December 2017 | Initial Study

ULYSSES S. GRANT SENIOR HIGH SCHOOL COMPREHENSIVE MODERNIZATION

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AB	Assembly Bill
ACM	asbestos-containing materials
ADA	Americans with Disabilities Act
ADT	average daily traffic
AHERA	Asbestos Hazard Emergency Response Act
AQMP	Air Quality Management Plan
ASTM	American Society for Testing and Materials
BMP	best management practices
BOE	Board of Education
C&D	construction and demolition
CAAQS	California Ambient Air Quality Standards
CalEEMod	California Emissions Estimator Model
CBC	California Building Code
CEQA	California Environmental Quality Act
CCR	California Code of Regulations
CDFW	California Department of Fish and Wildlife
CFR	Code of Federal Regulations
CGS	California Geological Survey
CHRIS	California Historic Resources Inventory System
CMP	Congestion Management Program
CNDDB	California Natural Diversity Database
CNEL	Community noise equivalent level
CNPS	California Native Plant Society
CO	Carbon monoxide
CUPA	Certified Unified Program Agency
dBA	A-weighted decibels
DSA	Division of State Architect
EIR	environmental impact report
ESA	Environmental Site Assessment
FETU	Facilities Environmental Technical Unit
GIS	Geographic Information System
GHG	greenhouse gas
HCP	Habitat Conservation Plan
HTP	Hyperion Treatment Plant
HVAC	Heating, ventilation, and air conditioning
IDA	International Dark-Sky Association
IES	Illuminating Engineering Society
IPAC	Information, Planning and Conservation
IS	Initial Study
LADOT	Los Angeles Department of Transportation
LADWP	Los Angeles Department of Water and Power
LAFD	Los Angeles Fire Department
LAPD	Los Angeles Police Department
LASPD	Los Angeles School Police Department
LAUSD	Los Angeles Unified School District
LBP	lead based paint
L_{dn}	day-night average noise

L_{eq}	average ambient noise levels
LID	Low Impact Development
LOS	Level of Service
M&O	Maintenance and Operations
MBTA	Migratory Bird Treaty Act
MEP	Maximum Extent Practicable
Metro	Los Angeles County Metropolitan Transportation Authority
mgd	million gallons per day
MLO	Model Lighting Ordinance
MND	mitigated negative declaration
NAAQS	National Ambient Air Quality Standards
NAHC	Native American Heritage Commission
NCCP	Natural Community Conservation Plan
ND	negative declaration
NO_2	Nitrogen dioxide
NPDES	National Pollutant Discharge Elimination System
O_3	ozone
OCP	organochlorine pesticide
OSHA	Occupational Safety and Health Administration
PCE	Passenger-Car Equivalence
PEA	Preliminary Environmental Assessment
PF	Public Facilities
Project	Ulysses S. Grant High School Comprehensive Modernization Project
PM	particulate matter
PRC	Public Resources Code
RAW	Removal Action Workplan
RCRA	Resource Conservation and Recovery Act
REC	recognized environmental concerns
ROG	reactive organic gases
RTP/SCS	Regional Transportation Plan/Sustainable Communities Strategy
RWQCB	Regional Water Quality Control Board
SB	Senate Bill
SC	Standard Conditions of Approval
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SCH	State Clearing House
SCS	Sustainable Communities Strategy
SLF	Sacred Lands File
SMARA	Surface Mining and Reclamation Act
SO_2	Sulfur dioxide
SRA	source receptor area
SUP	School Upgrade Program
SUSMP	Standard Urban Stormwater Mitigation Plan
SWPPP	Storm Water Pollution Prevention Plan
TCR	tribal cultural resource
USFWS	United States Fish and Wildlife Service
UST	underground storage tank
VOC	volatile organic compound

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1.0 INTRODUCTION

1.1 Overview

The Los Angeles Unified School District (LAUSD or District) is proposing a comprehensive modernization of Ulysses S. Grant High School (Grant High School), 13000 Oxnard Street, Valley Glen, Los Angeles County, California. Comprehensive modernization projects are designed to address the most critical physical needs of the buildings and grounds at the campus through building replacement, renovation, modernization, and reconfiguration. The comprehensive modernization project at Grant High School (proposed Project) is required to undergo an environmental review pursuant to the California Environmental Quality Act (CEQA). This initial study provides an evaluation of the potential environmental consequences associated with this Project.

1.2 Background

On July 31, 2008, the LAUSD Board of Education (BOE) adopted a Resolution Ordering an Election and Establishing Specifications of the Election Order for the purpose of placing 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 BOE could authorize the issuance of bond funds.

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 District school facilities and educational goals. Between July 2013 and November 2015, the SUP was analyzed under CEQA criteria in a Program Environmental Impact Report (Program EIR). On November 10, 2015, the BOE certified the Final SUP Program EIR.

On March 10, 2015, the BOE approved pre-design and due diligence activities necessary to develop a project definition for a comprehensive modernization project at Grant High School. The comprehensive modernization projects are intended to complete large-scale improvements to address the buildings and grounds in the greatest need of upgrades.[1]

On April 12, 2016, the BOE approved the project definition for the proposed Project to provide facilities that are safe, secure, and aligned with the current instructional program. This approval authorized LAUSD's Facilities Services Division to proceed with Project design and the completion of related technical and regulatory processes.

1.3 California Environmental Quality Act

The environmental compliance process is governed by CEQA and the State CEQA Guidelines. 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

[1] LAUSD Board of Education Report. March 10, 2015. Report Number 373 – 14/15. Subject: Identification of 11 School Sites for the Development of Comprehensive Modernization Projects.

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 is the lead agency for this proposed Project and is therefore required to conduct an environmental review to analyze the potential environmental effects associated with the proposed 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 initial study is required to determine whether there is substantial evidence that construction and operation of the proposed Project would result in environmental impacts. An initial study is a preliminary environmental analysis to determine whether an EIR, a mitigated negative declaration (MND), or a negative declaration (ND) is required for a project.

When an initial study identifies the potential for significant environmental impacts, the lead agency must prepare an EIR; 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.

1.4 Environmental Process

A "project" means the whole of an action that has a potential for resulting in either a direct physical change in the environment, or a reasonably foreseeable indirect physical change in the environment, and that is any of the following:

1) An activity directly undertaken by any public agency including but not limited to public works construction and related activities clearing or grading of land, improvements to existing public structures, enactment and amendment of zoning ordinances, and the adoption and amendment of local General Plans or elements thereof pursuant to Government Code Sections 65100-65700.
2) An activity undertaken by a person which is supported in whole or in part through public agency contacts, grants, subsidies, loans, or other forms of assistance from one or more public agencies.
3) An activity involving the issuance to a person of a lease, permit, license, certificate, or other entitlement for use by one or more public agencies. (California Code of Regulations [CCR] § 15378[a])

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

1.4.1 Initial Study

This initial study was prepared in accordance with CEQA and the CEQA Guidelines, as amended, to determine if the Project could have a significant impact on the environment. The purpose of this initial study, as described in the State CEQA Guidelines Section 15063, is to 1) provide the lead agency with information to use as the basis for deciding whether to prepare an EIR or ND; 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 the preparation of an EIR, if one is required; 4) facilitate environmental assessment early in the design of a project; 5) provide documentation of the factual basis for the finding in an ND that a project will not have a significant effect on the environment; 6) eliminate unnecessary EIRs; and 7) determine whether a previously prepared EIR

could be used with the project. The findings in this initial study have determined that an MND is the appropriate level of environmental documentation for this project.

1.4.2 Mitigated Negative Declaration and Supporting Initial Study

The initial study and MND includes information necessary for agencies to meet statutory responsibilities related to the proposed Project. State and local agencies will use the initial study/MND when considering any permit or other approvals necessary to implement the Project. A list of the environmental topics that have been identified for study is provided in the Initial Study Checklist (Chapter 4).

One of the primary objectives of CEQA is to enhance public participation in the planning process; public involvement is an essential feature of CEQA. Community members are encouraged to participate in the environmental review process, request to be notified, monitor newspapers for formal announcements, and submit substantive comments at every possible opportunity afforded by the District. The environmental review process provides several opportunities for the public to participate through public notice and public review of CEQA documents and public meetings. Additionally, LAUSD is required to consider comments from the Draft Initial Study/MND and to respond to the Draft Initial Study/MND public comments in the Final Initial Study/MND.

1.4.3 Tiering

This type of project is one of many that were analyzed in the LAUSD SUP Program EIR that was certified by the LAUSD BOE on November 10, 2015.[2] LAUSD's Program EIR meets the criteria for a Program EIR under CEQA Guidelines Section 15168 (a)(4) as one "prepared on a series of actions that can be characterized as one large project and are related…[a]s individual activities carried out under the same authorizing statutory or regulatory authority and having generally similar environmental effects which can be mitigated in similar ways."

The certified Program EIR enables LAUSD to streamline future environmental compliance and reduces the need for repetitive environmental studies.[3] The Program EIR serves as the framework and baseline for CEQA analyses of later projects through a process known as "tiering." Under CEQA Guidelines Sections 15152(a) and 15385, "Tiering" refers to using the analysis of general matters contained in a broader EIR (such as one prepared for a program) with later EIRs and negative declarations on narrower projects; incorporating by reference the general discussions from the broader EIR; and concentrating the later EIR or negative declaration solely on the issues specific to the later project.[4]

The Program EIR is applicable to all projects implemented under the SUP. The Program EIR provides the framework for evaluating environmental impacts related to ongoing facility upgrade projects planned by the District.[5] Due to the extensive number of individual projects anticipated to occur under the SUP, projects were grouped into four categories based on the amount and type of construction proposed. The four categories of projects are as follows:[6]

- Type 1 – New Construction on New Property
- Type 2 – New Construction on Existing Campus

2 LAUSD. 2015. Program EIR for the School Upgrade Program. Available at: http://achieve.lausd.net/ceqa.
3 LAUSD. 2015. Program EIR for the School Upgrade Program. Available at: http://achieve.lausd.net/ceqa.
4 CEQA Guidelines Section 15152(a).
5 *Ibid*, at 4-8.
6 *Ibid*, at 1-7.

- Type 3 – Modernization, Repair, Replacement, Upgrade, Remodel, Renovation, and Installation
- Type 4 – Operational and Other Campus Changes

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

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

1.4.4 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 (SCs), 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 in 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

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.

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 SCs are uniformly applied development standards and were adopted by the LAUSD Board in November 2015.[9] The SCs have been updated since the adoption of the 2015 version in order to incorporate and reflect changes in the recent laws, regulations and the LAUSD's standard policies, practices and specifications. The SCs were compiled from established LAUSD standards, guidelines, specifications, practices, plans, policies, and programs, as well as typically applied mitigation measures. The conditions are divided into the 18 LAUSD CEQA environmental topics (Appendix G of the CEQA Guidelines plus Pedestrian Safety).[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 SCs, there are still significant environmental impacts, then feasible and project-specific mitigation measures are required to reduce impacts to less than significant levels. Mitigation under CEQA Guidelines Section 15370 includes:

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

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

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

1.5 Impact Terminology

The following terminology is used to describe the level of significance of impacts for each topic analyzed.

- A finding of ***no impact*** is appropriate if the analysis concludes that the project would not affect the particular topic area in any way.

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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.

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.

- 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.

1.6 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 Initial Study 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 IS/MND and the terminology used.

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*, provides an overview of the Project objectives, a description of the proposed development, Project phasing during construction, and discretionary actions for the approval of the Project.

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 LAUSD SCs and mitigation measures, as applicable. Bibliographical references and individuals cited for information sources and technical data are footnoted throughout this CEQA Initial Study; therefore, a stand-alone bibliography section is not required. This Initial Study evaluates the "worst case" assessment based upon the development presented within the design concept.

Chapter 5, *List of Preparers*, identifies the technical experts, report authors, and supporting personnel.

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

A. Air Quality Technical Report
B. Biological Resources
   B-1 - CDFW - California Natural Diversity Database (CNDDB)
   B-2 - USFWS - Information for Planning and Conservation (IpaC) Query
   B-3 - CNPS - Inventory of Rare and Endangered Plants Query (8th Edition)
   B-4 - Grant High School Tree Inventory (2016)
C. Historic Resources Report (Sapphos)
D. Geotechnical Evaluation [Ninyo & Moore]
E. Site Assessment Report [Waterstone Environmental, Inc.]
F. Noise and Vibration Impact Analysis
G. Traffic Study Technical Memorandum
H. Cultural Resources Report (UltraSystems)

I. 2017 LAUSD Standard Conditions of Approval
J. Response to Comments

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2.0 ENVIRONMENTAL SETTING

2.1 Project Location

Grant High School is located on a 32.4-acre site at 13000 Oxnard Street (Assessor's Parcel Number [APN] 2341-024-900) in the Valley Glen community of Los Angeles, California. The campus is bound by Oxnard Street to the north, Lancer Lane (an onsite, private access road) to the east, Hatteras Street to the south, and Ethel Avenue to the west. The Los Angeles River concrete channel and Coldwater Canyon Avenue are also east of the campus and parallel Lancer Lane. In addition, Los Angeles Valley College borders Grant High School to the south and west. Figures 2.1-1 and 2.1-2 show the site in its regional and local contexts, respectively. Regional access to the campus is provided by Oxnard Street, Coldwater Canyon Avenue and Burbank Boulevard.

