009). This plan would prevent or minimize stormwater runoff pollution, contamination, or nuisance from school construction projects as defined in California Water Code Section 13050. As such, soil erosion impacts would be less than significant with implementation of these Standard Conditions and recommendations and would not result in the loss of topsoil. No mitigation measures or further evaluation are required.

c) Less than Significant Impact. Fault rupture is the displacement that occurs along the surface of a fault during an earthquake. The California Geological Survey has established earthquake fault zones, known as Alquist-Priolo Earthquake Fault Zones, around the surface traces of active faults to assist cities and counties in planning, zoning, and building regulation functions. These zones identify areas where potential surface rupture along an active fault could prove hazardous and identify where special studies are required to characterize hazards to habitable structures.

As described in the discussion in Subsection (a)(i), the Project site is not located within a currently designated State of California Earthquake Fault Zone (Alquist-Priolo Special Studies Zones) for surface fault rupture.[41] The closest known faults to the Project site with a mappable surface expression are the Santa Susan Fault located approximately 6 miles to the north, the Sierra Madre-San Fernando Fault system located approximately 7 miles to the north, and the Verdugo Fault located approximately 7.5 miles to the east. The potential for surface rupture resulting from movement of the nearby major faults is considered remote. The Preliminary Geotechnical Report prepared for the proposed Project recommends site-specific measures, as appropriate, to reduce the risk of seismic-related hazards and examines the potential for various hazards, including caving, ground motion, liquefaction, dynamic settlement, inundation, and landslides. Furthermore, the DSA reviews designs for new school construction, and all projects must submit to DSA oversight and inspections during construction. The DSA must then certify that each new school building meets State of California statutory safety requirements. Design and construction of new

[40] LAUSD SUP Final EIR, September 2015.
[41] Preliminary Geotechnical Report, Converse Consultants, July 22, 2015.

buildings would comply with seismic safety requirements of the DSA and CBC. Compliance with DSA and CBC requirements, as well as implementation of SC-GEO-1, would ensure that potential hazards from strong seismic ground shaking would be less than significant. No mitigation measures or further evaluation are required.

d) Less than Significant Impact. As noted in the discussion in Subsection (a)(iii), the Project site is not considered susceptible to liquefaction due to the moderately stiff clayey soils at the Project site. With implementation of the earthwork and site grading recommendations from the Preliminary Geotechnical Report and SC-GEO-1, impacts associated with unstable geology or unstable soils would be less than significant. No mitigation measures or further evaluation are required.

The upper 5 feet of soils have a "very low" expansion potential based on the findings of the Preliminary Geotechnical Report prepared for this school site. Mitigation for expansive soil may be necessary. As with all new classroom construction, site-specific geotechnical studies would be undertaken, including soil samples, to test for expansion potential, and geotechnical recommendations would be detailed, which may include ground stabilization, selection of appropriate foundation type and depths, and selection of appropriate structural systems. With implementation of these design practices and requirements, as well as SC-GEO-1, impacts associated with expansive soil would be less than significant. No mitigation measures or further evaluation are required.

e) No Impact. There is an existing underground site sewer (built in 1959-1960), which would be replaced with the proposed Project. There are no septic tanks or alternative waste water disposal systems proposed with this Project. As such, there would be no impact in this regard, and no mitigation measures or further evaluation are required.

4.7. Greenhouse Gas Emissions

ENVIRONMENTAL ISSUE	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
VII. GREENHOUSE GAS EMISSIONS: Would the project:				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☒	☐
b) Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☒	☐

The Program EIR includes Standard Conditions for minimizing impacts to greenhouse gases (GHGs) in areas where projects would be implemented under the SUP. Applicable Standard Conditions related to GHG impacts for the proposed Project are listed below.

SC-GHG-1 During school operation, LAUSD shall perform regular preventive maintenance on pumps, valves, piping, and tanks to minimize water loss.

SC-GHG-2 LAUSD shall utilize automatic sprinklers set to irrigate landscaping during the morning and evening hours to reduce water loss from evaporation.

SC-GHG-3 LAUSD shall reset automatic sprinkler timers to water less during cooler months and the rainy season.

SC-GHG-4 LAUSD shall develop a water budget for landscape (both nonrecreational and recreational) and ornamental water use to conform to the City of Los Angeles Water Efficient Landscape Ordinance (No. 170978).

SC-GHG-5 LAUSD shall ensure that the time-dependent valued energy of the proposed project design is at least 10 percent, with a goal of 20 percent less than a standard design that is in minimum compliance with the California Title 24, Part 6 energy efficiency standards that are in force at the time the project is submitted to the DSA.

Global climate change refers to changes in average climatic conditions on Earth as a whole, including changes in temperature, wind patterns, precipitation and storms. GHGs are those compounds in the Earth's atmosphere that play a critical role in determining temperature near the Earth's surface. GHGs include carbon dioxide (CO_2), methane (CH_4), O_3, water vapor, nitrous oxide (N_2O), hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride (SF_6). Specifically, these gases allow high-frequency shortwave solar radiation to enter the Earth's atmosphere but retain some of the low frequency infrared energy, which is radiated back from the Earth towards space, resulting in a warming of the atmosphere. This phenomenon is known as the greenhouse effect. Increased concentrations of GHGs in the Earth's atmosphere have been linked to global climate change and such conditions as rising surface temperatures, melting icebergs and snowpack, rising sea levels, and increased frequency and magnitude of severe weather conditions. Existing climate change models also show that climate warming portends a variety of impacts on agriculture, including loss of microclimates that support specific crops, increased pressure from invasive weeds and diseases, and loss of productivity due to changes in water reliability and availability. In addition, rising temperatures and shifts in microclimates associated with global climate change are expected to increase the frequency and intensity of wildfires. Significant scientific uncertainty continues concerning the extent to which increased concentrations of GHGs have caused or will cause climate change, and over the appropriate actions to limit and/or respond to climate change.

No individual project is large enough to single-handedly result in a significant increase in global concentrations of GHGs, as GHG emissions related to a project are not confined to a particular air basin but are dispersed worldwide. As such, by their nature, project-related climate change impacts contribute cumulatively to this impact, through direct and indirect GHG emissions.

CEQA requires lead agencies to evaluate potential environmental effects based to the fullest extent possible on scientific and factual data. Significant conclusions must be based on substantial evidence, which includes facts, reasonable assumptions predicated upon facts, and expert opinion supported by facts.

The primary State and regional plans for reducing GHG emissions include Assembly Bill (AB) 32 (Scoping Plan) prepared by the California Air Resources Board (ARB) and the 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) prepared by SCAG. The ARB AB 32 Scoping Plan contains the main strategies to achieve the 2020 emissions cap. The Scoping Plan was developed by ARB with input from the Climate Action Team, and it included a comprehensive set of actions designed to reduce overall carbon emissions in California, improve the environment, reduce oil dependency, diversify energy sources, and enhance public health while creating new jobs and improving the State economy. The GHG reduction strategies contained in the Scoping Plan include direct regulations, alternative compliance mechanisms, monetary and nonmonetary incentives, voluntary actions, and market-based mechanisms such as a cap-and-trade system.

The 2016-2040 RTP/SCS includes a strong commitment to reduce regional GHG emissions. Goals and policies included in the RTP/SCS are generally related to transportation and consist of adding density in proximity to transit stations, mixed-use development, and encouraging active transportation (i.e., nonmotorized transportation such as bicycling).

a) Less than Significant Impact. Implementation of the proposed Project would add approximately 63,310 square feet of new buildings and remodel approximately 42,000 square feet of buildings at an existing campus. Based on the anticipated increase in floor area of the school, and associated building operation and maintenance energy, GHG emissions from the proposed Project would incrementally increase. The proposed Project would incorporate standards developed by the CHPS, with goals established for the proposed Project for energy and water efficiency, drought-tolerant landscaping, and material reuse and recycling. The GHG emissions of the proposed Project would not be cumulatively considerable. GHG emissions generated by the proposed Project are considered less than significant. No mitigation measures or further evaluation are required.

b) Less than Significant Impact. The proposed Project would be consistent with plans adopted to reduce GHG emissions, such as SCAG's 2016-2040 RTP/SCS, California AB 32, ARB's 2008 Scoping Plan, and other statewide strategies. The proposed Project would fulfill the educational needs of local communities. With no increase in the planned student capacity, the Project would not induce growth. Thus, the Project would be consistent with the goals of the 2016-2040 RTP/SCS.

The proposed Project would comply with GHG emissions reduction measures. In furtherance of such measures, LAUSD's *School Design Guide* requires construction contractors to reuse, recycle, and salvage nonhazardous materials generated during demolition or new construction, as materials recovery would minimize the need to produce and transport new materials, thereby reducing emissions from mobile sources and energy use. Implementing LAUSD's *School Design Guide* and SC-GHG-1, SC-GHG-2, SC-GHG-3, SC-GHG-4, and SC-GHG-5 would ensure that the proposed Project was consistent with plans, policies, and regulations adopted to reduce GHG emissions. No mitigation measures or further study are warranted.

4.8. Hazards & Hazardous Materials

The following analysis of hazards and hazardous materials is based on the findings from the technical report *Phase I Environmental Site Assessment Report, Cleveland Charter High School, 8140 Vanalden Avenue, Reseda, CA 91335* (Phase I ESA) prepared for LAUSD by Ninyo & Moore on August 16, 2016. The Phase I ESA (Appendix E) provides the hazards and hazardous materials evaluation and analysis for the proposed Project site, as well as the Project vicinity.

ENVIRONMENTAL ISSUE	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
VIII. HAZARDS AND HAZARDOUS MATERIALS: Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐
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 0.25 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 2 miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	☐	☐	☐	☒
f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?	☐	☐	☐	☒
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?	☐	☐	☐	☒

a) Less than Significant Impact. The Project would involve the transport, storage, use, or disposal of limited quantities of hazardous materials, such as fuels, lubricants, solvents and degreasers, and paints. At the construction site, activity would be short term or one time in nature and would be governed by existing regulations of several agencies, including the U.S. Environmental Protection Agency (EPA), U.S. Department of Transportation (DOT), Occupational Safety and Health Administration (OSHA),

California Division of Occupational Safety and Health (Cal/OSHA), California Department of Toxic Substances Control (DTSC), and the LAFD.

Once the Project is completed and operational, hazardous materials that would 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. The amounts of hazardous materials handled during school operations are limited, reducing the potential of an accident during transport, storage, or handling. LAUSD will continue to implement its existing programs, practices, and procedures for handling hazardous materials.

An important component of the proposed Project is to eliminate hazards associated with asbestos and lead-based paint (LBP) in existing buildings that would be demolished or modernized. The Phase I ESA conducted for the Project indicated that Asbestos Management and Abatement Plans were observed in the Administration building of the existing facility. Onsite asbestos-containing materials (ACMs) and LBP would be managed separately during the planned demolition, construction, and renovation activities by following the existing management plans under the LAUSD Facilities Environmental Technical Unit (FETU) supervision.

As with asbestos, the Project would be reviewed by FETU for impacts to LBP prior to initiation of construction activities. All coated surfaces (i.e., paint, varnish, or glazed) are assumed to contain lead, and work that impacts coated surfaces must be performed by properly trained individuals. FETU would ensure that specific handling procedures for building materials that may contain lead are followed. LAUSD Section 13282: Lead Abatement and Lead Related Construction Work (March 15, 2007) and LAUSD Section 13614: Abatement of Hazardous Materials (July 7, 2003) would be implemented as needed.

Polychlorinated biphenyls (PCBs) were historically used as coolants, insulating materials and lubricants in electrical materials, such as transformers. With regard to PCBs, the *Phase I ESA* indicated that there were several on-site pad-mounted transformers installed prior to 1979. The City of Los Angeles Department of Public Works certified that the transformers in the transformer station do not contain PCBs[42]. PCBs were also used widely in caulking and elastic sealant materials, particularly from 1950 through the 1970's until PCBs were banned in 1979. DTSC guidance indicates that PCBs may exist in soil near exterior caulking present in buildings meeting the age criteria and adjacent unpaved areas.

Nevertheless, if PCBs are identified during demolition and construction activities on the Project site, an assessment will be performed in accordance with the Guidelines and Procedures to Address Polychlorinated Biphenyls (PCBs) in Building Materials, October 2016[43] and LAUSD Design Standards, Specification Document 02 8400 Polychlorinated Biphenyl (PCB) Remediation, Rev 3.0, Revised February 1, 2017[44]. The Preliminary Environmental Assessment Equivalent identified six areas where lead, arsenic, or trichloroethene concentrations exceeded screening levels. Impacted soil was removed and transported to an authorized landfill in April 2017.[45] If additional impacted soil is discovered, it would be removed/remediated to the satisfaction of the LAUSD OEHS. 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, students, school employees, and the general public. Though additional discoveries of contamination during construction are not anticipated, if potential discoveries occur, work would be stopped and LAUSD OEHS would be immediately notified. LAUSD OEHS would arrange for an environmental assessment to determine the nature and extent of the contamination and the type of remediation required. Such requirements would be incorporated into the design and operation of the Project, such as providing for

[42] Pinnacle Environmental technologies. 2016. Grover Cleveland Charter High School, Workplan for A Preliminary Environmental Assessment Equivalent.
[43] Available at http://achieve.lausd.net/Page/3495
[44] Available at http://achieve.lausd.net/Page/3495
[45] Pinnacle Environmental technologies. 2017. Grover Cleveland Charter High School, Technical Memorandum on Housekeeping Activities.

and maintaining appropriate storage areas for hazardous materials and installing or affixing appropriate warning signs and labels. Therefore, the proposed Project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. No mitigation measures or further evaluation are required.

b) Less than Significant Impact. The proposed Project may require the use of hazardous materials in small quantities during construction and operation of the facility, as explained in the discussion above in Checklist Question VIII(a). 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. Compliance with applicable laws, regulations, and implementation of LAUSD policies and practices during Project construction and operation would ensure that impacts associated with the accidental release of hazardous materials are less than significant. The Phase I ESA indicated the potential for the following recognized environmental concerns (RECs) in connection with the site:

- Two inactive clarifiers associated with former automotive shop classes near Buildings A and N and an interceptor near the Media Center Building.
- The suspected presence of former hydraulic lifts in Building N.
- Persistent termiticides and lead, which may be present in shallow soil around building foundations.
- PCB-containing materials possibly present from onsite pad-mounted transformers installed prior to 1979.
- Arsenic in shallow soil underneath asphalt concrete (AC) pavement.
- An east-west, high-pressure natural gas distribution pipeline along Roscoe Boulevard about 300 feet north of the site.
- A north-south, high-pressure natural gas transmission pipeline along Wilbur Street about 500 feet east of the site.
- Within 100 feet of the electromagnetic fields adjacent to the power lines east of the site.

Initial soil sampling was completed on November 22, 2016[46] (see Appendix H). Organochlorine pesticides detected in soil samples did not exceed the residential risk levels and no further analysis was required. Lead and arsenic exceeded regulatory thresholds at four out of 76 locations. Additional sampling defined the impacted area. Based on the results of the additional soil sampling and health screening, removal and off-site disposal of approximately 5.5 cubic yards of fill material with elevated arsenic and lead concentrations was recommended. The removal action was completed in April 2017[47] (see Appendix J).

The high pressure natural gas pipeline along Roscoe Boulevard is not anticipated to impact the Project since it isn't located close to the development zone.

An electromagnetic field (EMF) survey was conducted to evaluate the EMF exposure levels associated with the Los Angeles Department of Water and Power multi-circuit 230 kV overhead transmission line located east of the site.[48] The proposed Project has both restricted uses (parking, etc.), and unrestricted uses (classrooms, etc.), within the 150-foot setback prescribed for the 230- kV powerlines[49]. The EMF survey indicated the average of the school site EMF levels measured at the 100 and 200-foot setbacks from the right-of-way were ~ 0.95 mG, which is equivalent to the published average exposure at public schools in California (<1 mG). Therefore, the proposed Project does not exacerbate the existing conditions with respect to EMF exposure. Rather, the Project design would substantially improve the current condition by locating classrooms about 132 feet away from the transmission line; whereas, the school site as it is currently configured has portable classrooms located within 38 feet of the transmission line. As such, the proposed

[46] Pinnacle Environmental technologies. 2017. Grover Cleveland Charter High School, Preliminary Environmental Assessment Equivalent Report.
[47] Pinnacle Environmental technologies. 2017. Grover Cleveland Charter High School, Technical Memorandum on Housekeeping Activities.
[48] Placeworks. 2016. EMF Survey Cleveland Charter High School, Reseda, California.
[49] California Code of Regulation, Title 5, Article 2, Section 14010(c). http://www.cde.ca.gov/ls/fa/sf/title5regs.asp

Project does not exacerbate the existing conditions with respect EMFs and impacts are less than significant. No mitigation measures or further evaluation are required.

c) Less than Significant Impact. Earthwork, grading, and installation activities during Project construction are not anticipated to release hazardous materials into the surrounding environment nor handle significant quantities of hazardous or acutely hazardous materials, substances, or waste. Contaminants that could become airborne during demolition and hauling (i.e., ACM, LBP, PCBs or pesticides) would be removed in accordance with DTSC, SCAQMD, and LAUSD requirements prior to demolition activities; therefore, emissions impacts to the existing school and other existing schools (Blythe Street Elementary School and John R. Wooden High School) within 0.25 mile of the Project would be less than significant.

The Project would not introduce hazardous materials during operation of the school that are not already being used and stored in small quantities at the existing school; therefore, emission impacts near schools would be less than significant. No mitigation measures or further evaluation are required.

d) No Impact. Modernization of the existing campus would not involve the acquisition or leasing of new properties for school construction; therefore, because the existing campus is not currently included on a list of hazardous materials site, no evaluation is necessary to determine whether the Project is included on such a list. Compliance with applicable laws, regulations, and implementation of LAUSD policies and practices would ensure that hazardous materials sites on or in the vicinity of the Project site are identified prior to Project construction. No mitigation measures or further evaluation are required.

e) No Impact. The Project is not located within an airport land use plan, nor is it located within 2 miles of a public or public use airport. The closest airport is Van Nuys Airport, which is located approximately 3 miles from the Project site. No impacts are anticipated with implementation of the proposed Project. No mitigation measures or further evaluation are required.

f) No Impact. The Project site is not located near a private airstrip or heliport or helistop. No impacts are anticipated with implementation of the proposed Project. No mitigation measures or further evaluation are required.

g) Less than Significant Impact. Project construction would be conducted within the existing school site and would not affect emergency access into the community surrounding the school. During construction, emergency response procedures would be governed by LAUSD's emergency response protocol and the contractor's emergency response plan. LAUSD emergency response plans, policies, and guidance would remain in place before, during, and after Project construction. The school safety plan for Cleveland HS would be updated to reflect changed conditions as a result of the modernization Project. In addition, schools are considered critical community facilities and are often used as evacuation centers during disasters. The proposed Project would have a favorable impact on emergency response by improving the school in conformance with current, stringent seismic standards as they are used as evacuation centers in the event of a disaster. Finally, the Project would conform to local ordinances and would not interfere with an existing emergency response or evacuation plan. No mitigation measures or further evaluation are required.

h) No Impact. The proposed Project is located on an existing LAUSD school property in a highly developed, urban area. According to the California Department of Forestry and Fire Protection's Fire Hazard Severity Zone Map,[50] the Project site is outside the Very High Fire Hazard Severity Zone. The Project site is in an urbanized area that is not near natural vegetation areas or adjacent to residences intermixed with wildlands. Accordingly, the Project would not expose people or structures to a significant risk of loss, injury, or death involving wildland fires; therefore, no impact would result. No mitigation measures or further evaluation are required.

[50] State of California Department of Forestry and Fire Protection, September 2011.

4.9. Hydrology/Water Quality

ENVIRONMENTAL ISSUE	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
IX. HYDROLOGY AND WATER QUALITY: Would the project:				
a) Violate any water quality standards or waste discharge requirements?	☐	☐	☒	☐
b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of 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)?	☐	☐	☐	☒
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 a 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?	☐	☐	☐	☒

The Program EIR includes Standard Conditions for minimizing impacts to hydrology and water quality in areas where projects would be implemented under the SUP. Applicable Standard Conditions related to hydrology and water quality impacts for the proposed Project are listed below.

SC-HWQ-1 **Stormwater Technical Manual.** This manual establishes design requirements and provides guidance for the cost-effective improvement of water quality in new and significantly redeveloped LAUSD school sites. These guidelines are intended to improve water quality and mitigate potential impacts to the MEP. While these guidelines meet current postconstruction SUSMP requirements, the guidelines address the mandated postconstruction element of the NPDES program requirements.

SC-HWQ-2 **Compliance Checklist for Stormwater 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 an SWPPP; BMPs for minimizing stormwater pollution to be specified in an SWPPP; and monitoring stormwater discharges to ensure that sedimentation of downstream waters remains within regulatory limits.

a) Less than Significant Impact. The proposed Project involves the demolition of existing buildings; construction, modernization, and seismic retrofit of school facilities; and sitewide infrastructure upgrades with no increase in planned student capacity. This Project would not violate any water quality standards or waste discharge requirements. All earthmoving activities from Project construction, including site grading and excavation, would expose soil and may cause erosion, especially during rain events. LAUSD requires all construction projects to comply with regulatory requirements if projects disturb greater than 1 acre.

Accordingly, the Project would be required to develop and maintain a SWPPP with BMPs to comply with the Construction General permit and as required by the Regional Water Quality Control Board's NPDES permit, including SC-HWQ-1 (Stormwater Technical Manual) and SC-HWQ-2 (Compliance Checklist for Stormwater Requirements at Construction Sites). LAUSD developed a program wide SWPPP in 2005 (updated in 2007 and 2009). This plan would prevent or minimize stormwater runoff pollution, contamination, or nuisance from school construction projects as defined in California Water Code Section 13050.

The Project site would be designed to meet the requirements of the SUSMP and Low Impact Development (LID) for Los Angeles County. LID Ordinance requires that all Designated, Non-Designated, street and road construction, and single-family hillside home projects comply with Los Angeles County Code Title 12, Chapter 84. LID is a stormwater quality management strategy that seeks to mitigate the increase in pollution and stormwater volume that enters into storm drains due to the development of urban hardscapes. Short-term impacts to water quality due to construction activities would be regulated under California State Water Resources Control Board Water Quality Order No. 99-08-DWQ (General Construction Permit). Under this permit, LAUSD would implement a SWPPP and BMPs would be implemented to ensure that impacts to water quality that would occur during construction are less than significant. No mitigation measures or further analysis of this issue are required.

b) No Impact. A groundwater well (Well Number 4758B) is located within the Miller Career and Transition Center, north of Cantara Street.[51] Project construction and operations would occur more than 500 feet south of this groundwater well. Water needed for the Project would be associated with dust suppression during grading and would be obtained from available public or private sources (e.g., water trucks). As such, no impacts to the local aquifer would occur. No further analysis of this issue is required.

c) Less than Significant Impact. The existing drainage systems and patterns would not be altered due to the urbanized environment. Project design would incorporate CHPS standards to the extent feasible to avoid water quality impacts and velocity increases where possible. The existing drainage condition of the campus shall be replaced within the limits of the modernization program. This would require the design and installation of a new underground storm drain system to mitigate the peak flow within the new areas of construction. Storm drainage system and design, as well as water mitigation, shall meet LAUSD, county, and state requirements. Soil disturbance from earthmoving activities associated with Project construction could potentially lead to wind or water erosion; however, these impacts would likely be minor and less than significant once Project construction is complete. There are no streams or rivers adjacent to the Project, and standard BMPs would be required to address erosion or siltation to offsite areas. No mitigation measures or further study are required.

d) Less than Significant Impact. The proposed Project would not alter the existing drainage pattern onsite, nor would it substantially increase the rate or amount of surface runoff that would result in flooding on- or off-site. There are no streams or rivers near the Project. The Aliso Creek flood control channel is located more than 300 feet from the nearest portion of the Project area. Although there would be a slight increase in runoff from the additional impervious surfaces, it is not anticipated to result in offsite flooding. PDFs, such as bioretention cells, may be included into Project design to infiltrate and temporarily store runoff water, thereby reducing the overall runoff volume. No mitigation measures or further study are required.

e) Less than Significant Impact. Additional runoff from Project construction and operation are not expected to exceed the capacity of existing storm drains or provide substantial additional sources of polluted runoff. The Project includes design and installation of a new storm drain system to mitigate the peak flow within the new areas of construction. The system will be designed to accommodate the modernization improvements and convey the storm drain lines from the assembly lawn area. The storm drain system will meet current LAUSD specification section 33 40 00 "Storm Drainage Utilities" and the LAUSD School Design Guide Requirements. Potential impacts from stormwater runoff would not exceed drainage capacity due to the Project's design features and its conformance with NPDES permit

[51] County of Los Angeles Department of Public Works Groundwater Data, 2016. Accessed November 2016 - http://dpw.lacounty.gov/general/wells/#.

requirements and regulations. LAUSD would comply with California Code 53097 during Project implementation to ensure the Project would not adversely affect local drainage systems. No mitigation measures or further study are required.