2.2 Surrounding Land Use

The Project site is located in a developed urban environment. The area north of the campus is zoned as low-medium density multi-family residential and single-family residential. The Los Angeles Valley College campus is immediately to the south and west of the Grant High School campus and is zoned Public Facilities. The area to the east is zoned as Open Space (a greenbelt bordering the concrete lined Los Angeles River), and single-family and multi-family residential east of Coldwater Canyon Boulevard.

2.3 Existing Conditions

The campus is organized around five Small Learning Communities and also houses a Communications Technology Magnet Center, the Jack London Continuation High School and a Community Day School. Figure 2.3-1 shows a site plan of the existing facilities. The campus contains 53 buildings consisting of 28 permanent buildings and 25 portable classrooms providing a combined 77 classrooms with capacity to accommodate 2,714 students.[13] The existing buildings and structures on the campus are listed in Table 2.3-1.

The core campus is composed of one- and two-story permanent buildings clad in brick, dating to 1958 and 1959. The permanent buildings are located around a rectangular lawn, mostly in the northeast quadrant of the campus. They include classrooms, administration, library, gymnasium, food service/multipurpose room, operations and maintenance and a lunch shelter. Clusters of one-story portable buildings dating from 1935 to 1991 are located in the northwest and southeast corners of the campus. Other facilities include a garden plot in the northwest corner of the campus; a track and softball field on the west side; and an asphalt playground, tennis courts, and practice field south of the gym.

To provide additional capacity for the booming suburban population, portable buildings were added from 1959 to 1964 in the northwest corner of the school site. Additional permanent buildings were constructed in 1964. An additional phase of construction including installation of single unit modular portable buildings in the southwest corner of the campus occurred from 1987 to 1991. More recently, in and after year 2000, additional portable classrooms were added to the southeast corner of the campus, encroaching on the parking lot in this area of the campus.

[13] LAUSD, 2011. Ulysses S. Grant High School – Campus Pre-Planning Survey.

Mature trees and landscaping are located within the quad and around the perimeter of the campus. However, several mature trees with uplifting roots, causing damage to structures and posing a trip hazard, are located on campus.

Main entry to the campus is provided from Lancer Lane, located on the east side of the campus. Parking is available along the east side of Lancer Lane. School parking lots are located in the southeast corner with access from Hatteras Street, and in the northern part of the campus, along Oxnard Boulevard.

The existing buildings and structures on the campus are listed in Table 2.3-1.

Table 2.3-1
EXISTING BUILDINGS AND STRUCTURES

Building Number	Building Name/Location Description	Year Built	Building Type	Number of Stories	Square Feet
1	Classroom Building 200	1959	Permanent	2	48,023
2	Art Building	1959	Permanent	1	17,424
3	Utility Building	1959	Permanent	1	4,020
4	Industrial Arts Building	1959	Permanent	1	12,662
5	Physical Education Building	1959	Permanent	1	42,782
6	Two/Three Unit Relocatable	1947	Portable	1	1,824
7	Transformer Vault	1959	Permanent	1	1,196
8	Single Unit Relocatable	1965	Portable	1	880
9	Sanitary Relocatable Building	1965	Portable	1	888
10	Two/Three Unit Relocatable	1957	Portable	1	2,592
11	Two/Three Unit Relocatable	1961	Portable	1	2,970
12	Two/Three Unit Relocatable	1961	Portable	1	3,202
13	Two/Three Unit Relocatable	1959	Portable	1	1,877
14	Two/Three Unit Relocatable	1959	Portable	1	1,877
15	Two/Three Unit Relocatable	1959	Portable	1	1,877
16	Two/Three Unit Relocatable	1965	Portable	1	1,877
17	Two/Three Unit Relocatable	1965	Portable	1	1,877
18	Two/Three Unit Relocatable	1949	Portable	1	1,728
19	Two/Three Unit Relocatable	1949	Portable	1	1,728
20	Lath House	1959	Permanent	1	1,400
21	Greenhouse	1959	Permanent	1	160
22	Storage Unit 1	1968	Permanent	1	360
23	Agricultural Classroom Building	1959	Permanent	1	1,500
24	Storage Unit 2	1973	Permanent	1	360
25	Sanitary Building	1959	Permanent	1	1,512
26	Two/Three Unit Relocatable	1935	Portable	1	1,824

Building Number	Building Name/Location Description	Year Built	Building Type	Number of Stories	Square Feet
27	Industrial Arts Building	1959	Permanent	1	5,460
28	Sanitary Relocatable Building	1950	Portable	1	912
29	Library Building	1959	Permanent	1	7,958
30	Administrative Building	1959	Permanent	1	8,111
31	Multi-purpose Building	1959	Permanent	1	27,470
32	Classroom Building	1964	Permanent	2	6,518
33	Classroom Building	1964	Permanent	2	6,518
34	Classroom Building East	1958	Permanent	2	48,480
35	Single Unit Modular	1987	Portable	1	896
36	Single Unit Modular	1988	Portable	1	896
37	Single Unit Modular	1988	Portable	1	896
38	Single Unit Modular	1988	Portable	1	864
39	Storage Unit 3	1979	Permanent	1	360
40	Single Unit Modular	1991	Portable	1	864
41	Single Unit Modular	1991	Portable	1	864
42	Bleachers 1	1959	Permanent	1	3,300
43	Bleachers 2	1959	Permanent	1	3,300
44	Announcer's Booth	1959	Permanent	1	44
45	Electrical Equipment Room 1	1959	Permanent	1	194
46	Electrical Equipment Room 2	1959	Permanent	1	183
47	Single Classroom Relocatable	2000	Portable	1	960
48	Two Unit Modular	N/A	Portable	1	1920
49	Two Unit Modular	N/A	Portable	1	1920
50	Sanitary Building	N/A	Portable	1	480
51	Shade Structure	N/A	Permanent	1	200
52	Shade Structure	N/A	Permanent	1	937
53	Utility Building	N/A	Permanent	1	983
54	Bleachers	N/A	Permanent	1	5,325
55	Sanitary Building	N/A	Permanent	1	488
56	Storage	N/A	Permanent	1	224
57	Platform	N/A	Permanent	1	666
58	Platform	N/A	Permanent	1	584

Source: LAUSD, Ulysses S. Grant High School: Campus Pre-Planning Survey, 2011, and Ulysses S. Grant High School: Comprehensive Modernization Project – Final Space Program, April 3, 2017

2.4 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.[14] [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.[15] 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[16] 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.

2.5 Necessary Approvals

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

Responsible Agencies

- City of Los Angeles, Public Works Department. Permit for curb, gutter, and other offsite improvements
- City of Los Angeles, Fire Department. Approval of plans for emergency access and emergency evacuation
- City of Los Angeles, Department of Transportation. Approval of haul route

Reviewing Agencies

- South Coast Air Quality Management District. Approval of Construction Emission/Dust Control Plan, architectural coatings
- Los Angeles Regional Water Quality Control Board. Approval of water quality management plan
- State Water Resources Control Board Notice of Intent to obtain permit coverage. General Construction Permit regulates stormwater and non stormwater discharges associated with construction activities
- California Department of General Services, Division of State Architect (DSA). Approval of site-specific project construction drawings

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

15 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.

16 Government Code Section 53094.

3.0 PROJECT DESCRIPTION

3.1 Background

A campus-wide survey of the Grant High School campus found existing structures and mechanical systems to be outdated, requiring rehabilitation or modernization to meet current needs.

The proposed Project would address the deficiencies identified in the campus-wide survey through demolition of structures and systems that are beyond repair; construction of new buildings; improvements to the existing campus buildings and facilities; upgrades to infrastructure and utilities; and various upgrades to comply with the Americans with Disabilities Act (ADA:42 U.S. Code Chapter 126).

3.2 Proposed Project

As part of the SUP,[17] the District plans to implement a comprehensive modernization project at Grant High School. A campus-wide survey of the Grant High School campus found existing structures and mechanical systems to be outdated, requiring rehabilitation or modernization to meet current needs. The campus was originally constructed in 1959. To provide additional capacity for the booming suburban population, portable buildings were added from 1959 to 1964 in the northwest corner of the school site. Additional permanent buildings were constructed in 1964. An additional phase of construction in the southwest corner of the campus occurred from 1987 to 1991. More recently, additional portable classrooms were added to the southeast corner of the campus encroaching on parking lot in this area of the campus.

The proposed Project would address the deficiencies identified in the campus-wide survey through demolition of structures and systems that are beyond repair; construction of new buildings; improvements to the existing campus buildings and facilities; upgrades to infrastructure and utilities; and various upgrades to comply with the Americans with Disabilities Act (ADA:42 U.S. Code Chapter 126).

Figure 3.2-1
PROJECT VICINITY

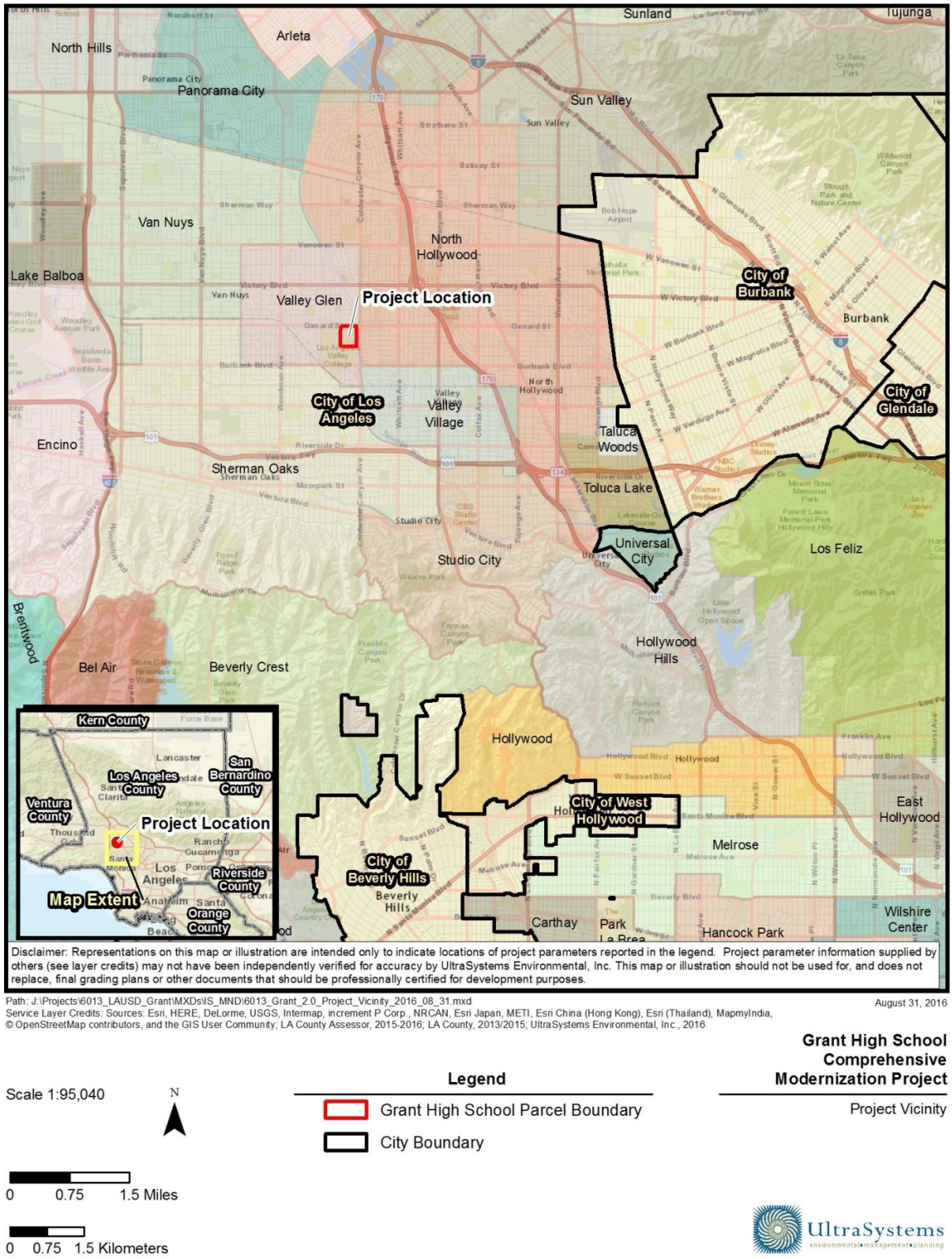
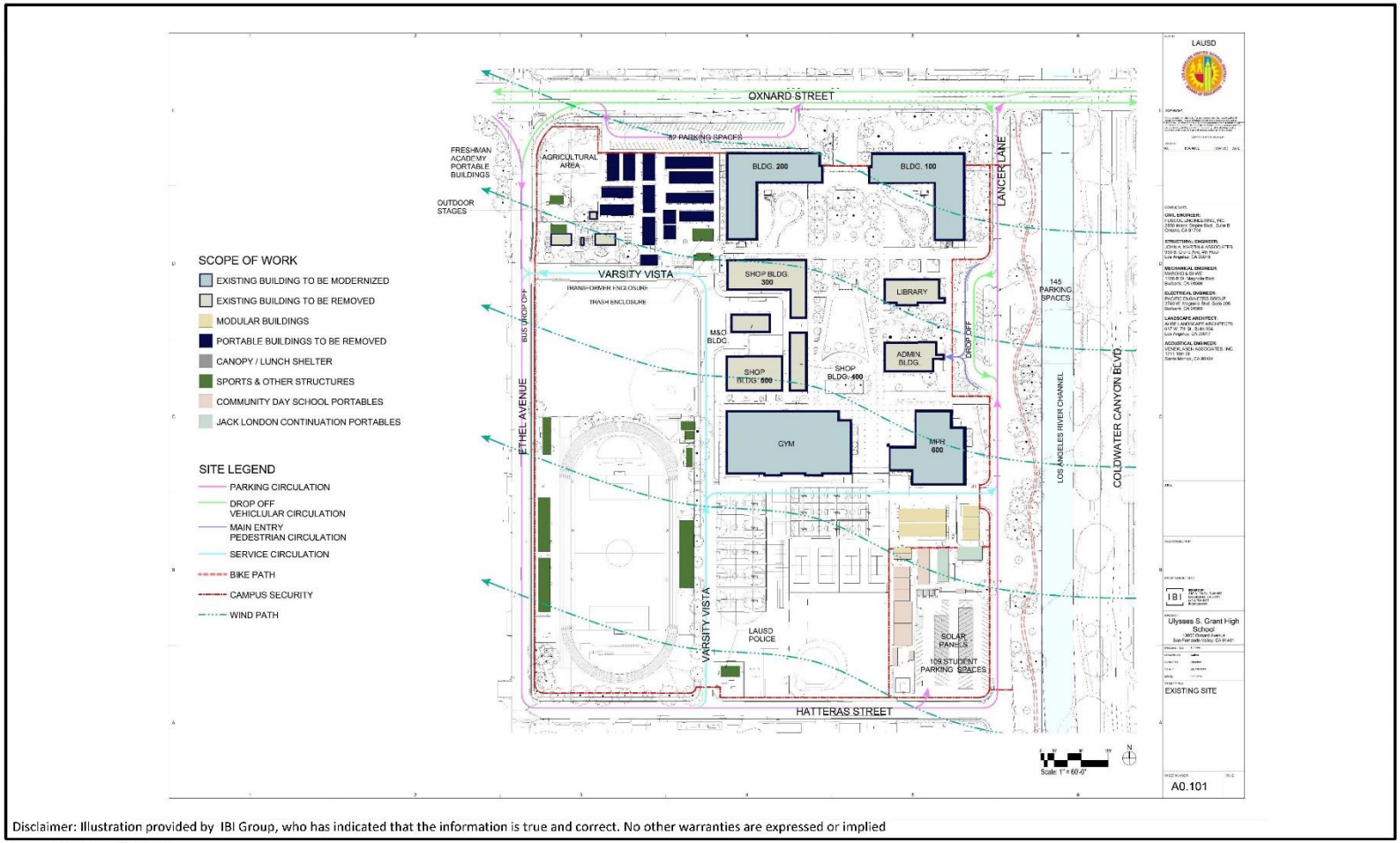


Figure 3.2-2
PROJECT LOCATION

Figure 3.2-3
EXISTING SITE PLAN



Disclaimer: Illustration provided by IBI Group, who has indicated that the information is true and correct. No other warranties are expressed or implied

Source: IBI Group. 09/15/16

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Grant High School
Comprehensive Modernization Project
Existing Site

3.2.1 Planned Improvements

Figure 3.2-4 shows a site plan of the Project improvements. Table 3.2-1 and Table 3.2-2 summarize the planned improvements to the campus. Each activity is described in greater detail following the table.

Table 3.2-1
OVERVIEW OF PROJECT IMPROVEMENTS

Activity	Number of Classrooms	Square Footage
Demolition	(41)	(87,298)
New	31	89,760
Remodeled	48	142,081
Existing /No Change	14	58,880
TOTAL POST PROJECT	**93**	**290,721**
TOTAL (LOST) / GAINED	**(8)**	**2,462**

Source: Final Space Program April 3, 2017

Figure 3.2-4
PROPOSED SITE

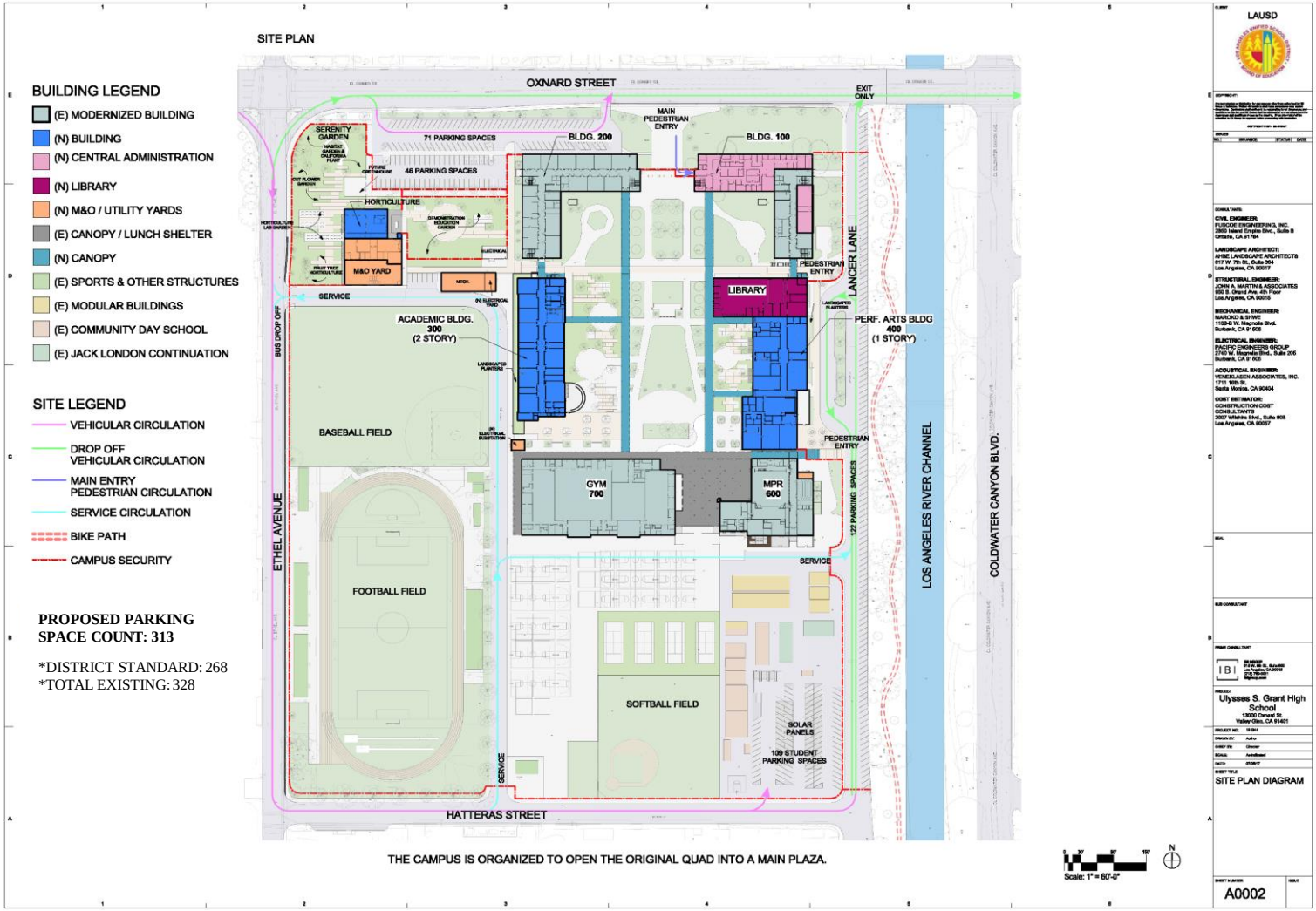

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Table 3.2-2
SUMMARY OF PROJECT IMPROVEMENTS

Building Number	Building Name/Location Description	Demolition Square Feet	Modernization Square Feet	New Square Feet	Existing (No Change) Square Feet
1	Classroom Building West		48,023		
2	Art Building	17,424			
3	Utility Building	4,020			
4	Industrial Arts Building	12,662			
5	Physical Education Building		24,581		18,201
6	Two/Three Unit Relocatable	1,824			
7	Transformer Vault	1,196			
8	Single Unit Relocatable	880			
9	Sanitary Relocatable Building	888			
10	Two/Three Unit Relocatable	2,592			
11	Two/Three Unit Relocatable	2,970			
12	Two/Three Unit Relocatable	3,202			
13	Two/Three Unit Relocatable	1,877			
14	Two/Three Unit Relocatable	1,877			
15	Two/Three Unit Relocatable	1,877			
16	Two/Three Unit Relocatable	1,877			
17	Two/Three Unit Relocatable	1,877			
18	Two/Three Unit Relocatable	1,728			
19	Two/Three Unit Relocatable	1,728			
20	Lath House	1,400			
21	Greenhouse	160			
22	Storage Unit 1				360
23	Agricultural Classroom Building	1,500			
24	Storage Unit 2				360
25	Sanitary Building				1,512
27	Industrial Arts Building	5,460			
28	Sanitary Relocatable Building				912
29	Library Building	7,958			
30	Administrative Building	8,111			
31	Multi-purpose Building		20,997		6,473
32	Classroom Building				6,518
33	Classroom Building				6,518

Building Number	Building Name/Location Description	Demolition Square Feet	Modernization Square Feet	New Square Feet	Existing (No Change) Square Feet
34	New Central Administration / Health Unit / Career Center / School Police (Existing Classroom Building East)		48,480		
35	Single Unit Modular				896
36	Single Unit Modular				896
37	Single Unit Modular				896
39	Storage Unit 3				360
42	Bleachers 1				3,300
43	Bleachers 2				3,300
44	Announcer's Booth				44
45	Electrical Equipment Room 1				194
46	Electrical Equipment Room 2				183
47	Single Classroom Relocatable	960			
52	Shade Structure				937
53	Utility Building				983
54	Bleachers				5,325
55	Sanitary Building				488
56	Storage				224
57	Platform	666			
58	Platform	584			
	Two Story Science Building			41,641	
	Library/Performing Arts Building			39,073	
	Building 500 Agriculture/M&O			9,046	
TOTAL		**87,298**	**142,081**	**89,760**	**58,880**

Source: LAUSD, Ulysses S. Grant High School: Comprehensive Modernization Project – Final Space Program, April 3, 2017.

3.2.1.1 Demolition

The Project would include demolition of 12 existing permanent buildings and structures totaling approximately 61,141 square feet of floor space and demolition/removal of 14 portable buildings containing approximately 26,157 square feet of classroom space, for a total demolition/removal of approximately 87,298 square feet. The Project also includes the remodeling of approximately 142,081 square feet of existing building space.

Facilities to be removed include the following:

- Administration building
- Library building
- Arts building
- Two industrial arts classroom buildings

- Agricultural/horticultural classroom building and auxiliary structures
- Utility/Support buildings and structures
- Approximately 22 classrooms located in relocatable buildings

Figure 3.2-3 shows stationary and portable buildings that would be removed by the Project.

3.2.1.2 New Construction and Renovations

As shown in Figure 3.2-3, in the northwest corner of the Project site, the existing portable buildings will be replaced with a new multi-purpose field and the agricultural and Maintenance and Operations buildings. The existing buildings in the middle of the main quad will be replaced with new buildings, organizing the quad into a main plaza for the Project site. Administrative uses will be moved to the renovated Building #100, placing these uses at the main entrance to the campus.

New Construction
The following new structures would be built to current code requirements and LAUSD design standards:

- Approximately 31 general, agricultural, science and specialty classrooms, and support spaces.
- Library building.
- Maintenance and Operations (M&O) building.

Modernization and Renovations

The Project would include modernization and/or upgrades to the following facilities:

- Approximately 49 general, science and specialty classrooms, and support spaces.
- Classroom building (#100) renovated to include new uses: Central Administration, Health Unit, Career Center, and School Police. Also, seismic retrofit, and electrical and heating, ventilation, and air conditioning (HVAC) systems upgrade,
- Classroom building (#200): seismic retrofit, and electrical and HVAC systems upgrade,
- Gymnasium: seismic retrofit, HVAC and fire alarm systems upgrade, modernization of multiple existing uses,
- Multi-purpose building: seismic retrofit, HVAC system upgrade, and modernization of multiple existing uses including Grant Hall,
- Agricultural/horticultural area: landscape and utility improvements.

3.2.1.3 Site Upgrades

The Project would also include the following site upgrades:

- Upgrades to site-wide infrastructure, including sanitary sewer, water, and electrical utilities;
- Various site-wide upgrades to remove identified and prioritized barriers to program accessibility per the ADA (42 U.S. Code Chapter 126), and;
- Upgrades to landscape, hardscape, and exterior paint.

3.2.1.4 Updates for Regulatory Compliance

The Project includes various actions to ensure that Grant High School complies with federal, state and local statutory and regulatory requirements. These include improvements required by the ADA (42 U.S. Code Chapter 126), California Department of General Services, Division of the State Architect, Department of Toxic Substances Control, Office of the Independent Monitor, and SCs of the Program EIR.[18]

3.2.2 Site Access, Circulation, and Parking

The Project would result in reconfiguration of some of the access points throughout the campus. Currently, Lancer Lane provides two-way traffic circulation with limited access from Oxnard Street. Access is restricted to inbound and outbound right turns. However, existing traffic currently makes illegal inbound and outbound left-turns, which presents a safety hazard due to the proximity of the intersection to Coldwater Canyon Boulevard. Lancer Lane will be reconfigured for northbound traffic only, with outbound right-turns permitted onto Oxnard Street. In addition, an internal vehicular right-of-way would be provided through the center of the campus, in a counter-clockwise direction to allow for emergency vehicle access. All other existing driveways and parking lots would remain in place.