All LAUSD construction projects are required to comply with regulatory requirements if land disturbance is greater than 1 acre. The proposed Project would be required to prepare and implement a sediment and erosion control plan that follows the BMPs outlined by the State Water Resources Control Board to comply with a Construction General permit, including development of an SWPPP, as required by the Regional Water Quality Control Board's NPDES permit. Incorporation of LAUSD Standard Conditions of Approval SC-HWQ-1 (Stormwater Technical Manual) and SC-HWQ-2 (Compliance Checklist for Stormwater Requirements at Construction Sites) would ensure compliance with applicable environmental regulations. Based on these findings, potential impacts to existing or planned stormwater drainage systems would be less than significant. No mitigation measures or further study are required.

f) Less than Significant Impact. The proposed Project would not substantially degrade water quality. Construction-related pollutants and non-point source or "stormwater" pollution from onsite vehicles may enter the drainage system during rain events. As discussed in Section IX.(e), LAUSD and Project construction contractors would implement construction BMPs and comply with NPDES regulations, including preparation of an SWPPP. With incorporation of SC-HWQ-1 and SC-HWQ-2, the potential to substantially degrade water quality would be less than significant. No mitigation measures or further study are required.

g) No Impact. The proposed Project does not include the construction of residential land uses. The 100-year flood hazard area runs along the Aliso Creek flood control channel, and no construction is planned in its immediate vicinity. No further analysis of this issue is required.

h) No Impact. The 100-year flood hazard area runs along the Aliso Creek flood control channel. The proposed Project and associated improvements would be constructed within the campus property. As such, it would not impede or redirect flood flows. No further analysis of this issue is required.

i) No Impact. There are no levees or dams near the Project. The proposed Project involves demolition of existing buildings; construction, modernization, and seismic retrofit of school facilities; and sitewide infrastructure upgrades with no increase in planned student enrollment or capacity. These improvements would not 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. No further analysis of this issue is required.

j) No Impact. The proposed Project is located more than 12 miles from the Pacific Ocean and, as such, the potential for tsunami is negligible. In addition, the proposed Project is not located near a large body of water (e.g., dam, lake) subject to a seiche or near hillside slopes that could be subject to a mudflow. No further analysis of this issue is required.

4.10. Land Use/Planning

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

a) No Impact. The proposed Project involves new construction and improvements to existing campus buildings and associated improvements to the campus site. Project improvements would be located within the existing school campus and would not physically divide the established communities surrounding the school; therefore, no impact would occur. No mitigation measures or further analysis are required.

b) No Impact. The Project site is zoned PF-1XL (Public Facilities) and has a corresponding General Plan land use designation of Public Facilities.[52] The Project site is located in a 1XL Height District, meaning that a building or structure constructed onsite must not exceed 30 feet or two stories in height. The Project would not conflict with any applicable City of Los Angeles land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect, as Project implementation would conform with the existing land use designation. The California legislature granted school districts the power to exempt school property from local zoning requirements, provided the school district complies with the terms of Government Code Section 53094.[53] As lead agency for the proposed Project, it is anticipated that LAUSD would comply with Government Code Section 53094 to render the local City of Los Angeles Zoning Ordinance inapplicable to the proposed Project. Following a two-thirds vote of the LAUSD Board, LAUSD can exempt a school site from such local zoning requirements. Within 10 days of the action, the Board must provide the City of Los Angeles with notice of this action.

Additionally, the proposed Project improvements for pedestrian and vehicular traffic circulation would be consistent with the goals of the SCAG 2016-2040 RTP/SCS, by maximizing mobility and accessibility; ensuring travel safety and reliability; and encouraging and facilitating active transportation (bicycling and walking); therefore, no impact would occur. No mitigation measures or further analysis are required.

c) No Impact. There are no HCPs or NCCPs in the vicinity of the Project. The Project location is not within the County of Los Angeles SEA.[54] Accordingly, the Project would not conflict with any applicable HCPs or NCCPs. No mitigation measures or further analysis are required.

4.11. Mineral Resources

ENVIRONMENTAL ISSUE	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
XI. MINERAL RESOURCES: Would the project:				
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	☒
b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?	☐	☐	☐	☒

a) No Impact. According to the Program EIR, the Project site is located within the San Fernando Valley Production-Consumption (P-C) Region according to the presence or absence of significant sand and gravel

52 City of Los Angeles, 2016. NavigateLA Website Accessed November 2016 - http://navigatela.lacity.org/navigatela/.

53 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 PRC, 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 non-classroom 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).

54 County of Los Angeles Department of Regional Planning, 2016. Significant Ecological Area (SEA) Program Website. Accessed November 2016 - http://planning.lacounty.gov/sea.

deposits. Based on the California Department of Conservation website, the Project site is located within the Mineral Resource Zone (MRZ) MRZ-1, which is an area where adequate information indicates that no significant mineral deposits are present, or where it is judged that little likelihood exists for their presence.[55] The Project site is not located within an area designated as a mineral resource producing zone, and there are no mining sites located on LAUSD campuses. The ARCO Oil & Gas Company has a plugged and abandoned oil and gas production well located less than 0.5 mile north of the Project site (on Chase Street, west of Tampa Avenue). The proposed Project involves new construction and improvements to existing campus buildings and associated improvements to the campus site. The work would not result in the loss of availability of a known mineral resource that would be of value to the region or the residents of the state; therefore, no impact would result. No further analysis of this issue is required.

b) No Impact. As noted above, the Project site is not located within a mineral producing zone, and no mining sites are located within LAUSD campuses. The ARCO Oil & Gas Company has a plugged and abandoned oil and gas production well located less than 0.5 mile northwest of the Project site (on Chase Street, west of Tampa Avenue). The proposed Project involves new construction and improvements to existing campus buildings and associated improvements to the campus site. The work would not result in the loss of availability of a locally important mineral resource recovery site as delineated on a local general plan, specific plan, or other land use plan; therefore, no impact would result. No further analysis of this issue is required.

4.12. Noise

The following analysis of potential noise impacts is based on the findings from the *Noise Study Technical Report* prepared for LAUSD by Parsons (Appendix F).

ENVIRONMENTAL ISSUE	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
XII. NOISE: Would the project result in:				
a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☐	☒	☐
b) Exposure of persons 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 2 miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒
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?	☐	☐	☐	☒

The Program EIR includes Standard Conditions for minimizing noise impacts in areas where projects would be implemented under the SUP. Applicable Standard Conditions related to noise impacts for the proposed Project are listed below.

SC-N-5: LAUSD Facilities Division or its construction contractor shall consult and coordinate with the school principal or site administrator, and other nearby noise-sensitive land uses prior to construction to schedule high noise or vibration-producing activities to minimize disruption. Coordination between the school, nearby land uses, and the construction

[55] State of California Department of Conservation, 2016. Division of Oil, Gas & Geothermal Resources Well Finder Accessed November 2016 - http://maps.conservation.ca.gov/doggr/index.html#.

contractor shall continue on an as-needed basis throughout the construction phase of the project to reduce school and other noise-sensitive land use disruptions.

SC-N-6: LAUSD shall require the construction contractor to minimize blasting for all construction or demolition activities, where feasible. If demolition is necessary adjacent to residential uses or fragile structures, LAUSD shall require the construction contractor to avoid using impact tools. Alternatives that shall be considered include mechanical methods using hydraulic crushers or deconstruction techniques.

SC-N-7: For projects where pile-driving activities are required within 150 feet of a structure, a detailed vibration assessment shall be provided by an acoustical engineer to analyze potential impacts related to vibration to nearby structures and to determine feasible mitigation measures to eliminate potential risk of architectural damage.

SC-N-8: LAUSD shall meet with the construction contractor to discuss alternative methods of demolition and construction for activities within 25 feet of a historic building to reduce vibration impacts. During the preconstruction meeting, the construction contractor shall identify demolition methods not involving vibration-intensive construction equipment or activities. For example, sawing into sections that can be loaded onto trucks results in lower vibration levels than demolition by hydraulic hammers.

- Prior to construction activities, the construction contractor shall inspect and report on the current foundation and structural condition of the historic building.
- The construction contractor shall implement alternative methods identified in the preconstruction meeting during demolition, excavation, and construction for work done within 25 feet of the historic building.
- The construction contractor shall avoid use of vibratory rollers and packers adjacent to a historic building.
- During demolition, the construction contractor shall not phase any ground-impacting operations near a historic building to occur at the same time as any ground-impacting operation associated with demolition and construction of a new building. During demolition and construction, if any vibration levels cause cosmetic or structural damage to a historic building, the District shall issue "stop-work" orders to the construction contractor immediately to prevent further damage. Work shall not restart until the building is stabilized and/or preventive measures to relieve further damage to the building are implemented.

SC-N-9: LAUSD shall prepare a noise assessment. 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 [noise levels] below [the limits set by] 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:

Source Controls

- 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 [has] quality mufflers installed
- Lubrication & Maintenance – well maintained equipment is quieter

- Reduced Power Operation – use only necessary size and power
- Limit Equipment On-Site – only have necessary equipment on-site
- Noise Compliance Monitoring – technician on site to ensure compliance
- Quieter Backup Alarms – manually-adjustable or ambient sensitive types

Path Controls

- 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

Receptor Controls

- 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.

In analyzing noise and vibration impacts associated with the proposed Project, the following standards were considered:

California State Building Code

California Government Code Section 65302 (f) mandates that the legislative body of each county and city adopt a noise element as part of their comprehensive general plan. The local noise element must recognize the land use compatibility guidelines established by the State Department of Health Services, as shown in Table 5. The City of Los Angeles has adopted these standards.

Table 5 – Land Use Compatibility for Community Noise Environments

Land Use Category	Community Noise Exposure Level (in terms of CNEL)			
	Normally Acceptable	Conditionally Acceptable	Normally Unacceptable	Clearly Unacceptable
Residential – Low-Density, Single-Family, Duplex, Mobile Homes	50 – 60	55 – 70	70 – 75	75 – 85
Residential – Multiple Family	50 – 65	60 – 70	70 – 75	70 – 85
Transient Lodging – Motel, Hotels	50 – 65	60 – 70	70 – 80	80 – 85
Schools, Libraries, Churches, Hospitals, Nursing Homes	50 – 70	60 – 70	70 – 80	80 – 85
Auditoriums, Concert Halls, Amphitheaters	NA	50 – 70	NA	65 – 85
Sports Arenas, Outdoor Spectator Sports	NA	50 – 75	NA	70 – 85
Playgrounds, Neighborhood Parks	50 – 70	NA	67.5 – 75	72.5 – 85
Golf Courses, Riding Stables, Water Recreation, Cemeteries	50 – 70	NA	70 – 80	80 – 85
Office Buildings, Business Commercial and Professional	50 – 70	67.5 – 77.5	75 – 85	NA
Industrial, Manufacturing, Utilities, Agriculture	50 – 75	70 – 80	75 – 85	NA
Source: General Plan Guidelines, Office of Planning and Research, California, October 2003, page 250.				