Vehicular access and parking would be designed to comply with Section 2.3, Vehicular Access and Parking of the School Design Guide, January 2014. District Standards indicate 268 spaces are required. The campus currently has 328 spaces, which will decrease to 313 spaces with the proposed Project. The Design Guide contains the following regulations related to traffic:

- Parking Space Requirements[19]
- General Parking Guidelines[20]
- Vehicular Access and Pedestrian Safety[21]
- Parking Structure Security[22]

3.3 Landscaping

Project landscaping will be designed to be compatible with the campus and to incorporate, to the extent possible, native plants and vegetation that are appropriate for the campus and the Southern California setting. All plants and vegetation proposed for the campus will be selected from the District's approved plant list or will be approved by the District prior to being placed on the campus.

3.4 Site Security and Safety

Currently, the Grant High School campus is mostly secured by fencing along the boundaries. Following the Project, the campus would remain secured, with the majority of the campus being fenced or gated. The Project may install additional fences surrounding new parking lots. Additionally, security lighting would be installed throughout the campus to alleviate safety concerns.

[18] LAUSD. 2015. Program EIR for the School Upgrade Program. Available at: http://achieve.lausd.net/ceqa.
[19] Page 79 School Design Guide. Los Angeles Unified School District. October 2016.
[20] Page 79 Ibid.
[21] Page 81 Ibid.
[22] Page 82 Ibid.

The LASPD is the primary provider of police protection to District schools, providing security to schools within its jurisdiction.[23] 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.

3.5 Sustainability Features

The Project's new buildings and structures would be designed to reduce energy use below current levels by incorporating modernized and energy-efficient features, which may include lighting, windows, electrical transformers, building insulation, or installation of irrigation smart controllers, etc. All new construction would at a minimum exceed by 10 percent or more the energy efficiency standards under California Title 24, Part 6 energy efficiency standards consistent with LAUSD SC-GHG-5.

3.6 Construction Phasing

Due diligence activities are underway and are expected to be completed in the third quarter of 2018. The Project's construction duration is yet to be determined, but is expected to be three to five years. However, for the purpose of the air quality and noise analyses, the entire demolition, construction, and modernization activities was assumed to take approximately 36 months (two 18-month sequential phases). Table 3.6-1 shows the types and number of pieces of equipment to be used in each 18-month phase. Because of active school operation, less than five acres (contiguous) in each location on campus would be disturbed at any one time. Any soil that is imported or exported must be chemically tested in accordance with specific written procedures as outlined in LAUSD Specifications, Section 01 4524, *Environmental Import/Export Materials Testing*.[24] This section specifies the requirements for the sampling, testing, transportation, and certification of imported fill materials or exported fill materials from school sites. Onsite concrete and asphalt crushing would not occur on campus. Non-hazardous debris and soil would be exported to appropriate facilities.

Table 3.6-1
Construction Schedule and Equipment

Phase 1 & 2	Schedule*	Equipment	Maximum Number per Day
Demolition; Interim Student Housing; Modernization** (i.e., Building Interiors)	2 months	Air Compressors	2
		Crushing/Processing Equipment	1
		Excavators	1
		Off-Highway (Water) Trucks	1
		Rubber Tired Loaders	1
		Skid Steer Loaders	1

[23] LAUSD SUP Final EIR, September 2015.
[24] LAUSD Asset Management, Guide Specifications: Division 01 General Requirements, Section 01 4524, Environmental Import/Export Materials Testing. October 1, 2011.

Table 3.6-1
Construction Schedule and Equipment

Phase 1 & 2	Schedule*	Equipment	Maximum Number per Day
Site Preparation & Modernization**	2 months	Excavators	1
		Off-Highway (Water) Trucks	1
		Plate Compactors	1
		Rollers	2
		Rubber Tired Loaders	1
		Tractors/Loaders/Backhoes	1
		Trenchers	1
Building Construction & Modernization**	12 Months	Air Compressors	1
		Bore/Drill Rigs	1
		Cranes	1
		Fork Lifts	4
		Pumps	1
		Tractors/Loaders/Backhoes	2
Asphalt Paving; Off-Campus Street Work	2 months	Off-Highway (Water) Trucks	1
		Paving Equipment	2
		Rollers	2
		Rubber Tired Loaders	2

*Approximate dates provide the most conservative schedule. These dates are subject to change at LAUSD's discretion or as a result of unforeseen circumstances.
** Interior upgrades would be completed over summer recess and when students are not on campus.

4.0 ENVIRONMENTAL CHECKLIST AND ANALYSIS

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

DETERMINATION

On the basis of this initial evaluation:

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

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

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

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

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

SIGNATURE	**DATE**
PRINTED NAME	**TITLE**

EVALUATION OF ENVIRONMENTAL IMPACTS:

1) A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the Project will not expose sensitive receptors to pollutants based on a project-specific screening analysis).
2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less that significant with mitigation incorporated, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.
4) "Negative Declaration: 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 Section XVII, "Earlier Analysis," cross referenced).
5) Earlier analysis must be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR, or negative declaration. 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 which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated
7) Supporting Information Sources: A sources list should be attached, and other sources used or individuals contacted should be cited in the discussion.
8) The explanation of each issue should identify:
    a) The significance criteria or threshold, if any, used to evaluate each question; and
    b) The mitigation measure identified, if any, to reduce the impact to less than significance.

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?	☐	☐	☒	☐

4.1.1 Summary of Impacts

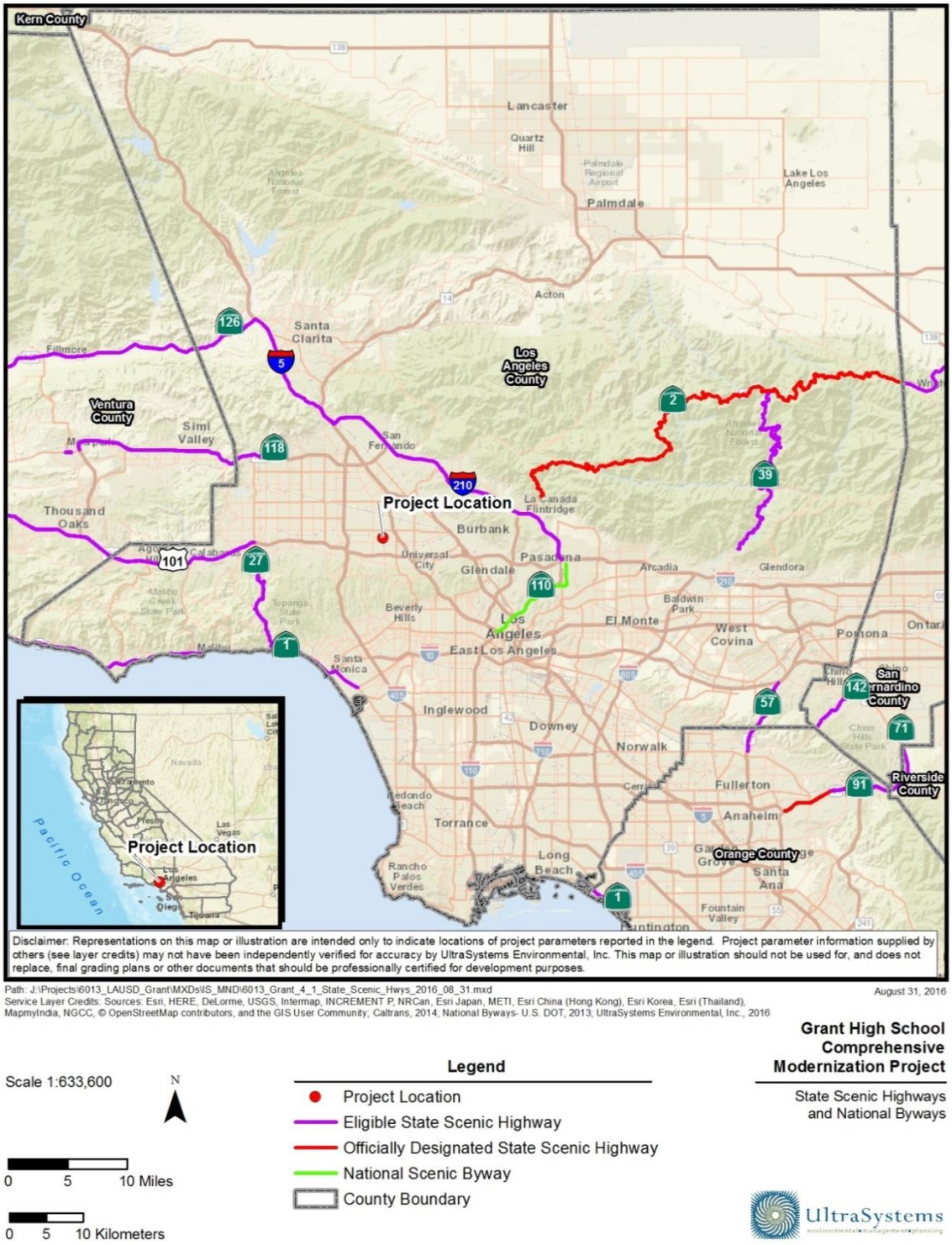
The Program EIR evaluated the potential for implementation of SUP-related projects to impact aesthetic and visual resources. The Program EIR includes SCs for minimizing impacts on aesthetics and visual quality of the existing environment in areas where future projects would be implemented under the SUP. Applicable SCs related to aesthetic and visual resources impacts associated with the Project are provided in Table 4.1-1 and Section 8.

Table 4.1-1
AESTHETIC AND VISUAL RESOURCES STANDARD CONDITIONS OF APPROVAL

Applicable SCs	Description
SC-AE-2	**School Design Guide.** This document outlines measures to reduce aesthetic impacts around schools, such as shrubs and ground treatments that deter taggers, vandal-resistant and graffiti-resistant materials, painting, etc.
SC-AE-3	LAUSD shall assess a proposed project's consistency with the general character of the surrounding neighborhood, including any proposed changes to the density, height, bulk, and setback of new building (including stadium), addition, or renovation. Where feasible, LAUSD shall make appropriate design changes to reduce or eliminate viewshed obstruction and degradation of neighborhood character. Such design changes could include, but are not limited to, changes to campus layout, height of buildings, landscaping, and/or the architectural style of buildings.
SC-AE-6	**School Design Guide**. This document outlines requirements for lighting and measures to minimize glare for pedestrians, drivers and sports teams, and to avoid light spilling onto adjacent properties.
SC-AE-7	LAUSD shall reduce the lighting intensity from the new sources on adjacent residences to no more than two foot-candles, measured at the residential property line. LAUSD shall utilize hoods, filtering louvers, glare shields, and/or landscaping as necessary to achieve the standard. The lamp enclosures and poles shall also be painted to reduce reflection. Following installation of lights, the lighting contractor shall review and adjust lights to ensure the standard is met.
SC-AE-8	Design site lighting and select lighting styles and technologies to have minimal impact off-site and minimal contribution to sky glow. Minimize outdoor lighting of architectural and landscape features and design interior lighting to minimize trespass outside from the interior. International Dark-Sky Association (IDA) and the Illuminating Engineering Society (IES) Model Lighting Ordinance (MLO) shall be used a guide for environmentally responsible outdoor lighting. The MLO outdoor lighting has outdoor lighting standards that reduce glare, light trespass, and skyglow. The Joint IDA-IESNA Model Outdoor Lighting Ordinance (MLO) uses lighting zones (LZ0-4) which allow the District to vary the stringency of lighting restrictions according to the sensitivity

Applicable SCs	Description
	of the area as well as consideration for the community. The MLO also incorporates the Backlight-Uplight-Glare (BUG) rating system for luminaires, which provides more effective control of unwanted light. IDA-IESNA Model establishes standards to: • Limit the amount of light that can be used. • Minimize glare by controlling the amount of light that tends to create glare. • Minimize sky glow by controlling the amount of uplight. • Minimize the amount of off-site impacts or light trespass.

Figure 4.1-1
SCENIC HIGHWAYS AND BYWAYS



4.1.2 Impact Analysis

a) Would the project have a substantial adverse effect on a scenic vista?

Less Than Significant Impact. The Project site is located in Valley Glen, in the southeast San Fernando Valley, which is defined by broad, flat valleys developed with suburban land uses. Scenic resources visible from the Project area include the peaks of the San Gabriel Mountains, located approximately 10 miles northeast of the site, and the Santa Monica Mountains located approximately 2.5 miles south of the site.

Public views which incorporate the Project site are available from the surface streets surrounding Grant High School, including Oxnard Street, Lancer Avenue, Hatteras Street, and Ethel Avenue. In general, views from these streets are of the built environment adjacent to the roadways; however, distant views of the area's topography (i.e., the hillsides and peaks) are available above the built environment. The elevation change along these roadways is not great enough to afford panoramic views to the central San Fernando Valley. Private views in the Project vicinity, including the residential, school, and commercial uses, are similar to public views, but are more restricted by landscaping and existing structures. Modification of existing buildings and construction of new buildings would be designed to complement the existing character and quality of site surroundings. Under the proposed Project, new and updated buildings would be compatible with the general character, massing, and color of existing buildings on campus and the surrounding neighborhood in terms of architectural style, density, height, bulk, and setback. The Project would occupy a similar visual field as the current conditions and would not significantly impact existing street views or other scenic vistas in the surrounding area. Therefore, the Project would not represent a notable departure in terms of views into and across the Project site.

The Program EIR identifies select scenic vistas and aesthetic features within the District, including the San Gabriel Mountains and the Santa Monica Mountains. Views of the San Gabriel Mountains and the Santa Monica Mountains would continue to be available from public and private vantage points around the Project's proposed new and modified structures. The vistas available from the campus would not be affected by the proposed Project, as the new buildings would be similar heights and located in roughly the same location as the existing buildings. Public views from the areas around the Project site would also remain substantially similar to current conditions. The Project would not significantly impact views of the San Gabriel Mountains and the Santa Monica Mountains, as it would occupy roughly the same visual field as the current conditions.

The Project would incorporate the LAUSD School Design Guide into the site design and construction for protection of unique scenic features and designated scenic vistas. In addition, implementation of SC-AE-3 requires LAUSD to ensure that the Project design and construction are compatible with the existing character of the campus and surrounding area. Therefore, the Project would have a less than significant impact on scenic vistas. No mitigation measures or further evaluation are required.

b) Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

No Impact. The Project is not located near (within 0.25 mile) a State-designated scenic highway, a highway with scenic priority identified in the Los Angeles County General Plan, a nationally designated Scenic Byway Historic Parkway, or a Californian Historic Parkway.[25] Figure 4.1-1 shows officially designated and eligible scenic highways located in Los Angeles County. The nearest State-designated scenic highways are: Interstate 210 - Foothill Freeway, an eligible but not officially designated State scenic highway, located approximately seven

[25] Caltrans. State Scenic Highways Map, Los Angeles County. www.dot.ca.gov/hq/LandArch/16_livability/scenic_highways/. Accessed January 20, 2017

miles northeast of the Project, and State Route 2 - Angeles Crest Highway, an officially designated State scenic highway located approximately 13 miles northeast of the Project. The nearest officially designated National Byway Historic Parkway and Californian Historic Parkway is Arroyo Seco Historic Parkway - Route 110, located approximately 14 miles east of the Project. Due to distance and intervening topography and structures, the Project site would not be visible to drivers on any of the State-designated scenic highways, highways with scenic priority identified in the Los Angeles County General Plan, nationally designated Scenic Byway Historic Parkways, or Californian Historic Parkways located in Los Angeles County and therefore, no impacts to scenic highways would occur.

As discussed in Section 4.5, the Grant High School campus comprises buildings and structures that have many of the typical character-defining features of postwar LAUSD schools. However, taken as a whole, the campus is a common but not outstanding exemplification of postwar LAUSD design ideas. The campus and its buildings are not an outstanding or distinctive example of architectural design and are not considered historically significant.[26] No mitigation measures or further evaluation are required.

c) Would the project substantially degrade the existing visual character or quality of the site and its surroundings?

Less than Significant Impact. The overall visual character in the Project area is urban in nature and is characterized by residential and commercial land uses. Existing buildings are low in height, predominantly one- to three-story structures. Major arterials are flanked by low- to medium-density single-family and multi-family residual units. In the areas between arterial streets, narrower residential streets allow for low- to medium-density neighborhoods generally composed of detached, single-family residences. Existing buildings in the area are mostly modern in architectural style. Streets and sidewalks are lined with utility poles, street lights, trees and ornamental vegetation. On the eastern border of the campus an existing green belt parallels Lancer Lane. The green belt is immediately adjacent to the concrete lined Los Angeles River bed.

Implementation of the proposed Project would not degrade the existing visual character of the site. As discussed in response to Checklist Question a)**,** under the proposed Project, new and renovated buildings would be consistent with the general character of existing buildings on campus and the surrounding neighborhood in terms of architectural style, density, height, bulk, and setback. The Project would further entail construction of improved facilities with architecture designs that will complement the architectural style of existing buildings located on campus. The Project would improve the existing infrastructure, circulation and parking facilities on campus, thereby resulting in a beneficial change to existing site conditions and would not represent degradation of the visual character of the surrounding community.

The new buildings would be similar in height and located in roughly the same location as the existing buildings. The new buildings, lighting, and supporting landscape features would be complementary to the existing character of the school, as well as the surrounding neighborhood. The modernized existing buildings would also be an improvement over current visual conditions, with upgraded landscaping, lighting, and access for the students, faculty, staff, and the community. The new and modernized buildings, internal circulation improvements, and new parking facilities would be a beneficial change to the current site conditions and would not represent degradation in visual character of the surrounding community.

During Project construction, there would be elements on the Project site that are not compatible with the Project vicinity or the campus. These features may include construction equipment (e.g., small cranes, pickup trucks), stockpiled materials, and construction-area barriers and fencing. Construction elements would be inconsistent with the visual character of the Project vicinity. While these elements would be removed following

[26] LAUSD Historic Resources Survey Report. June, 2014.

construction, they would nonetheless result in a temporary impact. However, during Project construction, work areas would be screened from public view and from the students of Grant High School through the use of temporary barriers.

The Project would incorporate measures from the LAUSD School Design Guide to protect the character and quality of site and its surroundings. SC-AE-2 requires LAUSD to install measures such as the use of shrubs and ground treatments to discourage graffiti and accumulation of rubbish and debris along campus walls adjacent to public rights-of way. SC-AE-3 requires LAUSD to assess the Project's consistency with the general character of the surrounding neighborhood, including any proposed changes to the density, height, bulk, and setback (of new building, addition, or renovation), and make appropriate design changes to reduce or eliminate Project impacts related to degradation of existing neighborhood character.

Shadow-sensitive uses include all residential uses and routinely usable outdoor spaces associated with recreational or institutional uses (e.g., schools), commercial uses such as pedestrian-oriented outdoor spaces or restaurants with outdoor eating areas, nurseries, and existing solar collectors.[27] These uses are considered sensitive because sunlight is important to function, physical comfort, or commerce. Shade sensitive uses in the Project vicinity are limited to the adjacent college and surrounding residences. Following Project construction, impacts associated with shade and shadows would be virtually the same as existing conditions, since the new and updated buildings would be similar in bulk and height to the existing buildings located on site and shadows would not extend off-site in such a manner as to significantly impact nearby sensitive residential uses. Therefore, impacts from shadows as a result of the Project would be less than significant. With implementation of SC-AE-2 and SC-AE-3, Project impacts on visual character or visual quality of the site and its surroundings would be less than significant. No mitigation measures or further evaluation are required.

d) Would the project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

Less than Significant Impact. The Project site is located in Valley Glen, which is characterized by low to medium nighttime ambient light levels. Artificial lighting is currently used on campus and in the surrounding area for security, parking, signage, architectural highlighting, landscaping, and decorative purposes. Street lights and traffic on local streets also contribute to the ambient light levels in the area. In addition, athletic fields at the Grant High School and at the adjacent Los Angeles Valley College are illuminated at night for games. Light sensitive uses in the Project vicinity are limited to the adjacent college and surrounding residences.

The Project proposes new security lighting elements throughout the campus and parking lots. Installation of updated lighting would help improve safety and visibility throughout the campus. The Project lighting would include new and reconfigured lighting for security, parking, signage, architectural highlighting, landscaping, and decorative purposes. Some of this new lighting may be visible from the surrounding area. Therefore, the Project's proposed lighting is expected to contribute to ambient nighttime illumination in the Project vicinity.

The Project would comply with the requirements of the California Building Code (CBC), which contains standards for outdoor lighting that are intended to reduce light pollution and glare by regulating light power and brightness, shielding, and sensor controls. Additionally, implementation of SC-AE-6, SC-AE-7, and SC-AE-8 would require LAUSD to comply with requirements for lighting, included in the LAUSD School Design Guide and incorporate measures to minimize glare for pedestrians, drivers, and sports teams; including lighting

[27] LAUSD OEHS. November 2015. Initial Study/Mitigated Negative Declaration for the Olive Vista Middle School Seismic Modernization Project. http://achieve.lausd.net/cms/lib08/CA01000043/Centricity/domain/135/pdf%20files/Olive_Vista_MS_Final_IS_MND.pdf. Adopted by the Board of Education on June 21, 2016.

design features such as hoods, filtering louvers, and glare shields to reduce the potential for light spillover to adjacent properties; use lighting styles and technologies to minimize contribution to sky glow; minimize outdoor lighting of architectural and landscape features; minimize interior lighting to trespass outside from the interior; and use International Dark-Sky Association (IDA) and the Illuminating Engineering Society (IES) Model Lighting Ordinance (MLO) as a guide for environmentally responsible outdoor lighting, thereby reducing glare, light trespass, and skyglow, effectively controlling unwanted light.

With implementation of SC-AE-6, SC-AE-7, and SC-AE-8, impacts with respect to light and glare would be less than significant. No mitigation measures or further evaluation are required.

4.2 Agriculture and Forestry 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?	☐	☐	☐	☒

4.2.1 Summary of Impacts

The Program EIR evaluated the potential for implementation of SUP-related site-specific projects to impact agriculture and forestry resources. LAUSD is urbanized with only small areas of scattered important farmland and no land protected under Williamson Act contract, and no forest land or timberland. Therefore, projects implemented under the SUP would have no impacts on agricultural and forestry resources. As no potential significant impacts on agricultural and forestry resources were identified in the Program EIR, the Program EIR does not include SCs for agricultural and/or forestry resources.

Similarly, Project specific-analysis provided in Section 4.2.2, concludes that implementation of the proposed Project would have no impacts on agriculture or forestry lands in the Project area.

4.2.2 Impact Analysis

a) Would the project 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?

No Impact. The Grant High School campus is located within a developed urban area and is not mapped as Prime or Unique Farmland, or Farmland of Statewide Importance on the California Important Farmland Finder maintained by the Farmland Mapping and Monitoring Program.[28] No Williamson Act Contracts affect

[28] Division of Land Resource Protection (DLRP). California Important Farmland Finder. http://maps.conservation.ca.gov/ciff/ciff.html.

land within or near the Grant High School campus.[29] No forest land or timberland is located within or near the school campus.[30]

The Project would be constructed entirely within the existing campus boundary. No agricultural uses or related operations are present within the Project site or in the surrounding area.[31] Therefore, the Project would have no impacts on Prime Farmland, Unique Farmland, or Farmland of Statewide Importance pursuant to the Farmland Mapping and Monitoring Program. No mitigation measures or further evaluation are required.

b) Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?

No Impact. The Project site is currently zoned as Public Facilities (PF), and the City of Los Angeles General Plan land use designation is also Public Facilities.[32] The Project would be constructed entirely within the existing Grant High School campus. There are no Williamson Act Contracts that affect land in the LAUSD or land within or near Grant High School.[33] Therefore, the Project would not conflict with existing zoning for agricultural use or a Williamson Act contract. No impact would occur. No mitigation measures or further evaluation are required.

c) Would the project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code § 12220(g)), timberland (as defined by Public Resources Codes § 4526), or timberland zoned Timberland Production (as defined by Government Code § 51104(g))?

No Impact. The Project site is zoned as PF. No forest land or timberland zoning is present on site or in the surrounding area.[34] Therefore, the Project would not conflict with existing zoning for forest land or timberland. No impact would occur. No mitigation measures or further evaluation are required.

d) Would the project result in the loss of forest land or conversion of forest land to non-forest use?

No Impact. The proposed Project is located on an existing school campus, and no forest land exists on the Project site. Therefore, the Project would not result in the loss of forest land or conversion of forest land to non-forest use. No impact would occur. No mitigation measures or further evaluation are required.

e) Would the project 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?

No Impact. No farmland or forest land uses or related operations are on or near the Project site.[35] Therefore, the Project would not result in the conversion of farmland or forest land to other uses, either directly or

29 California Department of Conservation. Land Conservation Act Maps. Los Angeles County Williamson Act FY 2015/2016. ftp://ftp.consrv.ca.gov/pub/dlrp/wa/LA_15_16_WA.pdf.
30 City of Los Angeles. Zone Information and Map Access System (ZIMAS). http://zimas.lacity.org/.
31 City of Los Angeles. Zone Information and Map Access System (ZIMAS). http://zimas.lacity.org/.
32 City of Los Angeles, Zone Information and Map Access System (ZIMAS). Internet URL: http://zimas.lacity.org/
33 California Department of Conservation. Land Conservation Act Maps. Los Angeles County Williamson Act FY 2015/2016. ftp://ftp.consrv.ca.gov/pub/dlrp/wa/LA_15_16_WA.pdf.
34 City of Los Angeles. Zone Information and Map Access System (ZIMAS). http://zimas.lacity.org/
35 City of Los Angeles. Zone Information and Map Access System (ZIMAS). http://zimas.lacity.org/

indirectly. No impacts to farmlands or forest lands would occur. No mitigation measures or further evaluation are required.