Table 5 – Land Use Compatibility for Community Noise Environments

Land Use Category	Community Noise Exposure Level (in terms of CNEL)			
	Normally Acceptable	Conditionally Acceptable	Normally Unacceptable	Clearly Unacceptable
Notes: NORMALLY ACCEPTABLE Specified land use is satisfactory, based on the assumption that any buildings involved are of normal conventional construction, without any special noise insulation requirements. CONDITIONALLY ACCEPTABLE New construction or development should be undertaken only after a detailed analysis of the noise reduction requirements is made and needed noise insulation features included in the design. Conventional construction, but with closed windows and fresh air supply systems or air conditioning, will normally suffice. NORMALLY UNACCEPTABLE New construction or development should be discouraged. If new construction or development does proceed, a detailed analysis of the noise reduction requirements must be made and needed noise insulation features included in the design. CLEARLY UNACCEPTABLE New construction or development should generally not be undertaken. NA: Not Applicable				

The guidelines rank noise-land use compatibility in terms of "normally acceptable," "conditionally acceptable," and "clearly unacceptable" noise levels for various land use types. Single-family homes are "normally acceptable" in exterior noise environments up to 60 community noise level equivalent (CNEL) and "conditionally acceptable" up to 70 CNEL. Multiple-family residential uses are "normally acceptable" in exterior noise environments up to 65 CNEL and "conditionally acceptable" up to 70 CNEL. Schools, libraries, and churches are "normally acceptable" in exterior noise environments up to 70 CNEL, as are office buildings and business, commercial, and professional uses.

Vibration Standards

Vibration is sound radiated through the ground. Ground-borne noise is the rumbling sound caused by the vibration of building interior surfaces. The ground motion caused by vibration is measured as peak particle velocity (PPV) in inches per second and is referenced as vibration decibels (VdB). Typical outdoor sources of perceptible ground-borne vibration are construction equipment and traffic on rough roads.

The American National Standards Institute (ANSI, 1983) indicates that vibration levels in critical care areas, such as hospital surgical rooms and laboratories, should not exceed 0.2 inch per second of PPV. The Federal Transit Administration (FTA) also uses a PPV of 0.2 inch per second as a vibration damage threshold for fragile buildings and a PPV of 0.12 inch per second for extremely fragile historic buildings.[56] The FTA criteria for infrequent ground-borne vibration events (less than 30 events per day) that may cause annoyance are 80 VdB for residences and buildings where people normally sleep and 83 VdB for institutional land uses with primarily daytime use.

LAUSD does not have vibration-specific standards for vibration impacts for classrooms; however, FTA has published standard vibration levels for construction equipment operations, at a distance of 25 feet. Table 6 presents the data from FTA sources that establish maximum allowable PPV values before structural damage is likely to occur.

Table 6 – FTA Construction Vibration Damage Criteria

Building Category	PPV (in/sec)
I. Reinforced-concrete, steel or timber (no plaster)	0.5
II. Engineered concrete and masonry (no plaster)	0.3
III. Non-engineered timber and masonry buildings	0.2
IV. Buildings extremely susceptible to vibration damage	0.12

Source: FTA, 2006.

[56] FTA Transit Noise and Vibration Impact Assessment. May 2006.

Thresholds of Significance

LAUSD School Upgrade Program EIR

LAUSD has developed a set of policy statements and thresholds related to impacts for onsite school operations. These thresholds are designed to maintain a safe, comfortable educational environment for children attending LAUSD schools. Noise thresholds for LAUSD classrooms are:

- Maximum exterior noise level 70 dBA L_{10} or 67 dBA L_{eq};
- Maximum interior classroom noise levels 55 dBA L_{10} or 45 dBA L_{eq};
- Maximum permanent increase of noise levels at nearby noise sensitive land uses of 3 dBA CNEL or higher;
- Classroom acoustical performance shall be 45 dBA L_{eq} background noise level (unoccupied) or better with maximum (unoccupied) 0.6 second reverberation time.

For construction noise, the significance thresholds apply if activity occurs within 500 feet of a residential use or between the hours identified in the Noise Ordinance. The proposed Project would have construction activities occurring within 500 feet of residential land uses; therefore, the City of Los Angeles significance thresholds would be applicable. A project would normally have a significant impact on noise levels from construction if:

- Construction activities lasting more than 1 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 3-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 p.m. and 7:00 a.m. Monday through Friday, before 8:00 a.m. or after 6:00 p.m. on Saturday, or at any time on Sunday.

a) Less than Significant Impact. Schools can generate noise from sports events, athletic fields, playgrounds, and parking lot activity, and some of these features could increase noise at nearby receptors as schools are typically located in residential areas. Existing land uses in the proposed Project area include single-family homes and some commercial uses, an electrical transmission corridor, a landscape nursery, Aliso Canyon Wash, and a commercial strip mall. A site visit to the school identified that the dominant noise source within the Project area is vehicles traveling on the local roadways bounding the high school. The school is bounded by Vanalden Avenue to the west, Roscoe Boulevard to the north, and Strathern Street to the south.

Residential and some commercial land uses surround the school. The closest sensitive receptors are residences located approximately 200 feet from anticipated construction activity; on the opposite side of Aliso Canyon Wash; the first row of residences is located approximately 200 feet from the anticipated construction activity and residences on Vanalden Avenue. Residential land uses located on the opposite side of Strathern Street are located more than 500 feet away and residences on Roscoe Boulevard are more than 400 feet away.

Noise measurements were not taken to identify existing noise levels within the proposed Project area; however, presumed ambient noise levels are provided in the City of Los Angeles Municipal Code Section 111.03 – Minimum Ambient Noise Level, shown in Table 7.

Table 7 – Presumed Ambient Noise Levels (dBA)

Type	Zone	Presumed Ambient Noise Level, dBA	
		Day	Night
Residential	A1, A2, RA, RE, RS, RD, RW1, RW2, R1, R2, R3, R4, R5	50	40
Commercial	P, PB, CR, C1, C1.5, C2, C4, C5, CM60	60	55
Manufacturing	M1, MR1, MR2	60	55
Heavy Manufacturing	M2, M3	65	65

Source: Los Angeles Municipal Code, effective March 29, 1982.

The proposed Project would involve demolition of nine permanent and 28 portable buildings, relocated hardscape and storage units, and relocation of one portable building. The demolished school buildings would be replaced by seven new buildings. Demolition and construction of the buildings would generate short-term noise impacts. Short-term noise levels associated with Project construction would be higher than existing ambient noise levels, but would cease upon Project completion. Noise impacts associated with construction activity are a function of the noise generated by construction equipment, location, sensitivity of nearby land uses, and timing and duration of the noise-generating activities. Normally, these activities are carried out in stages, and each stage has its own characteristics based on the mix of equipment in use. Table 8 shows phases of construction, equipment, and noise emission levels. An estimate of equivalent continuous level (L_{eq}) can be calculated at various relevant distances for each stage of construction utilizing typical sound emission levels and the estimated usage factor. These estimated construction noise levels are also shown in Table 8.

Construction activities are anticipated to take up to 36 months; therefore, construction-related noise increases greater than 5 dBA CNEL or more over ambient levels at the residential dwellings adjacent to the Project site would be significant. The proposed Project area consists of a mixture of residential and commercial land uses. The presumed noise levels for residential land uses are 50 dBA and 60 dBA, respectively. These presumed noise levels are a conservative estimate provided by the City; actual existing noise levels may be louder than 50 dBA in the proposed Project area because this area is a mixture of residential and commercial land uses. The nearest residence to the construction activity (construction and modernization of the school buildings) is located approximately 200 feet away. The estimated total noise level for construction and modernization at 200 feet is 76 dBA L_{eq}. The construction equipment would be operated intermittently and only during normal business hours; however, in comparing the estimated construction noise levels to the presumed residential noise levels, construction of the proposed Project could cause a significant impact to the nearby residences. However, with incorporation of LAUSD standard conditions SC-N-5, SC-N-6, and SC-N-9, construction impacts would be less than significant. No mitigation measures or further study are required.

Normal school operations and classroom schedules would continue throughout construction of the proposed Project. Some of the noise-generating construction activities would, for several days at a time, be near enough to classroom buildings to create a potential for noise disturbance. Per LAUSD standards, the interior threshold for classroom noise levels is 45 dBA L_{eq} or below. Exterior walls, with closed single-pane windows, typically provide an average 20-dB reduction from exterior noise levels, without extra measures. The nosiest construction activity (i.e., building construction) would potentially generate noise levels as high as 88 dBA L_{eq} at 50 feet in distance, which could potentially cause interior noise levels of 68 dbA L_{eq} inside nearby classrooms. These potential noise levels would exceed the LAUSD interior classroom noise threshold; however, this noise level is assuming the 30 percent continuous operation of all construction equipment in a single hour. With utilization of the following SCs, construction impacts would be less than significant to interior classroom noise.

Table 8 – Predicted Construction Equipment Noise Levels

Phases 1 and 2	Schedule	Equipment	Max Sound Level at 50 Feet[1]	Usage Factor[2]	Sound Level at 50 Feet	Sound Level at 100 Feet	Sound Level at 200 Feet
Demolition/ Interim Housing/ Modernization (i.e., Building Interiors)	2 months	Excavators	85	0.3	80	74	68
		Loader	85	0.5	82	76	70
		Bobcat/Skip	80	0.3	75	69	63
		Jack Hammers/Air Compressor	81	0.5	78	72	66
		Overall L_{eq}:			85	79	73
Site Prep/ Modernization	2 months	Excavator	85	0.3	80	74	68
		Compactor	82	0.3	77	71	65
		Loader	85	0.5	82	76	70
		Skip Loader	80	0.2	73	67	61
		Vibratory Rollers (for 95% soil compaction)	74	0.2	67	61	55
		Trencher / Excavator	85	0.3	80	74	68
		Overall L_{eq}:			86	80	74
Building Construction/ Modernization	12 months	Concrete Trucks	85	0.3	80	74	68
		Crane-Mounted Auger Drill, or Crane-Suspended Downhole Vibrator	83	0.3	78	72	66
		Concrete Pump	82	0.3	77	71	65
		Crane	83	0.3	78	72	66
		Dump Trucks	88	0.5	85	79	73
		Backhoes	80	0.3	75	69	63
		Air Compressor	81	0.5	78	72	66
		Overall L_{eq}:			88	82	76
Asphalt Paving and Offsite Street Work	2 months	Skip Loaders	80	0.2	73	67	61
		Roller	74	0.3	69	63	57
		Paver	89	0.3	84	78	72
		Asphalt Trucks	88	0.3	83	77	71
		Overall L_{eq}:			87	81	75

Notes:
[1] Max sound levels from the FHWA Construction Noise Handbook (August 2006) were utilized.
[2] Usage factor is a percentage of time a piece of equipment is used within an 8-hour time period. It was assumed that no piece of equipment would be utilized for more than 50 percent of the time.

b) Less than Significant Impact. The proposed Project would involve demolition of nine permanent and 28 portable buildings, relocated hardscape and storage units, and relocation of one portable building. These activities would create groundborne vibration and noise. Construction or demolition activity can result in varying degrees of ground vibration, depending on the equipment and methods employed. Operation of construction equipment causes ground vibrations that spread through the ground and diminish in strength with distance. Ground vibrations from construction activities very rarely reach the levels that can damage structures, but they can achieve the audible range and be felt in buildings close to the Project site. As previously discussed, the nearest sensitive receptors to the Project site are 200 feet away from the construction activity. The calculated vibration levels expressed in VdB and PPV for typical construction equipment at distances of 25, 50, and 100 feet are listed in Table 9.