4.3 Air Quality

The following analysis of potential air quality impacts is based on the findings from the Air Quality Technical Memorandum 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?	☐	☐	☒	☐
f) Would the project expose sensitive receptors in proximity to freeways and major roadways to substantial pollutant concentrations?	☐	☐	☒	☐

4.3.1 Summary of Impacts

This air quality impact analysis is based upon the air quality technical study prepared for the proposed Project (Appendix A). The Program EIR evaluated the potential for implementation of the SUP-related site-specific projects to result in adverse air quality impacts in the District and to students and faculty at the upgraded school sites.

The Program EIR includes SCs for minimizing impacts on air quality in areas where future projects would be implemented under the SUP. Applicable SCs related to Project-specific air quality impacts are provided in Table 4.3-1 and in Section 8. These include SCs for minimizing potential Project-specific impacts related to air quality.

Table 4.3-1
AIR QUALITY STANDARD CONDITIONS OF APPROVAL

Applicable SCs	Description
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.

Applicable SCs	Description
SC-AQ-3	LAUSD's construction contractor shall: • Maintain slow speeds with all vehicles. • Load impacted soil directly into transportation trucks to minimize soil handling. • Water/mist soil as it is being excavated and loaded onto the transportation trucks. • Water/mist and/or apply surfactants to soil placed in transportation trucks prior to exiting the site. • Minimize soil drop height into transportation trucks or stockpiles during dumping. • During transport, cover or enclose trucks transporting soils, increase freeboard requirements, and repair trucks exhibiting spillage due to leaks. • Cover the bottom of the excavated area with polyethylene sheeting when work is not being performed. • Place stockpiled soil on polyethylene sheeting and cover with similar material. • Place stockpiled soil in areas shielded from prevailing winds.
SC-AQ-4	LAUSD shall prepare an air quality assessment: If site-specific review of a school construction project identifies potentially significant adverse regional and localized construction air quality impacts, then LAUSD shall implement all feasible measures to reduce air emissions below the South Coast Air Quality Management District's (SCAQMD) regional and localized significance thresholds. LAUSD shall mandate that construction bid contracts include the measures identified in the air quality assessment. Measures shall reduce construction emissions during high-emission construction phases from vehicles and other fuel driven construction engines, activities that generate fugitive dust, and surface coating operations. Specific air emission reduction measures include, but are not limited to, the following: <u>Exhaust Emissions</u> • Schedule construction activities that affect traffic flow to off-peak hours (e.g. between 10:00 AM and 3:00 PM). • Consolidate truck deliveries and/or limit the number of haul trips per day. • Route construction trucks off congested streets. • Employ high pressure fuel injection systems or engine timing retardation. • Utilize ultra-low sulfur diesel fuel, containing 15 ppm sulfur or less (ULSD) in all diesel construction equipment. • Use construction equipment rated by the United States Environmental Protection Agency as having Tier 3 (model year 2006 or newer) or Tier 4 (model year 2008 or newer) emission limits for engines between 50 and 750 horsepower. • Restrict non-essential diesel engine idle time, to not more than five consecutive minutes. • Utilize electrical power rather than internal combustion engine power generators as soon as feasible during construction. • Utilize electric or alternatively fueled equipment, if feasible. • Utilize construction equipment with the minimum practical engine size. • Utilize low-emission on-road construction fleet vehicles. • Ensure construction equipment is properly serviced and maintained to the manufacturer's standards.

Applicable SCs	Description
	Fugitive Dust • Apply non-toxic soil stabilizers according to manufacturers' specification to all inactive construction areas (previously graded areas inactive for ten days or more). • Replace ground cover in disturbed areas as quickly as possible. • Sweep streets at the end of the day if visible soil material is carried onto adjacent public paved roads (recommend water sweepers with reclaimed water). • Install wheel washers where vehicles enter and exit unpaved roads onto paved roads, or wash off trucks and any equipment leaving the site each trip. • Pave construction roads that have a traffic volume of more than 50 daily trips by construction equipment, and/or 150 daily trips for all vehicles. • Pave all construction access roads for at least 100 feet from the main road to the project site. • Water the disturbed areas of the active construction site at least three times per day, except during periods of rainfall. • Enclose, cover, water twice daily, or apply non-toxic soil binders according to manufacturers' specifications to exposed piles (i.e., gravel, dirt, and sand) with a five percent or greater silt content. • Suspend all excavating and grading operations when wind speeds (as instantaneous gusts) exceed 25 miles per hour (mph). • Apply water at least three times daily, except during periods of rainfall, to all unpaved road surfaces. • Limit traffic speeds on unpaved roads to 15 mph or less. • Prohibit high emission causing fugitive dust activities on days where violations of the ambient air quality standard have been forecast by SCAQMD. • Tarp and/or maintain a minimum of 24 inches of freeboard on trucks hauling dirt, sand, soil, or other loose materials. • Limit the amount of daily soil and/or demolition debris loaded and hauled per day. General Construction • Utilize ultra-low VOC or zero-VOC surface coatings. • Phase construction activities to minimize maximum daily emissions. • Configure construction parking to minimize traffic interference. • Provide temporary traffic control during construction activities to improve traffic flow (e.g., flag person). • Develop a trip reduction plan for construction employees. • Implement a shuttle service to and from retail services and food establishments during lunch hours. • Increase distance between emission sources to reduce near-field emission impacts. • Require construction contractors to document compliance with the identified mitigation measures.
SC-AQ-5	LAUSD shall encourage ride-sharing programs for students and teachers as well as maintain fleet vehicles such as school buses, maintenance vehicles, and other service fleet vehicles in good condition in order to prevent significant increases in air pollutant emissions created by operation of a new school.

The Project specific analysis provided in Section 4.3.2.2 concludes that implementation of the Project would have less than significant impacts on the surrounding community and the school site.

4.3.2 Impact Analysis

a) Would the project conflict with or obstruct implementation of the applicable air quality plan?

Less than Significant Impact. Neither the proposed Project or the SUP as a whole is a large, regionally significant project that would affect the regional growth projections made by the Southern California Association of Governments (SCAG) and used by the South Coast Air Quality Management District (SCAQMD) in formulating its Air Quality Management Plan (AQMP). The student and faculty population at the school would not increase as a result of the Project. Additionally, the projected emissions from the Project would not exceed the SCAQMD's regional significance thresholds (see Table 4.3-5, Maximum Daily Unmitigated Regional Construction Emissions). Thus, the Project would not be considered by SCAQMD to

be a substantial source of air pollutant emissions, and would not conflict or obstruct implementation of the AQMP. Impacts would be less than significant. No mitigation measures or further evaluation are required.

b) Would the project violate any air quality standard or contribute substantially to an existing or projected air quality violation?

Less than Significant Impact. Project construction activities would be expected to generate short-term air quality impacts. Construction emissions of criteria pollutants and toxic air contaminants occur both on-site and off-site. On-site air pollutant emissions consist principally of exhaust emissions from off-road heavy-duty construction equipment, as well as fugitive particulate matter from earth working and material handling operations. Evaporative emissions of volatile organic compounds occur during architectural coatings application and paving. Off-site emissions result from workers commuting to and from the job site, as well as from trucks hauling materials to the site and construction debris for disposal.

Emissions of criteria pollutants during project construction were estimated using the construction module of the California Emissions Estimator Model (CalEEMod), Version 2016.3.1[36] . All modeling output files and additional assumptions are provided in Appendix A.

For the purpose of this analysis, it was estimated construction of the proposed Project would begin in mid-January 2019 and finish mid-January 2022. As discussed in the Project Description, the Project's construction duration is expected to be three to five years. When determining the air quality impacts of a project, the shorter the construction duration is the greater the air quality impacts are. This is primarily because a shorter construction duration would require more equipment to be operating simultaneously, resulting in greater daily emissions. When analyzing the air quality impacts of the Project, a conservative assumption of a 36-month construction duration, the shortest feasible construction duration, was used.

Preliminary design and scheduling information from LAUSD was used in conjunction with CalEEMod to estimate the number of days to execute the following construction phases:

- Demolition,
- Site preparation,
- Grading,
- Building renovation and construction,
- Architectural coating,
- Onsite paving,
- Offsite (local street) paving

The types and numbers of pieces of equipment anticipated in each phase of construction and development were estimated using information provided by LAUSD, CalEEMod and experience with similar projects. With this information, a hypothetical but reasonable week-by-week construction schedule was developed and input to CalEEMod. It was also assumed that the construction contractor would comply with all pertinent provisions of SCAQMD Rule 403. Equipment exhaust emissions were determined using CalEEMod default values for horsepower and load factors, which are from the California Air Resources Board's OFFROAD2011 model.

[36] California Emissions Estimator Model. User's Guide, Version 2016.3.1. Prepared by Breeze Software for the California Air Pollution Control Officers Association, in collaboration with South Coast Air Quality Management District and the California Air Districts. September 2016.

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Table 4.3-5, Maximum Daily Unmitigated Regional Construction Emissions shows the model's estimates of maximum daily emissions of the criteria pollutants.

Table 4.3-2
MAXIMUM DAILY UNMITIGATED REGIONAL CONSTRUCTION EMISSIONS

Construction Activity	Maximum Emissions (lbs/day)				
	ROG	NO_x	CO	PM_{10}	$PM_{2.5}$
Maximum Emissions (With Rule 403)	57.3	27.4	23.5	2.8	1.6
SCAQMD Significance Thresholds	*75*	*100*	*550*	*150*	*55*
Significant (Yes or No)	**No**	**No**	**No**	**No**	**No**

Source: Calculated by UltraSystems with CalEEMod (Version 2016.3.1).
ROG – reactive organic gases
NO_x – nitrogen oxides
CO – carbon monoxide
PM – particulate matter

For each criteria pollutant, construction emissions would be below the pollutant's SCAQMD significance threshold. Therefore, the Project would not violate any air quality standard or contribute substantially to an existing or projected air quality violation. Construction emissions would be less than significant. No mitigation measures or further evaluation are required.

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

Less than Significant Impact. The SCAQMD has divided the Basin into source receptor areas (SRAs), based on similar meteorological and topographical features. The proposed Project site is located in the SCAQMD's East San Fernando Valley SRA (SRA 7). The most representative station of the site is the Reseda Station, which is located at 18330 Gault Street, Reseda, CA, 91702. This station is 6.9 miles northwest of the project site. The Reseda Station monitors $PM_{2.5}$, NO_2 and O_3. The nearest air quality monitoring station that records PM_{10}, is the Los Angeles North Main Street Station at 1630 North Main Street, Los Angeles, CA 90012, which is 13.25 miles southeast of the project site. The SCAQMD's SRA 7 station measures CO[37]. No station within a reasonable distance measures SO_2. The ambient air quality data in the proposed project vicinity as recorded at these stations for 2013 to 2015 and the applicable federal and state standards are shown in Table 4.3-2.

[37] Personal communication from Jason Low, South Coast Air Quality Management District, Diamond Bar, CA to Sloane Seferyn, UltraSystems Environmental, Irvine, CA, February 15, 2017. The SCAQMD's East San Fernando Valley SRA (SRA 7) station data were obtained from the Reseda, Los Angeles-North Main Street, and Santa Clarita stations. The Burbank station is currently closed down.

Table 4.3-3
AMBIENT AIR QUALITY MONITORING DATA

Air Pollutant	Standard/Exceedance	Year		
		2013	2014	2015
Carbon Monoxide (CO)	Year Coverage	91.7%	43%[b]	ND[a]
	Max. 1-hour Concentration (ppm)	ND	3[b]	ND
	Max. 8-hour Concentration (ppm)	2.4	3[b]	ND
	# Days > Federal 1-hour Std. of 35 ppm	ND	ND	ND
	# Days > Federal 8-hour Std. of 9 ppm	ND	ND	ND
	# Days > California 8-hour Std. of 9.0 ppm	ND	ND	ND
Ozone (O_3)	Year Coverage	95%	95%	96%
	Max. 1-hour Concentration (ppm)	0.124	0.116	0.119
	Max. 8-hour Concentration (ppm)	0.092	0.092	0.094
	# Days > Federal 8-hour Std. of 0.075 ppm	20	27	32
	# Days > California 1-hour Std. of 0.09 ppm	0	0	0
	# Days > California 8-hour Std. of 0.07 ppm	21	31	34
Nitrogen Dioxide (NO_2)	Year Coverage	65%	79%	96%
	Max. 1-hour Concentration (ppb)	ND	ND	ND
	Annual Average (ppb)	ND	ND	13
	# Days > California 1-hour Std. of 0.18 ppm	0	0	0
Sulfur Dioxide (SO_2)	Year Coverage	ND	ND	ND
	Max. 24-hour Concentration (ppb)	ND	ND	ND
	Annual Average (ppm)	ND	ND	ND
	# Days > California 24-hour Std. of 0.04 ppm	ND	ND	ND
Respirable Particulate Matter (PM_{10})	Year Coverage	97%	92%	95%
	Max. 24-hour Concentration (µg/m^3)	57	66	73
	#Days > Fed. 24-hour Std. of 150 µg/m^3	0	0	0
	#Days > California 24-hour Std. of 50 µg/m^3	21.4	18.7	13.8
	Annual Average (µg/m^3)	29.5	30.6	27.1
Fine Particulate Matter ($PM_{2.5}$)	Year Coverage	98%	63%	88%
	Max. 24-hour Concentration (µg/m^3)	41.8	27.2	36.8
	State Annual Average (µg/m^3)	9.8	ND	ND
	#Days > Fed. 24-hour Std. of 35 µg/m^3	3.0	ND	3.6
	Federal Annual Average (µg/m^3)	9.8	ND	8.8

Sources:
http://www.arb.ca.gov/adam/select8/sc8start.php. Accessed February 15, 2017.
https://www.arb.ca.gov/adam/trends/trends1.php. Accessed February 15, 2017.
https://www.arb.ca.gov/adam/topfour/topfourdisplay.php. Accessed February 15, 2017.
http://www.aqmd.gov/home/library/air-quality-data-studies/historical-data-by-year. Accessed February 15, 2017.