Table 9 – Vibration Source Levels for Construction Equipment

Equipment	PPV at 25 feet (in/sec)	PPV at 50 feet (in/sec)	PPV at 100 feet (in/sec)
Dyna Hoe with hydraulic ram (Hoe Ram)	0.089	0.031	0.011
Dump Truck (Loaded)	0.076	0.027	0.010
Pile Driver, Impact (Upper Range)	1.518	0.537	0.190
Pile Driver, Impact (Typical)	0.644	0.228	0.081
Pile Driver, Sonic (Upper Range)	0.734	0.260	0.092
Pile Driver, Sonic (Typical)	0.170	0.060	0.021
Vibratory Roller	0.210	0.074	0.026
Large Bulldozer	0.089	0.031	0.011
Crane-Mounted Auger Drill	0.089	0.031	0.011
Jackhammer	0.035	0.012	0.004
Whacker Compactor	0.004	0.001	0.0005
Small Bulldozer	0.003	0.001	0.0003

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

The construction equipment would be expected to generate intense noise that is disturbing and can result in ground vibrations. The vibrations at the nearest sensitive receptor could exceed the thresholds cited in Table 9 above; however, demolition activities would be temporary and cease upon completion. Additionally, construction would only occur during daytime hours as permitted in Section 41.40 of the City's Municipal Code, which would minimize sleep disruption and other disruptive effects at nearby sensitive uses.

In addition, several buildings on the school grounds were found to be contributors to a historic district. Potential vibration impacts could possibly impact these historic buildings; however, as stated previously, these activities would be short term and temporary. Construction vibration impacts would be less than significant with application of SC-N-5, SC-N-6, SC-N-7, and SC-N-8 for minimizing vibration impacts.

c) No Impact. Operation of the proposed Project is not expected to increase the planned enrollment or capacity at the school or generate growth. No new trips would be generated from this proposed improvement Project. As traffic volumes are not anticipated to increase, traffic noise levels within the proposed Project area would remain the same and within the "Normally Acceptable" range in the land use compatibility guidelines; therefore, operation noise impacts would not cause a significant impact to land uses within the proposed Project area. No further analysis of this issue is required.

d) Less than Significant Impact. The Project would result in a temporary increase in ambient noise near the Project site from the use of stationary and mobile construction equipment during the construction

period. Construction impacts are discussed in Response to Checklist Question XI.a above. No mitigation measures or further study are required.

e) No Impact. The proposed site is not located within an area subject to an airport land use plan, within 2 miles of a public airport or public use airport. The closest airport is Van Nuys Airport, which is located approximately 3 miles from the Project site. No further analysis of this issue is required.

f) No Impact. The proposed site is not located near a private airstrip. The closest airport is Van Nuys Airport, which is located approximately 3 miles from the Project site. No further analysis of this issue is required.

4.13. Pedestrian Safety

ENVIRONMENTAL ISSUE	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
XIII. PEDESTRIAN SAFETY: Would the project:				
a) Substantially increase vehicular and/or pedestrian safety hazards due to a design feature or incompatible uses?	☐	☐	☒	☐
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 hazards?	☐	☐	☒	☐

The following analysis is based on the findings of the Traffic Study Technical Memorandum (June 2017) prepared for this Project (see Appendix G). The Program EIR includes Standard Conditions for minimizing impacts to pedestrian safety in areas where projects would be implemented under the SUP. Applicable Standard Conditions related to pedestrian safety impacts for the proposed Project are listed below.

SC-PED-4: **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. The Guide sets forth requirements for traffic and pedestrian safety, and procedures for school principals to request assistance from OEHS, the Los Angeles School Police Department (LASPD), or the local police department regarding traffic and pedestrian safety. Distribution and posting of the Back to School Safety Tips flyer is required. This guide also includes procedures for traffic surveys, parking restrictions, crosswalks, advance warning signs (school zone), school parking signage, traffic controls, crossing guards, or for determinations on whether vehicle enforcement is required to ensure the safety of students and staff.

SC-PED-5: **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.

a) Less than Significant Impact. The school campus is located in a densely developed urban area characterized by residential and commercial land uses. The school has passenger vehicle traffic (personal vehicles), non-motorized traffic (pedestrians and bicyclists), and limited truck traffic for school deliveries on the surrounding roadways. The existing, onsite service road divides the campus and creates the potential for vehicle and pedestrian conflicts. At peak periods, safety conflicts occur between students traversing to corner crosswalks, parent pick-up and drop-off along Vanalden Avenue, parking lots located along Vanalden Avenue, and access to Cantara Street. The primary pedestrian access into the campus is located at the north edge along Vanalden Avenue, where there are multiple egress gates in addition to entry at the

Administration Building. Access is also provided on the north side of the campus along Cantara Street. Cantara Street provides student access to a covered walkway from a vehicular drop-off/pick-up zone. A secondary pedestrian access point is also provided at the southern edge of Strathern Avenue. Many students arriving or departing on foot utilize the crosswalks at Vanalden Avenue and Roscoe Boulevard.

Construction and demolition activities would result in a temporary increase in truck and equipment activity on the roadway network, but the trucks would not exceed the size and weight limits for public roadways and would be discouraged from travel during peak traffic hours to the extent feasible. To avoid conflicts between construction activities and students, a multi-phased plan has been developed to ensure student safety. Temporary student classrooms would be placed as far away as possible from the construction zones and construction staging areas and equipment areas would be fenced to limit access. Compliance with SC-T-4, which requires a construction worksite traffic control plan to be prepared and implemented per the Los Angeles Department of Transportation (LADOT) and California Department of Transportation (Caltrans) standards, and implementation of on-campus safety BMPs would reduce vehicle, pedestrian, and bicycle impacts during construction.

LAUSD's construction BMPs, identified in the construction worksite traffic control plan, would include the location of haul routes, hours of operation, protective devices, warning signs, and access to abutting properties. Additionally, construction zones on the campus would include fencing to separate construction zones from students and ensure safety. Safety personnel would be onsite during all construction activities to monitor areas around the construction zone. Additionally, the construction contractor would work closely with the school administration during construction to coordinate activities and ensure students are safe. Impacts associated with construction would be less than significant. No mitigation measures or further study are warranted.

The proposed on-campus pedestrian circulation plan does not conflict with the proposed campus service road and limited-access on-campus roadway. The Project would improve vehicular and pedestrian access to the site by reconfiguring internal parking and campus circulation. The new service road would be relocated east of the new buildings and along the eastern property boundaries. Limited vehicular access would run along the existing access road near the track and baseball fields (toward Wilbur Avenue), the gymnasium (toward Strathern Street), and near Buildings 3 and 20. The new pedestrian spine will be located in the northeast part of the campus, shown in Figure 4. It extends from existing Building 18 on the south past to Cantara Street on the north. The proposed performing arts center, the new two-story classroom building, and existing Buildings 9 and 10 are to the west. The proposed three-story classroom building and food service/multi-purpose building are to the east. The area is approximately 650 feet in length and 40 feet wide. This corridor also provides emergency vehicle and service access.

The pedestrian spine provides a strong north-south pedestrian link to the campus. The courtyards between the existing buildings are tied to the new area with connecting walks to the north-south pedestrian spine. The south part of the pedestrian spine will engage and link to the Performing Arts Center Plaza. The Project includes the use of standard engineering practices, such as driveway widths and turning radii and the provision of line of sight to avoid design elements that could result in hazards. LAUSD utilizes the School Traffic Safety Reference Guide REF-4492.1, which includes guidance on passenger loading zones and procedures for parking and pedestrian safety. Implementation of OEHS CEQA Specification Manual, See Appendix G, includes ensuring that bus and car loading areas do not overlap, thereby reducing the potential for conflicts between cars and buses arriving and departing. In addition, projects are required to provide emergency vehicle access for the City of Los Angeles Fire Department (LAFD). Conformance to District policies and local ordinances would ensure that adequate access would be maintained.

b) No Impact. The proposed Project would occur on an existing school campus, and the Project would be implemented in accordance with LAUSD Standards, as described above in Response to Checklist Question XIII.a). Project operation would not generate additional trips beyond what have been planned. The campus would continue to house the existing school programs and continue to serve the same current and future student capacity after Project implementation. The same routes would be used by students to access the

existing school site. During construction, pedestrian routes in the surrounding neighborhood, including streets and sidewalks, would not be affected. As such, the Project would not create an unsafe route to school, and there would be no impacts to students walking from local neighborhoods. No mitigation measures or further evaluation are required. .

c) Less than Significant Impact. The construction area is on the Cleveland HS campus. There are no freeways adjacent to or near the school. The closest freeway is the Ventura Freeway, located approximately 3 miles south of the Project site. The school campus is adjacent to Roscoe Boulevard, which is classified as Boulevard II by the City of Los Angeles. However, the Project would not change existing operations at the school. The school would continue to house the existing school programs and continue to serve the same current and future student capacity after Project completion. Student routes to school would not be changed by the proposed Project. The proposed Project would not introduce any new hazards related to major arterial roadways or freeways, and impacts would be less than significant.

The proposed Project would occur on an existing school campus, and the Project would be implemented in accordance with LAUSD Standards, as described in Response to Checklist Question XIII.a. Students already walk and bike to Cleveland HS and safety devices, such as crosswalks, traffic lights, and signage are already in place. In both the morning drop-off and afternoon pick-up, periods of vehicle queues were observed along Vanalden Avenue adjacent to Cleveland HS. When no street parking was available, drivers were noted to momentarily double-park and allow students to enter or exit the vehicle. Depending on the amount of time used in this process, a queue would often form behind the obstructing vehicle and the students exiting or entering those vehicles. The maximum observed queue was approximately 15 to 20 vehicles in both directions along Vanalden Avenue.

In addition to blocking traffic, double parking was observed to create a rushed atmosphere in which students hurried to and from the vehicles. In several instances, students were observed crossing the roadway at unexpected locations, entering traffic from within the vehicle queues and creating an unsafe condition. Existing pedestrian and vehicle interactions are also prominent at the intersection of Vanalden Avenue and Cantara Street during the drop-off and pick-up periods. Implementation of the Project would not impose a new safety hazard as compared to current conditions. To ensure adequate safety standards are met, the Project would implement SC-PED-4 and SC-PED-5 and compliance measures as necessary. In addition, the following recommendations are provided for consideration as Project design features:

- Additional crosswalk markings and signage are recommended at Cantara Street.
- Additional school zone striping and signage should be installed along Vanalden Avenue and Strathern Street.
- As part of the Project design features, appropriate sight distance provisions should be made at the parking lot access driveways.
- Pedestrian crossing control should be installed at the Cantara Street and Vanalden Avenue intersection.
- Uncontrolled crossings should be identified clearly with well-painted pavement markings, warning signs, or other enhanced treatments such as Rectangular Rapid Flash Beacons or raised crosswalks that alert drivers to the crossing location.

The proposed Project would not introduce any new hazards related to major arterial roadways or freeways, and impacts would be less than significant. No mitigation measures or further evaluation are required.

4.14. Population/Housing

ENVIRONMENTAL ISSUE	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
XIII. 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?	☐	☐	☐	☒

a) No Impact. The Project area is built-out and is comprised of the campus and a primarily residential neighborhood with some commercial uses. The proposed Project involves new building construction and improvements to existing campus buildings and associated improvements to the campus site. This Project would serve enrolled students at the campus and would not affect existing infrastructure use or demand for public services. Project construction would temporarily increase employment in the area, but would not change the current employment characteristics in the area over the long term. The proposed Project would not result in either directly or indirectly inducing population growth, and no impacts would result. No further analysis of this issue is required.

b) No Impact. No residential displacements are anticipated because the proposed Project would occur within the campus property. There is no property acquisition involved with Project construction or operation. The proposed Project would not displace substantial numbers of existing housing, and no impacts would result. No further analysis of this issue is required.

c) No Impact. The proposed Project would construct new buildings and modernize existing school facilities. Construction and operation of the proposed Project would not displace substantial numbers of people, and no impacts would result. No further analysis of this issue is required.

4.15. Public Services

ENVIRONMENTAL ISSUE	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
XIV. PUBLIC SERVICES:				
a) 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, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
Fire protection?	☐	☐	☒	☐
Police protection?	☐	☐	☒	☐
Schools?	☐	☐	☒	☐
Parks?	☐	☐	☐	☒
Other public facilities?	☐	☐	☐	☒

The Program EIR includes Standard Conditions for minimizing impacts to public services in areas where projects would be implemented under the SUP. Applicable Standard Conditions related to public service impacts for the proposed Project are listed below.