[a]ND – There were insufficient (or no) data available to determine the value.
[b]South Coast Air Quality District incomplete data.

Attainment of Ambient Air Quality Standards

Table 4.3-3 shows the area designation status of the South Coast Air Basin for each criteria pollutant for both the National Ambient Air Quality Standards (NAAQS) and California Ambient Air Quality Standards (CAAQS) as of April 2017.

Table 4.3-4
FEDERAL AND STATE ATTAINMENT STATUS

Pollutants	Federal Classification	State Classification
Ozone (O_3)	2008 8-Hour: Non-Attainment (Extreme)	Non-Attainment
	2015 8-Hour: Designation Pending	Not Applicable
Particulate Matter (PM_{10})	Maintenance	Non-Attainment
Fine Particulate Matter ($PM_{2.5}$)	Non-Attainment	Non-Attainment
Carbon Monoxide (CO)	Maintenance	Attainment
Nitrogen Dioxide (NO_2)	Maintenance	Non-Attainment
Sulfur Dioxide (SO_2)	Attainment	Attainment

Source: National Ambient Air Quality Standards (NAAQS) and California Ambient Air Quality Standards (CAAQS) Attainment Status for South Coast Air Basin. South Coast Air Quality Management District. http://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/naaqs-caaqs-feb2016.pdf?sfvrsn=2.
U.S. Environmental Protection Agency, "PM-10 (1987) Designated Area State/Area/County Report as of February 13, 2017." Green Book. [https://www3.epa.gov/airquality/greenbook/pbcs.html#CA]. Accessed February 13, 2017.

The Project would replace or upgrade facilities on the campus of Grant High School, but it would not increase the number of students or faculty at Grant High School, and will not introduce major new emission sources. (The new buildings will replace existing buildings that would be removed as a part of the Project.) No new vehicle trips would be generated, and there would be no increase in mobile source emissions. Furthermore, building upgrades and replacement of old, energy-inefficient structures with those that use less energy would reduce emissions from space heating and other onsite sources. Therefore, there would be no net increase in regional emissions of any criteria pollutant, and the impact would be less than significant. No mitigation measures or further evaluation are required.

d) Would the project expose sensitive receptors to substantial pollutant concentrations?

Less than Significant Impact. Sensitive receptors are persons who are more susceptible to air pollution than the general population, such as children, athletes, the elderly, and the chronically ill. Facilities and structures where these sensitive people live or spend considerable amounts of time are known as sensitive receptors. Land uses identified to be sensitive receptors by SCAQMD (1993) in its *CEQA Air Quality Handbook* include residences, schools, playgrounds, child care centers, athletic facilities, long-term health care facilities, rehabilitation centers, convalescent centers, and retirement homes. Sensitive receptors may be at risk of being affected by air emissions released from the construction and operation of the proposed Project.

Examples of land uses where substantial numbers of sensitive receptors are often found are schools, daycare centers, parks, recreational areas, medical facilities, nursing homes, and convalescent care facilities. Residential areas are also considered to be sensitive to air pollution because residents (including children and the elderly) tend to be at home for extended periods of time, resulting in sustained exposure to pollutants. As seen in Figure 4.3-1 and Table 4.3-4, the nearest sensitive receptors are an apartment building on the north and Los Angeles Valley Community College on the south sides of the school. For the analysis of impacts on Grant High School students, the receptor point was assumed to be roughly the center of the academic portion of the campus, because students do not remain in one location the entire school day.

Following SCAQMD guidance,[38] only onsite construction emissions of NO_x, CO, PM_{10}, and $PM_{2.5}$ were considered in the localized significance analysis. According to the CalEEMod analysis, the highest onsite emissions of all pollutants except PM_{10} would occur during new building construction. For PM_{10}, the activity with the largest onsite emissions would be demolition. It was estimated that, as a worst case, the maximum daily disturbance for demolition and for new building construction would be 1.42 and 0.52 acres, respectively.

Localized significance thresholds were obtained by interpolation from tables in Appendix C of the SCAQMD's *Final Localized Significance Threshold Methodology*.[39] Table 4.3-6 shows the results of the localized significance analysis for the proposed project. For the unmitigated case, emissions of no criteria pollutant would exceed their threshold for significance. Therefore, localized air pollution impacts would be less than significant. No mitigation measures or further evaluation are required.

[38] Chico, T. and Koizumi, J, 2003. Final Localized Significance Threshold Methodology: South Coast Air Quality Management District, Diamond Bar, CA. June.
[39] Chico, T. and Koizumi, J. Op. Cit.

Figure 4.3-1
OFFSITE SENSITIVE RECEPTORS

Table 4.3-5
NEAREST OFFSITE SENSITIVE RECEPTORS

	Sensitive Receptor Name	Location	Distance from Proposed Project (Feet)
1	Apartment Building	13031 Oxnard Street Van Nuys, CA 91401 Latitude: 34.179581 Longitude: -118.417065	80
2	Los Angeles Valley Community College	5792 Ethel Avenue Sherman Oaks, CA 91401 Latitude: 34.175398 Longitude: -118.418026	85
3	The Church of Jesus Christ Latter-Day Saints	13042 Burbank Blvd. Van Nuys, CA 91401 Latitude: 34.171921 Longitude: -118.417196	93
4	Private Residence	5914 Coldwater Canyon Ave. Valley Village, CA 91607 Latitude: 34.177930 Longitude: -118.413567	271
5	Sunrise School	13130 Burbank Blvd. Sherman Oaks, CA 91401 Latitude: 34.171677 Longitude: -118.419267	375
6	Maggy Haves School	6100 Coldwater Canyon Ave. North Hollywood, CA 91606 Latitude: 34.181424 Longitude: -118.413353	767
7	Monlux Elementary School	6051 Bellaire Avenue North Hollywood, CA 91606 Latitude: 34.181437 Longitude: -118.409848	1318

Source: UltraSystems and Google Earth Pro. 2016.

Table 4.3-6
RESULTS OF LOCALIZED SIGNIFICANCE ANALYSIS

Nearest Sensitive Receptor	Distance		Maximum On-Site Emissions (lbs/day)			
	Feet	Meters	NO_x	CO	PM_{10}	$PM_{2.5}$
Residence on Oxnard Street	400	122	26.4	20.0	2.2	1.4
SCAQMD LST for 0.52 acre or 1.42 acres[a]			*100*	*1,393*	*35.5*	*2.7*
Significant (Yes or No)			**No**	**No**	**No**	**No**
Los Angeles Valley Community College	2,575	785	26.4	20.0	2.2	1.4
SCAQMD LST for 0.52 acre or 1.42 acres[a]			*191*	*7,267*	*139*	*19*
Significant (Yes or No)			**No**	**No**	**No**	**No**
Students on Campus	220	67	24.1	19.7	2.1	1.3
SCAQMD LST for 0.52 acre or 0.64 acre[a]			*100*	*1,393*	*32*	*2.7*
Significant (Yes or No)			**No**	**No**	**No**	**No**

Sources:
Emissions calculated by UltraSystems with CalEEMod (Version 2016.3.1).
Chico, T. and Koizumi, J. Final Localized Significance Threshold Methodology. South Coast Air Quality Management District, Diamond Bar, California. June 2003.
Thresholds interpolated linearly between distances and then between acreages. Thresholds are for source-receptor area 7 (East San Fernando Valley).
[a] Emission maxima for NO_x, CO and $PM_{2.5}$ will occur during building construction. Maximum PM_{10} emissions will occur during demolition.

e) Would the project create objectionable odors affecting a substantial number of people?

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 volatile organic compounds (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 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.

f) Would the project expose sensitive receptors in proximity to freeways and major roadways to substantial pollutant concentrations?

Less than Significant Impact. The nearest freeway is the Hollywood Freeway (State Route 170, which is 0.9 mile northeast of the campus. In addition, the campus is bound on two sides by Oxnard Street and Coldwater Canyon Avenue, both of which are major roadways. The student and faculty population at Grant High School would not increase as a result of the Project and the Project will not bring sensitive receptors closer to freeways and major roadways; hence there would be no new or increased exposure of sensitive receptors to criteria pollutants and toxic air contaminants as a result of the Project. Therefore, impacts would be less than significant. No mitigation measures or further evaluation are required.

4.4 Biological Resources

The following analysis of potential biological resource impacts is based on the findings from the regulatory database searches and reports in Appendix B.

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?	☐	☐	☐	☒

4.4.1 Summary of Impacts

The Program EIR evaluated the potential for implementation of the SUP-related site-specific Projects to impact biological resources. Upon implementation of regulatory requirements and SC-BIO-2, SC-BIO-3, and SC-BIO-4, as well as the proposed Mitigation Measure MM-BIO-1, the impacts associated with nesting birds, wildlife movement, and impacts to native trees would be less than significant.

The Program EIR includes SCs for minimizing impacts on biological resources in areas where future projects would be implemented under the SUP. Applicable SCs related to biological resource impacts and the Project-specific Mitigation Measure MM-BIO-1 are provided in Table 4.4-1.

Table 4.4-1
BIOLOGICAL RESOURCES STANDARD CONDITIONS OF APPROVAL AND PROJECT-SPECIFIC MITIGATION MEASURE BIO-1: NESTING BIRDS DETERRENTS

Applicable SCs	Description
SC-BIO-2	**Light Impacts to Sensitive Species** -LAUSD shall protect sensitive species from harmful exposure to light by shielding light sources, redirecting light sources, or using low intensity lighting.
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[40]) should occur outside of avian breeding season to avoid take of birds or their eggs.[41] Depending on the avian species present, a qualified biologist may determine that a change in the breeding season dates is warranted. -If avoidance of the avian breeding season is not feasible, beginning 30 days prior to the initiation of the project activities, a qualified biologist with experience in conducting breeding bird surveys shall conduct weekly bird surveys to detect protected native birds occurring in suitable nesting habitat that is to be disturbed and (as access to adjacent areas allows) any other such habitat within 300 feet of the disturbance area (within 500 feet for raptors). The surveys shall continue on a weekly basis with the last survey being conducted no more than three days prior to the initiation of project activities. If a protected native bird is found, LAUSD shall delay all project activities within 300 feet of the suitable nesting habitat (within 500 feet for suitable raptor nesting habitat) until August 31. Alternatively, the qualified biologist could continue the surveys in order to locate any nests. If an active nest is located, project activities within 300 feet of the nest (within 500 feet for raptor nests), or as determined by a qualified biologist, shall be postponed until the nest is vacated and juveniles have fledged and there is no evidence of a second attempt at nesting. Flagging, stakes, and/or construction fencing shall be used to demarcate the inside boundary of the 300- or 500-foot buffer between the project activities and the nest. Project personnel, including all contractors working on site, shall be instructed on the sensitivity of the area. LAUSD shall provide results of the recommended protective measures to document compliance with applicable State and Federal laws pertaining to the protection of native birds. -If the qualified biologist determines that a narrower buffer between the project activities and observed active nests is warranted, a written explanation as to why (e.g., species-specific information; ambient conditions and birds' habituation to them; and the terrain, vegetation, and birds' lines of sight between the project activities and the nest and foraging areas) shall be submitted to LAUSD OEHS project manager. Construction contractors can then reduce the demarcated buffer. -No construction shall occur within the fenced nesting zone until the young have fledged, are no longer being fed by the parents, have left the nest, and will no longer by impacted the construction. -A biological monitor shall be present on site during all grubbing and clearing of vegetation to ensure that these activities remain outside the demarcated buffer and that the flagging, stakes, and/or construction fencing are maintained, and to minimize the likelihood that active nests are abandoned or fail due to project activities. The biological monitor shall send weekly monitoring reports to LAUSD OEHS project manager during the grubbing and clearing of vegetation, and shall notify LAUSD immediately if project activities damage avian nests.

[40] Substrate is the surface on which a plant or animal lives.
[41] Take means to hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture or kill (Fish and Game Code Section 86), and includes take of eggs and/or young resulting from disturbances that cause abandonment of active nests.

Applicable SCs	Description
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.
MM-BIO-1	**MITIGATION MEASURE: MM-BI0-1 NEST DETERRENTS** To reduce impacts to nesting birds, avian management tactics include implementation of bird deterrent methods in active construction sites. Nest deterrents shall be installed and monitored under the guidance of a qualified biologist. Nest deterrents/methods will be implemented in all applicable situations to reduce the success of nest initiation within Project limits. In situations when deterrents fail, all feasible means will be used to allow the nest to remain without precluding construction. Nesting deterrents are intended for the prevention of nesting attempts. Devices are not approved to be installed or used once a nest has become active. Installation and maintenance of the deterrents by the qualified biologist will not represent a violation of the Migratory Bird Treaty Act (MBTA), California Fish and Game Code, California Endangered Species Act, Federal Endangered Species Act, or the Bald and Golden Eagle Protection Act permits, and regulations as long as such activities do not result in the take of an active nest.