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

SC-T-4 LAUSD shall require its contractors to submit a construction worksite traffic control plan to the local City or County jurisdiction for review prior to construction. The plan shall show the location of any haul routes, hours of operation, protective devices, warning signs, and access to abutting properties. LAUSD shall encourage its contractor to limit construction-related trucks to off-peak commute periods. As required by the California Department of Transportation (Caltrans), applicable transportation-related safety measures shall be implemented during construction.

SC-HWQ-2 **Compliance Checklist for Stormwater 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 an SWPPP; BMPs for minimizing stormwater pollution to be specified in an SWPPP; and monitoring stormwater discharges to ensure that sedimentation of downstream waters remains within regulatory limits.

a) Fire Protection. Less than Significant Impact. Fire protection and emergency medical services for the Project site location are provided by LAFD. Neighborhood LAFD Fire Station 73 serves Cleveland HS and is located at 7419 Reseda Boulevard. Other LAFD fire stations that serve the Project site include Station 103 at 18143 Parthenia Street, Northridge (2 miles northeast of the Project site), and Station 104 at 8349 Winnetka Avenue, Winnetka (1.5 miles northwest of the campus).

The proposed Project involves new construction and improvements to existing campus buildings and associated improvements to the campus site. These improvements would not increase the planned capacity, nor would it generate increased demands for fire protection and emergency services due to an increase in student population, including the need for a new fire station. During operation, the Project would not increase fire protection demands or emergency services because no residential, commercial, or industrial land uses are proposed. In addition, no new fire station would be required to maintain acceptable service ratios, response times, or any other performance objectives for fire protection or emergency services. The proposed Project would also be required to conform to LAFD and City of Los Angeles Department of Building and Safety requirements for water availability, fire hydrant pressure, and fire equipment accessibility. Prior to Project construction, SC-PS-1 shall be implemented:

Emergency services could experience temporary, short-term traffic delays and temporary and intermittent road detours around the Project area during construction. This could result in delayed response times for fire protection and emergency services. All circulation changes would be designed to help entry and exit of emergency response vehicles during construction phases.

In addition, a traffic control plan would be prepared and implemented during construction. While traffic delays are anticipated, emergency access would be maintained at all times. Prior to Project construction, SC-T-4 shall be implemented:

Construction of the Project is expected to improve traffic operations and would have beneficial effects on emergency response times in the Project vicinity. Overall, impacts to LAFD and other emergency service providers would be expected to be less than significant. The final Project design would maintain fire

department and emergency services access so no impacts would result. No mitigation measures or further analysis of this issue are required.

Police Protection. Less than Significant Impact. As stated in the Program EIR, the Los Angeles School Police Department (LASPD) is the primary provider of police protection to District schools, providing security to schools within its jurisdiction.[57] LASPD is the largest independent school police department in the United States, with over 350 sworn police officers, 126 nonsworn school safety officers, and 34 civilian support staff dedicated to serving LAUSD. An LASPD officer may provide on-campus security and officers would be made available to serve the proposed school, as necessary. General campus activities would be under the supervision of the principal, vice principal, teachers, and other campus employees.

In addition, police protection services for the Project location are provided by the City of Los Angeles Police Department (LAPD), West Valley Community Police station, located 2 miles south of the campus at 19020 Vanowen Street, Reseda.

A traffic control plan would be prepared and implemented during construction. While traffic delays are anticipated, emergency access would be maintained at all times. LAUSD and the construction contractor would coordinate with LAPD and other emergency service providers regarding construction activities that could affect the movement of traffic through intersections and potentially affect the ability to provide police and other emergency services. During operation, the Project would not increase law enforcement or emergency service demands because no increase in planned enrollment or student capacity is proposed. In addition, no additional facilities would be required to maintain acceptable service ratios, response times, or any other performance objectives for law enforcement or emergency services. Overall, impacts to LAPD and emergency services would be less than significant. No further analysis of this issue is required.

Schools. Less than Significant. The Miller Career and Transition Center (career and transition center for special education students) and Cleveland Early Education Center (day care facility) are both located within the Cleveland HS campus. Napa Street Elementary School and Blythe Street Elementary School are both located within 0.3 mile of the Project site. Implementation of the Project would not result in an increase in population, because no residential, commercial, or industrial land uses would be generated by the proposed Project. No new or expanded school facilities would be required and impacts from the proposed Project would be less than significant. No mitigation measures or further analysis of this issue are required.

Parks/Other Public Facilities. No Impact. The nearest park is located approximately 0.5 mile north of the proposed Project. Vanalden Park is located at 8956 Vanalden Avenue, Northridge. Cleveland HS Pool is a City of Los Angeles indoor public pool, located south of the school parking area (at 8120 Vanalden Avenue) and is more than 500 feet southwest of the Project site. The Los Angeles Public Library – Van Nuys Branch is located at 6250 Sylmar Avenue, Van Nuys (approximately 8 miles southeast from the Project). Northridge Hospital Medical Center is located more than 0.5 mile east of the Project site. As previously mentioned, implementation of the Project would not result in an increase in population because no new residential, commercial, or industrial land uses would be generated by the proposed Project. As such, the proposed Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental or public facilities, or the need for new or physically altered governmental or public facilities, the construction of which could cause significant environmental impacts, to maintain acceptable service ratios, response times, or other performance objectives for any of the public services. No further analysis of this issue is required.

[57] LAUSD SUP Final EIR, September 2015.

4.16. Recreation

ENVIRONMENTAL ISSUE	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
XV. 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?	☐	☐	☐	☒

a) No Impact. Cleveland HS Pool is a City of Los Angeles indoor public pool, located south of the school parking area (at 8120 Vanalden Avenue) and is more than 500 feet southwest of the Project site. The nearest park, Vanalden Park, is located approximately 0.5 mile north of the proposed Project at 8956 Vanalden Avenue, Northridge, CA 91324. Implementation of the proposed Project would construct new school buildings and, as such, would not result in an increase in population because no new residential, commercial, or industrial land uses would be generated. Therefore, the Project would not result in the increased use of existing neighborhood or regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated and as such, no impacts would result. No further analysis of this issue is required.

b) No Impact. The proposed Project involves new construction and improvements to an existing campus and associated improvements to the campus site. The Project does not include recreational facilities or require construction of recreational facilities, which might have an adverse effect on the environment because no residential, commercial, or industrial land uses are proposed; therefore, no impact would occur. No further analysis of this issue is required.

4.17. Transportation/Traffic

ENVIRONMENTAL ISSUE	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
XVI. TRANSPORTATION/TRAFFIC: Would the project:				
a) Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?	☐	☐	☒	☐
b) Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?	☐	☐	☒	☐
c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	☐	☐	☐	☒
d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☐	☒
e) Result in inadequate emergency access?	☐	☐	☐	☒

ENVIRONMENTAL ISSUE	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
f) Conflict with adopted policies, plans or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?	☐	☐	☐	☒

The information in this section is based on the Traffic Study Technical Memorandum (June 2017) prepared for this Project (see Appendix G). The Program EIR includes Standard Conditions for minimizing impacts to transportation/traffic in areas where projects would be implemented under the SUP. Applicable Standard Conditions related to transportation/traffic impacts for the proposed Project are listed below.

SC-T-2: ***School Design Guide.*** Vehicular access and parking shall comply with Section 2.3, Vehicular Access and Parking of the *School Design Guide,* January 2014. The *School Design Guide* contains the following regulations related to traffic:

- Parking requirements
- General parking guidelines
- Vehicular access and pedestrian safety
- Parking structure security

SC-T-4: LAUSD shall require its contractors to submit a construction worksite traffic control plan to LADOT for review prior to construction. The plan will show the location of any haul routes, hours of operation, protective devices, warning signs, and access to abutting properties. LAUSD shall encourage its contractor to limit construction-related trucks to off-peak commute periods. As required by Caltrans, applicable transportation-related safety measures shall be implemented during construction.

a) Less than Significant Impact. Cleveland HS is situated in a primarily residential neighborhood with some commercial development along Roscoe Boulevard. Cantara Street, a private street within the school, runs east-west through the northern portion of the site. An alleyway is situated north-south from Cantara Street through the campus site to Strathern Street. Regional transportation facilities serving the Project vicinity include I-405, located approximately 4 miles east of the Project site, and US 101, located approximately 3 miles south of the Project site. Local access to I-405 is provided by Roscoe Boulevard, and US 101 is accessed by Tampa Avenue and Reseda Boulevard.

Existing Roadways

Roscoe Boulevard is an east-west roadway located north of the campus and is designated as Boulevard II (Major Highway). It has three lanes in each direction in the Project vicinity and the posted speed limit is 40 mph. Sidewalks are present on both sides of Roscoe Boulevard.

Vanalden Avenue is a north-south roadway located west of the campus and is designated as a Collector Street. It has one lane in each direction in the Project vicinity and the posted speed limit is 30 mph. The primary entrance is located off Vanalden Avenue, which provides access to three parking lots within the campus. Parent drop-off occurs primarily within the neighborhood and along Vanalden Avenue and Cantara Street. Paved sidewalks are on the east side of Vanalden Avenue, the west side has intermittent sidewalks with a dirt setback that can be used for parking and pedestrian activity.

Strathern Street is an east-west roadway located south of the campus and is designated as a Collector Street in this area. It has one lane in each direction in the Project vicinity and no posted speed limit was observed. 15-minute parking during school days is posted on the north side of Strathern Street. Paved sidewalks are on both sides of Strathern Street.

Cantara Street is an interior service road within the school and runs east-west on the northern portion of the campus. It has one lane in each direction. Cantara Street connects Vanalden Avenue and Strathern Street. Cantara Street provides access for bus (for both Cleveland HS and the Joaquin Miller Career and Transition Center north of the campus), emergency, and delivery vehicles, as well as teacher and staff parking located internal to the site. Bus drop-off occurs along Cantara Street. Circulation for school buses exiting the school facilities runs from Cantara Street along the existing service road toward the Wilbur Avenue exit, east of the track and baseball fields. Parents dropping off or picking up along Cantara Street generally exit the site via the campus service road to Strathern Street. Paved sidewalks are on both sides of Cantara Street

Wilbur Avenue is a north-south roadway located east of the campus and is designated as Avenue II. It has two lanes in each direction in the Project vicinity and the posted speed limit is 40 mph. Wilbur Avenue provides access to the sports field and the Community Day Care, located on the eastern edge of the site along the transmission easement. The Humanities Magnet has a significant number of students who arrive and depart via bus and/or private parent-provided transportation. Paved sidewalks are on both sides of Wilbur Avenue.

Intersection Controls

Vanalden Avenue at Roscoe Boulevard is controlled by traffic signals and has yellow basic school crosswalks (solid lines marking both edges of the crosswalk).

Vanalden Avenue at Strathern Street is controlled by 4-way stop signs and has yellow basic school crosswalks on three of the four crossings, but not on the northbound approach.

Vanalden Avenue at Cantara Street (east) is controlled by a stop sign at Cantara Street. No crosswalks are present.

Vanalden Avenue at Cantara Street (west) is controlled by 3-way stop signs for the northbound and southbound traffic on Vanalden Avenue and westbound traffic on Cantara Street. A yellow basic school crosswalk is on the Vanalden Avenue northbound approach.

Vanalden Avenue at Lanark Street is controlled by 3-way stop signs for the northbound and southbound traffic on Vanalden Avenue and westbound traffic on Lanark Street. A yellow basic school crosswalk is on the Vanalden Avenue southbound approach.

Wilbur Avenue at Strathern Street is controlled by traffic signals and has yellow basic school crosswalks on three sides and has a yellow school crosswalk (horizontal stripes) on the west approach along Strathern Street.

Construction

The comprehensive modernization Project includes building demolition, new construction, remodel, modernizations, upgrades, and reconfiguration. It is anticipated that the Project would be built in two phases spanning approximately 36 months, from Q4-2018 to Q4-2021, and would generate construction-related trips from the work crew, haul trips, and equipment and materials delivery. According to Section 41.40 of the Los Angeles Municipal Code, construction or repair work is allowed between 7:00 AM and 9:00 PM, Monday through Friday, and between 9:00 AM and 6:00 PM on Saturdays.

Throughout construction, the size of the work crew at the school each day would vary depending on the construction phase and the different construction activities taking place. The highest number of worker trips would occur during the overlapping building construction and architectural coating activities in phase 1, with an anticipated maximum of 50 worker trips per day.[58] Compared to the traffic generated by the school with 3,942 students (estimated at 6,741 ADT) (see Table 10), 50 worker trips per day is negligible.

[58] Worker trips based on California Emissions Estimator Model (CalEEMod), version 2016.3.1.

Table 10 – Existing Campus Trip Generation

Trip Generation Rates									
			Trip Generation Rates[1]						
				AM Peak Hour			PM Peak Hour		
Land Use	ITE Code	Unit	Daily	In	Out	Total	In	Out	Total
High School	530	Students	1.71	0.29	0.14	0.43	0.06	0.07	0.13
Trip Generation									
			Trip Generation						
				AM Peak Hour			PM Peak Hour		
Land Use	Number of Students		Daily	In	Out	Total	In	Out	Total
High School	3,942		6,741	788	552	1,695	237	244	454
Total	3,942		6,741	788	552	1,695	237	244	454

[1] Trip generation rates for peak hour of adjacent streets, per the ITE Trip Generation Manual 9th Edition.

Additionally, on most days the number of workers would be less. Based on the anticipated construction schedule, construction workers are expected to arrive at the school between 6:00 AM and 7:00 AM (before peak morning commute hours). Construction workers are not all likely to arrive at the construction site within the same hour, nor would they all leave the site at the same time. Importantly, construction worker trips and construction haul trips would not occur at the same time because workers would arrive before 7:00 AM and hauling cannot start until 7:00 AM. Typical construction hours end after 4:00 PM, after student dismissal times.

Parking for workers is anticipated to be provided on site in the staging area during all phases of construction. Construction workers would not be allowed to park on local streets and therefore would not affect street parking. Construction worker traffic would not significantly impact nearby roadways.

Construction Haul Trips

Construction would include hauling of soil, asphalt demolition debris, building demolition debris, relocatable buildings, and equipment and materials. The highest number of haul trips per day would occur during the construction site preparation activity in phase 1 and phase 2. Site Prep/Modernization activities in each phase would export approximately 2,147 cubic yards of soil, for a total of 184 truckloads.[59] The anticipated two-month schedule for soil haul would require an average of 145 truckloads of export per day, for a total of 329 truck trips per phase. The anticipated three-month schedule for demolition and site preparation would require an average of about 5 truckloads of export per day, for a total of 5 trucks inbound and 5 trucks outbound from the construction site per day.[60]

Compared to the traffic generated by the school with 3,942 students (estimated at 6,741 ADT[61] 55 trips (50 worker trips per day and average of 5 truckloads per day) is negligible. Additionally, truck trips would be spread out throughout the workday and would occur during non-peak traffic periods in accordance with SC-T-4.

Temporary delays in traffic may occur due to oversized vehicles traveling at lower speeds on streets. Such delays would be occasional and of short duration. The temporary traffic delays would only occur during a relatively short period of two months during phase 1 and two months during phase 2. During the 12-month building construction period, there would be traffic on an average of 12 truck trips per day with a maximum

59 14 cubic yards per truckload.
60 Three months equates to 65 working days.
61 2001-10 Traffic Volume Book. http://ladot.lacity.org/what-we-do/traffic-volume-counts/current-count-data.

of 20 truck trips per day during demolition and 35 during site preparation. Given the small number of trips per day and the duration of the construction phases, these temporary delays are considered less than significant.

To minimize potential conflicts between construction activity and street traffic, a construction worksite traffic control plan would be submitted to the City for review and approval. Construction equipment, materials traffic, and haul trucks would be restricted to truck routes approved by the City of Los Angeles Department of Building and Safety. These do not include neighborhood streets.

Construction vehicles would cause only temporary and intermittent increases in traffic on area roadways, and would not contribute to a significant increase in traffic volumes. Construction traffic would be less than significant. The Project would not increase the planned capacity at the school, nor would it generate growth. The Project proposes to replace existing classroom buildings, the maintenance building and food service/ multipurpose rooms, and would not create a new facility that would increase the number of students or vehicular trips. Operational impacts would be less than significant.

Construction of the proposed Project would include onsite demolition, excavation, stockpiling, and grading activities. In addition, trucks would intermittently be delivering materials to the site. According to LAUSD's BMPs, 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.

Approximately 40-50 workers are expected at the construction site each day, and they are expected to work between 7:00 a.m. and 4:00 p.m., 5 days per week. Haul routes would be determined by the design-build team and they would be reviewed and approved by LAUSD and LADOT prior to the operation commencement.

In addition, these construction workers would be commuting from within the region and are already using the roadways. The surrounding roadways would be able to support this increase in traffic from construction workers and truck activity. Potential Project-related construction impacts would be mitigated by compliance with LAUSD Standard Conditions and incorporation of Project design features, such as limiting construction-related trucks to off-peak commute periods.

SC-T-2 requires compliance with the LAUSD *School Design Guide* during the Project design phase and addresses the following regulations related to traffic: parking space requirements, general parking guidelines, vehicular access and pedestrian safety, and parking structure security. SC-T-4 would also be implemented prior to construction to further reduce potential construction-related traffic impacts.

With implementation of SC-T-2 and SC-T-4, the proposed Project would not conflict with an applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system, and impacts would be less than significant. No mitigation measures or further evaluation are required.

b) Less than Significant Impact. The Project would not conflict with CMP standards because construction and operation of the proposed Project would not add 50 or more trips on streets adjacent to the CMP intersection during the AM and PM peak hours, nor would it add 150 or more trips on the freeway, in either direction, during the AM and PM peak periods. As discussed above, during Project construction, there could be up to 50 workers onsite on an intermittent basis. Furthermore, incorporation of SC-T-4 would encourage construction-related truck activity to off-peak commuter periods. As such, the Project would not conflict with the applicable CMP, and impacts would be less than significant. No mitigation measures or further evaluation are required.

c) No Impact. The proposed site is not located within an area subject to an airport land use plan, within two miles of a public airport or public use airport, or near a private airstrip. The closest airport is Van Nuys Airport, which is located approximately three miles from the Project site. In addition, projects conducted on existing campuses that do not involve the acquisition of new property, such as the proposed Project, are not required to review airport safety or noise impacts. As such, no impact would occur in this regard. No further analysis of this issue is required.

d) No Impact. The proposed Project would be designed in accordance with standard engineering practices, such as standard driveway widths and turning radii and the provision of adequate line of sight to avoid design elements that could result in hazards. In addition, the Project would comply with the LAUSD *School Design Guide* Section 2.3, regarding vehicular access and parking. The Project design would also be required to accommodate access by emergency vehicles, in accordance with LAFD regulations and local ordinances. The onsite service road would provide required emergency vehicle access. The Project would not substantially increase hazards due to a design feature or incompatible uses, and there would be no impact in this regard. No further analysis of this issue is required.

e) No Impact. The proposed Project would be implemented in accordance with LAFD regulations and local ordinances, and the Project would be required to accommodate access by emergency vehicles. The onsite service road would provide required emergency vehicle access; therefore, there would be no impact in this regard. No further analysis of this issue is required.

f) No Impact. Students, faculty, and staff can currently travel to school using public transit routes, bicycles, and by walking. The site is located on a mature network of pedestrian facilities. In addition, LAUSD encourages ride-sharing programs for students and teachers, as well as riding bicycles to school.

There are sidewalks along both sides of Strathern Street, both sides of Wilbur Avenue, both sides of Cantara Street, and along the school frontage of Vanalden Avenue. The west side of Vanalden Avenue has intermittent sidewalks with a dirt setback from the street that can be used for parking and pedestrian activity. Transit service to the Project site is provided by Metro, which operates Bus Lines 152/353, 242, and 744 near the school.[62] Bus Line 152/353 operates in Reseda along Roscoe Boulevard, with the closest stop to the school on the north end of the block at the corner of Roscoe Boulevard and Vanalden Avenue.[63] Bus Line 242 also operates in Reseda along Tampa Avenue, with the closest stop to the school 0.3 mile away at the corner of Tampa Avenue and Strathern Street.[64] Regional service is provided by the Metro Rapid Service along Reseda Boulevard, which offers a limited number of service stops for faster routes. The stop nearest the school is located at the corner of Reseda Boulevard and Roscoe Boulevard, which is approximately 0.7 mile from the campus. The nearest station of the Metrolink Line, which provides rail service between downtown Los Angeles and the Antelope Valley, is 1.2 miles from the school and is located on the corner of Parthenia Street and Wilbur Avenue. Project construction and operation would have no impact on the performance or safety of public transit, bicycle, or pedestrian facilities. No further analysis of this issue is required.

62 Los Angeles County Metropolitan Transportation Authority (Metro). Website Accessed - https://www.metro.net/.
63 Ibid.
64 Ibid.

4.18. Tribal Cultural Resources

ENVIRONMENTAL ISSUE	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
XVII. TRIBAL CULTURAL RESOURCES: Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in PRC Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that:				
a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in PRC Section 5020.1(k)?	☐	☐	☒	☐
b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of PRC Section 5024.1. In applying the criteria set forth in subdivision (c) of PRC Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?	☐	☐	☐	☒

The Program EIR includes Standard Conditions for minimizing impacts to tribal cultural resources (TCRs) in areas where projects would be implemented under the SUP. Applicable Standard Conditions related to TCR impacts for the proposed Project are listed below.

~~SC-CUL-18~~SC-TCR-1 **Native American Resource.** All work shall stop within a 30-foot radius of the discovery. Work shall not continue until the discovery has been evaluated by a qualified archaeologist and the local Native American representative has been contacted and consulted to assist in the accurate recordation and recovery of the resources.

a) Less than Significant Impact. AB 52 requires meaningful consultation with California Native American Tribes on potential impacts to TCRs, as defined in PRC Section 21074. TCRs are sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either eligible or listed in the CRHR or local register of historical resources.[65]

As part of the AB 52 process, Native American tribes must submit a written request to LAUSD (lead agency) to be notified of projects within their traditionally and culturally affiliated area. LAUSD must provide written, formal notification to those tribes within 14 days of deciding to undertake a project. The tribe must respond to LAUSD within 30 days of receiving this notification if they want to engage in consultation on the Project, and LAUSD must begin the consultation process within 30 days of receiving the tribe's request. Consultation concludes when either (1) the parties agree to mitigation measures to avoid a significant effect on a TCR, or (2) a party, acting in good faith and after reasonable effort, concludes mutual agreement cannot be reached.

The District has not received any Tribal requests to be notified about projects within the District. No sites were documented in the NAHC's sacred land file search. However, if Native American resources are discovered, ~~SC-CUL-18~~SC-TCR-1 would be implemented and impacts would be less than significant. With implementation of ~~SC-CUL-18~~SC-TCR-1, potential impacts related to Native American resources would be less than significant. No mitigation measures or further evaluation is required.

b) No Impact. LAUSD has not received any requests for notification or consultation from California Native American tribes regarding resources defined by PRC Section 21074. There is no substantial evidence that TCRs are present on the Project site; therefore, the proposed Project would not be expected to result in an impact related to TCRs. No further analysis of this issue is required.

[65] California Natural Resources Agency. AB 52 Regulatory Update. http://resources.ca.gov/ceqa/.

4.19. Utilities/Public Services

ENVIRONMENTAL ISSUE	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
XVII. UTILITIES AND SERVICE SYSTEMS: Would the project:				
a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	☐	☐	☐	☒
b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	☐	☐	☐	☒
c) Require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	☐	☐	☒	☐
d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	☐	☐	☒	☐
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?	☐	☐	☒	☐
f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	☐	☐	☒	☐
g) Comply with federal, state, and local statutes and regulations related to solid waste?	☐	☐	☐	☒

The Program EIR includes Standard Conditions for minimizing impacts to utilities and service systems in areas where projects would be implemented under the SUP. Applicable Standard Conditions related to utilities and service systems impacts for the proposed Project are listed below.

SC-HWQ-1 **Stormwater Technical Manual.** This manual establishes design requirements and provides guidance for the cost-effective improvement of water quality in new and significantly redeveloped LAUSD school sites. These guidelines are intended to improve water quality and mitigate potential impacts to the MEP. While these guidelines meet current postconstruction SUSMP requirements, the guidelines address the mandated postconstruction element of the NPDES program requirements.

SC-HWQ-2 **Compliance Checklist for Stormwater 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 an SWPPP; BMPs for minimizing stormwater pollution to be specified in an SWPPP; and monitoring stormwater discharges to ensure that sedimentation of downstream waters remains within regulatory limits.

SC-USS-1 **School Design Guide.** Construction and demolition waste shall be recycled to the maximum extent feasible. LAUSD has established a minimum nonhazardous construction and demolition debris recycling requirement of 75 percent by weight as defined in Specification 01340, Construction & Demolition Waste Management.

Guide Specifications 2004 – Section 01340, Construction & Demolition Waste Management. This section of the LAUSD Specifications includes procedures for preparation and implementation, including reporting and documentation, of a Waste Management Plan for reusing, recycling, salvage, or disposal of nonhazardous waste materials generated during demolition and/or new construction (Construction &

Demolition [C&D] Waste), to foster material recovery and reuse, and to minimize disposal in landfills. Requires the collection and separation of all C&D waste materials generated onsite, reuse or recycling onsite, transportation to approved recyclers or reuse organizations, or transportation to legally designated landfills, for the purpose of recycling salvaging and/or reusing a minimum of 75 percent of the C&D waste generated.

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

SC-GHG-1 During school operation, LAUSD shall perform regular preventive maintenance on pumps, valves, piping, and tanks to minimize water loss.

SC-GHG-2 LAUSD shall utilize automatic sprinklers set to irrigate landscaping during the morning and evening hours to reduce water loss from evaporation.

SC-GHG-3 LAUSD shall reset automatic sprinkler timers to water less during cooler months and the rainy season.

SC-GHG-4 LAUSD shall develop a water budget for landscape (both nonrecreational and recreational) and ornamental water use to conform to the local water efficient landscape ordinance~~City of Los Angeles Water Efficient Landscape Ordinance (No. 170978)~~. If no local ordinance is applicable, then use the landscape and ornamental budget outlined by the California Department of Water Resources.

a) No Impact. Wastewater for the Project area is treated through the Donald C. Tillman Water Reclamation Plant (Plant) located at 6100 Woodley Avenue, Van Nuys. This plant treats 80 million gallons of wastewater per day. The proposed Project involves demolition of existing buildings; construction, modernization, and seismic retrofit of school facilities; and sitewide infrastructure upgrades with no increase in the planned student capacity. Therefore, the proposed Project would not result in additional wastewater treatment capacity requirement above the current level. During construction, portable toilets would be provided for construction workers and the waste disposed of offsite via a certified waste hauler. No impacts on wastewater treatment requirements would occur. No further analysis of this issue is required.

b) No Impact. The proposed Project involves demolition of existing buildings; construction, modernization, and seismic retrofit of school facilities; and sitewide infrastructure upgrades with no increase in the planned student enrollment or capacity. Therefore, the proposed Project would not result in additional wastewater treatment capacity requirement above the current level. Water would be used during Project construction for fugitive dust control. Any onsite improvements and connections to offsite infrastructure would be provided by LAUSD. The amount of water used during construction would be minimal, and usage would cease after construction has been completed; therefore, there would be no impacts on wastewater treatment facilities. No further analysis of this issue is required.

c) Less than Significant Impact. The proposed Project would result in a minimal increase in the amount of impervious surfaces due to new buildings and infrastructure upgrades. Water flows from existing and new impervious surfaces would discharge to existing stormwater collection facilities. The existing drainage condition of the campus would be replaced within the limits of the modernization program. This would require the design and installation of a new underground storm drain system to mitigate the peak flow within the new areas of construction. Storm drainage system and design, as well as water mitigation, shall meet all LAUSD, county, and state requirements. Existing catch basins and associated piping would not be expanded as a result of the proposed Project. No other stormwater drainage facilities would be required. Potential impacts from stormwater runoff would not exceed drainage capacity due to the Project's design features and its conformance with NPDES permit requirements and regulations.

All LAUSD construction projects are required to comply with regulatory requirements if land disturbance is greater than 1 acre. The proposed Project would be required to prepare and implement a sediment and erosion control plan that follows the BMPs outlined by the State Water Resources Control Board to comply with a Construction General permit, including development of an SWPPP, as required by the Regional Water Quality Control Board's NPDES permit. Incorporation of SC-HWQ-1 (Stormwater Technical Manual) and SC-HWQ-2 (Compliance checklist for Stormwater Requirements at Construction Sites) would ensure compliance with applicable environmental regulations.

The proposed Project is expected to have less than significant impacts on onsite and adjacent stormwater drainage facilities. No mitigation measures or further analysis is required.

d) Less than Significant Impact. The proposed Project involves demolition of existing buildings; construction, modernization, and seismic retrofit of school facilities; and sitewide infrastructure upgrades with no increase in the planned student enrollment or capacity. Existing water supplies are sufficient to serve the Project. Water supplies utilized to serve students at Project operation would be similar to current water consumption levels. Water would be required during Project construction for fugitive dust control. The amount of water used during construction would be minimal and would not result in insufficient existing entitlements or resources or require new or expanded entitlements. Minimal water would be required for proposed Project landscaping, although drought-tolerant plant species and automatic timer irrigation would be utilized in the landscaping design. Incorporation of SC-USS-2 and SC-GHG-1 through SC-GHG-4 would ensure impacts would be less than significant.

No new or expanded water entitlements would be needed. Water supplies are sufficient to serve the Project from existing entitlements and resources, and with implementation of LAUSD standard conditions and PDFs, impacts would be less than significant. No mitigation measures or further analysis is required.

e) Less than Significant Impact. The proposed Project involves demolition of existing buildings; construction, modernization, and seismic retrofit of school facilities; and sitewide infrastructure upgrades with no increase in the planned student enrollment or capacity. No increase in wastewater capacity beyond the level required for the planned enrollment for the school is anticipated. During construction, portable toilets would be provided for construction workers and the waste disposed of offsite via a certified waste hauler. Accordingly, treatment capacity by the local wastewater treatment provider .would be less than significant. No mitigation measures or further analysis is required.

f) Less than Significant Impact. Project operation would not expand total solid waste generation. Calabasas Landfill, located near Agoura Hills, would serve the proposed Project. The landfill has sufficient permitted capacity to accommodate the Project's solid waste disposal needs. The current capacity of this landfill is 14.5 million cubic yards, and the maximum permitted throughput capacity is 3,500 tons per day. The proposed Project would comply with applicable laws, regulations, and LAUSD Conditions of Approval and PDFs. Construction and demolition associated with the Project would comply with waste recycling/reuse requirements of the CALGreen Section 5.408, and LAUSD School of Design and Specification 01340, Construction & Demolition Waste Management, as described under SC-USS-1.

The proposed Project would create construction waste that would require disposal in local landfills. As appropriate, construction waste would be recycled in accordance with Los Angeles County requirements. The amount of material would be limited and would cease once construction is completed. Construction debris would be disposed of in accordance with federal, State, and local regulations related to recycling, which would minimize the amount of waste material entering local landfills. The impact to local landfills (including Calabasas Landfill) would be less than significant. No mitigation measures or further analysis is required.

g) No Impact. Solid waste generated by the Project would be limited to construction debris and would be disposed of in accordance with federal, State, and local regulations. LAUSD requires its contractors to reuse, recycle, salvage, or dispose of nonhazardous waste materials generated during Project demolition

and/or new construction, to foster material recovery and reuse, and to minimize disposal in landfills. With the incorporation of SC-USS-1, no impacts would occur during Project construction and operation. Compliance with federal, State and local regulations related to solid waste diversion, reduction, and recycling would be required. As a result, no impacts related to solid waste regulations would occur. No further analysis of this issue is required.

4.20. Mandatory Findings of Significance

ENVIRONMENTAL ISSUE	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
XVIII. MANDATORY FINDINGS OF SIGNIFICANCE				
a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☐	☐	☒	☐
b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	☐	☐	☒	☐
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☐	☒	☐

a) Less than Significant. The proposed Project involves demolition of existing buildings; construction, modernization, and seismic retrofit of school facilities; and sitewide infrastructure upgrades with no increase in the planned student enrollment or capacity. The Project site and the surrounding study area are built out with campus, residential, and public facility uses. There are no natural communities or rare and endangered plant or animal species. Cleveland HS is eligible as an historical resource, and Project impacts would be potentially significant; however, with implementation of LAUSD standard conditions described in the discussion in Section V, Cultural Resources, these impacts would be reduced to less than significant. There may be historically significant resources on or near the Project site. While the proposed Project does not have the potential to substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, or reduce the number or restrict the range of rare or endangered plants or animals, it does have the potential to degrade the quality of the environment through air emissions and to affect important examples of the major periods of California history or prehistory, and conformance with LAUSD Standard Conditions, PDFs, and applicable federal, State, and City regulations would be necessary. Impacts to biological and cultural resources would be reduced to less than significant impacts with implementation of LAUSD Standard Conditions for these resources.

b) Less than Significant Impact. Although the Project would demolish, construct, and upgrade campus buildings with associated site improvements, the impacts relevant to the proposed Project are localized and confined to the immediate study area. As discussed in Section III, Air Quality, Project construction emissions are not expected to result in a cumulatively considerable net increase in any criteria air pollutant for which SCAQMD has established a local threshold. The Project vicinity is within an established residential neighborhood with single-family homes and some neighborhood commercial. Based on a review of land development projects from the City of Los Angeles Department of City Planning and Reseda neighborhood council websites, such projects are occurring over 1.5 miles from the Project site and not within the immediate Project vicinity. Cumulative impacts associated with other resources, such as cultural resources, GHG emissions, noise, and transportation/traffic issues, would be less than significant.

Accordingly, impacts from the Project and area land developments are not expected to be cumulatively considerable and would be addressed through standard regulatory requirements.

c) Less than Significant Impact. Based on the analyses of the Project construction and operations presented in this checklist, it is anticipated that the proposed Project would not cause substantial direct or indirect adverse effects on human beings. Potential impacts to air quality, cultural resources, hydrology and water resources, noise, and traffic/transportation (in addition to those resources with no impacts) would be reduced to less than significant levels through the use of standard regulatory requirements and/or implementation of LAUSD SCs of Approval and PDFs, in addition to conformance with applicable federal, State, and City regulations.

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5. LIST OF PREPARERS AND PERSONS CONSULTED

5.1. Lead Agency

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

Linda Wilde, CEQA Project Manager – Contract Professional

Debi Howell-Ardila, Historic Resource Specialist – Contract Professional

Gwenn Godek, CEQA Advisor – Contract Professional

5.2. CEQA Consultant

Parsons

Anne Kochaon, QEP, Director, Quality Assurance/Quality Control

Jessica C. Wilkinson, AICP, Senior Project Manager

Joza Burnam, Noise Specialist

Bruce Campbell, AICP, Air Quality Specialist

Raizalyn Chau, P.E., Traffic/Transportation

Sandi Domingue, Pedestrian Safety, Traffic/Transportation

Vincent Tong, Environmental Planner

Tony Hui, Associate Environmental Planner

Elizabeth Koos, Technical Editor

Applied Earthworks

M. Colleen Hamilton, M.A, RPA, Architectural Historian

Justin V. Castells, M.A., Architectural Historian

5.3. Persons Consulted

Damian Goodman, Vice-Principal, Grover Cleveland High School. Consulted on November 10, 2016. Topic: Current pedestrian and vehicular traffic conditions.

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