The Project-specific analysis provided in Section 4.4.2 concludes that implementation of the Project would have less than significant impacts on biological resources with implementation of the LAUSD SCs in Table 4.4-1 and the proposed Mitigation Measure MM-BIO-1**.**

4.4.2 Impact Analysis

a) Would the project 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 Game or U.S. Fish and Wildlife Service?

No Impact. The Project site is an existing school campus located in an urban area. The developed land within the campus is disturbed and consists primarily of non-native vegetation species commonly used for landscaping. Based on the results of the literature search, there are no sensitive species or suitable habitat for sensitive species expected to occur in the Project vicinity.[42] If special-status species are observed, LAUSD would comply with applicable United States Fish and Wildlife Service (USFWS), California Department of Fish and Wildlife (CDFW) and/or United States Army Corps of Engineers provisions.

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-

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

status species in local or regional plans, policies, or regulations, or by the CDFW or USFWS. No mitigation measures or further evaluation are required.

b) Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?

No Impact. The Project site is an existing school campus. No riparian habitat or other sensitive natural communities as designated by the City or County of Los Angeles, the CDFW or the USFWS, were observed on or near the Project site. Therefore, the Project is not anticipated to have direct or indirect impacts on riparian habitats or other sensitive natural communities. No mitigation measures or further evaluation are required.

c) Would the project have a substantial adverse effect on federally protected wetlands as defined by § 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?

No Impact. No federally protected wetlands occur on or near the Project site; therefore, the Project is not anticipated to have direct or indirect impacts on federally protected wetlands as defined by Section 404 of the Clean Water Act. No mitigation measures or further evaluation are required.

d) Would the project 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?

Less than Significant with Mitigation Incorporated. Due to the nature of the Project and its location within an urban area on an existing school campus, the only wildlife for which the potential to impact movement exists, are migrating birds. As is the case for most LAUSD campuses, Grant High School is located in a suburban/urbanized setting next to and surrounded by urban land uses. Campuses are not available for overland wildlife movement or migration, and no existing LAUSD schools are in a designated habitat linkage.

No wildlife corridors are present within the Project site; therefore, the Project is not anticipated to have direct or indirect impacts on wildlife corridors. The Project site does not support resident or migratory fish species; therefore, the Project is not anticipated to have direct or indirect impacts on resident or migratory fish species.

The Project site supports landscaped/ornamental vegetation and structures that could potentially provide cover and nesting habitat for bird species that have adapted to urban areas, such as rock pigeons (*Columba livia*) and mourning doves (*Zenaida macroura*). Mourning doves are protected by the Migratory Bird Treaty Act (MBTA) and the Fish and Game Code, which render it unlawful to take native breeding birds, and their nests, eggs, and young. Temporary direct impacts on breeding birds could occur from increased noise, vibration, and dust during construction, which could adversely affect the breeding behavior of some birds, and lead to the loss (take) of eggs and chicks, or nest abandonment.

During the biological survey of the site, four inactive cliff swallow (*Petrochelidon pyrrhonota*) nests were observed under the eaves of Building 200. House sparrows (*Passer domesticus*) were also seen occupying the eaves. Tree trimming and removal has the potential to impact nesting birds. Sixty trees of varying types would be removed as a part of the Project. However, the loss of these trees and planters would be compensated for through planting of new trees and other landscaping features as part of the Project.

As required by LAUSD's SUP, the Project would incorporate SC-BIO-2**,** SC-BIO-3**,** which requires shielding of light pollution, a bird nest search, and delaying tree removal if the trees contain active nests. In addition, pursuant to site specific MM-BIO-1 (refer to Section 4.4.2.4), prior to construction nest deterrents may be installed on the eaves and overhangs of the buildings that will be demolished or modernized to prevent birds (specifically cliff swallows) from building nests. Implementation of SC-BIO-2, SC-BIO-3**,** and mitigation measure MM-BIO-1 would avoid or reduce direct impacts on breeding birds to less than significant levels.

In regard to the significance criterion, with implementation of SC-BIO-2, SC-BIO-3, and mitigation measure MM-BIO-1 (refer to Section 4.4.2.4), the Project is not anticipated to interfere substantially with or impede (1) the movement of any resident or migratory fish or wildlife species, (2) established resident or migratory wildlife corridors, or (3) the use of wildlife nursery sites. With implementation of SC-BIO-2, SC-BIO-3, and MM-BIO-1, impacts related to the potential interference with wildlife movement or nesting would be less than significant. No mitigation measures or further evaluation are required.

e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

Less than Significant. Los Angeles City Ordinance 177404[43] affords extra protection to some native trees: native oaks, including valley oak (*Quercus lobata*) and coast live oak (*Quercus agrifolia*); southern black walnut (*Juglans californica var. californica*); western or California sycamore (*Platanus racemosa*); and California Bay tree (*Umbellularia californica*). Of the 188 trees identified in the tree inventory, eight are California sycamore, which are growing on or near the Project site and/or overhang onto school sidewalks from City property. Only one of the eight California sycamores is located entirely on the Project site. This tree is not scheduled for removal; however,[44] if it becomes necessary to severely prune or remove the California sycamore, LAUSD shall implement SC-BIO-3 and SC-BIO-4, and an application for a tree removal permit will be submitted to the City of Los Angeles Department of Public Works. A Protected Tree Report will be submitted with the application identifying the proposed mitigation. The current minimum tree replacement ratio is 4:1.

With implementation of SC-BIO-3 and SC-BIO-4, compliance with the City of Los Angeles Municipal Code requirements regarding the preservation of protected trees, and adhering to the requirements of the tree removal permit, including tree replacement requirements, potential impacts related to conflicts with local policies or ordinances protecting biological resources would be less than significant. No mitigation measures or further evaluation are required.

f) Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

No Impact. The Project site is not located within an adopted Habitat Conservation Plan (HCP), Natural Community Conservation Plan (NCCP), or other approved local, regional, or state habitat conservation plan. There are no habitat reserves located within the District, nor are there any other habitat conservation plans in the District.[45] Therefore, the Project would not conflict with the provisions of an adopted HCP, NCCP, or other approved local, regional, or state HCP. No impact is anticipated. No mitigation measures or further evaluation are required.

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43 Los Angeles Department of City Planning. Ordinance 177404. Native Tree Protection.

44 Carlberg Associates, 2016. Arborist Survey, Grant High School Modernization Project-Tree Inventory, Los Angeles California, Letter of Compliance with Protected Tree Report. August 15.

45 *Ibid*, at page 5.4-48.

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?	☐	☐	☒	☐

4.5.1 Summary of Impacts

The Program EIR evaluated the potential for implementation of the SUP-related site-specific projects to impact cultural resources[46]. Upon implementation of regulatory requirements and SCs, the impacts associated with historical resources could be potentially significant, and impacts associated with cultural, and paleontological resources would be less than significant.

The Program EIR includes SCs for minimizing impacts on cultural resources in areas where projects would be implemented under the SUP. Applicable SCs related to cultural resources impacts for the proposed Project at Grant High School are listed in Table 4.5-1.

Table 4.5-1
CULTURAL RESOURCES STANDARD CONDITIONS OF APPROVAL

Applicable SCs	Description
SC-CUL-5	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 use or display, if features are not retained by LAUSD for reuse or display.
SC-CUL-6	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-7	LAUSD shall retain a qualified archaeologist to be available on-call. The qualified archaeologist shall meet the Secretary of the Interior's Professional Qualifications Standards (48 Federal Register 44738–39).
SC-CUL-8	The contractor shall halt construction activities in the immediate area and notify the LAUSD of a discovery. LAUSD shall retain a qualified archeologist to make an immediate evaluation of significance and appropriate treatment of the resource. To complete this assessment, the qualified archeologist will be afforded the necessary time to recover, analyze, and curate the find. The qualified archeologist shall recommend the extent of archeological monitoring necessary to ensure the protection of any other resources that may be in the area. Construction activities may continue on other parts of the building site while evaluation and treatment of historical or unique archaeological resources takes place.

[46] Faxon, Donald M. 2017 Historic Resource Evaluation Report for Grant High School, 13001 Oxnard Street, Los Angeles, California 91401. Submitted by Sapphos Environmental Inc. Submitted to Los Angeles Unified School District. On file Los Angeles Unified School District, Los Angeles, California.

Applicable SCs	Description
SC-CUL-9	LAUSD shall implement an archaeological monitoring program for construction activities at a site prepared by a qualified archaeologist under the following conditions: (1) when a Phase I Site Investigation shows a strong possibility that unique archeological resources are buried on the site; and/or (2) when unique architectural resources have been identified on a site, but LAUSD does not implement a Phase III Data Recovery/Mitigation Program because the resources can be recovered through the archaeological monitoring program.
SC-CUL-10	All work shall stop within a 30-foot radius of the discovery. Work shall not continue until the discovery has been evaluated by a qualified archaeologist. The qualified archaeologist shall assess the find(s) and, if it is determined to be of value, shall draft a monitoring program and oversee the remainder of the grading program. Should evidence of prehistoric or historic cultural resources be found, the archaeologist shall monitor all ground-disturbing activities related to the proposed project. Any significant archaeological resources found shall be preserved as determined necessary by the archaeologist and offered to a local museum or repository willing to accept the resource. Any resulting reports shall also be forwarded to the South Central Coastal Information Center at the California State University, Fullerton.
SC-CUL-11	Cultural resources sensitivity training shall be conducted by a qualified archaeologist for all construction workers involved in moving soil or working near soil disturbance. This training shall review the types of archaeological resources that might be found, along with laws for the protection of resources.
SC-CUL-12	LAUSD shall determine whether it is feasible to prepare and implement a Phase III Data Recovery/Mitigation Program. A Phase III Data Recovery/Mitigation Program would be designed by a Qualified Archaeologist to recover a statistically valid sample of the archaeological remains and to document the site to a level where the impacts can be determined to be less than significant. All documentation shall be prepared in the standard format of the ARMR Guidelines, as prepared by the OHP. Once a Phase III Data Recovery/Mitigation Program is completed, an archaeological monitor shall be present on site to oversee the grading, demolition activities, and/or initial construction activities to ensure that construction proceeds in accordance with the adopted Phase III Data Recovery/Mitigation Program. The extent of the Phase III Data Recovery/Mitigation Program and the extent and duration of the archaeological monitoring program depend on site-specific factors.
SC-CUL-13	All work shall stop within a 30-foot radius of the discovery. Work shall not continue until the discovery has been evaluated by a qualified archaeologist and the local Native American representative has been contacted and consulted to assist in the accurate recordation and recovery of the resources.
SC-CUL-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 on site for the duration of the ground disturbances to ensure the protection of any other resources that may be in the area.
SC-CUL-15	The paleontological monitor shall be on site for all ground altering activities and shall advise LAUSD as to necessary means of protecting potentially significant paleontological resources, including, but not limited to, possible cessation of construction activities in the immediate area of a find. If resources are identified during the monitoring program, the paleontologist shall be afforded the necessary time and funds to recover, analyze, and curate the find(s). Subsequently, the monitor shall remain on site for the duration of the ground disturbances to insure the protection of any other resources that may be in the area.

The Project-specific analysis provided in Section 4.5.2 concludes that implementation of the Grant High School Project would have less than significant impacts on historical and cultural resources.

4.5.2 Impact Analysis

a) Would the project cause a substantial adverse change in the significance of a historical resource as defined in § 15064.5?

No Impact. An historical resource is defined in § 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. Historical resources are further defined as being associated with significant events, important persons, or distinctive characteristics of a type, period or method of construction; representing the work of an important creative individual; or possessing high artistic values. Resources listed in or determined

eligible for the California Register, included in a local register, or identified as significant in a historic resource survey are also considered as historical resources under CEQA.

Similarly, the National Register criteria (contained in 36 Code of Federal Regulations [CFR] 60.4) are used to evaluate resources when complying with Section 106 of the National Historic Preservation Act (NHPA). Specifically, the National Register criteria states that eligible resources comprise districts, sites, buildings, structures, and objects that possess integrity of location, design, setting, materials, workmanship, feeling, and association, and that (1) are associated with events that have made a significant contribution to the broad patterns of our history; or (2) that are associated with the lives of persons significant in our past; or (3) 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 (4) that have yielded or may be likely to yield, information important to history or prehistory.

The core campus is composed of one- and two-story permanent buildings clad in brick, dating to 1958 and 1959. The school was designed by the firm of Stanton and Stockwell, who did other work in the downtown Los Angeles area during this period, and opened in September 1959. Clusters of one-story portable buildings dating from 1964 to 1991 are located in the northwest and southeast corners of the campus. The permanent buildings are organized around a central rectangular lawn with a stage on the north and a seating area on the south. Two brick-clad concrete two-story classroom buildings form the north end of the campus. These L-shaped buildings frame a ceremonial gate to the school from Oxnard Boulevard. The main entry to the campus, however, is on the east side, into the administration buildings. Paired with the administration building on the east side is the library building. The south side of the quad is formed by the gymnasium building and the food service/multipurpose room building. A large lunch shelter joins these two buildings. The west side of the quad is formed by one-story classroom and utility buildings.

The Historic Resource Evaluation Report prepared by Sapphos[47] [See Appendix C-1] stated that the campus was determined "to not be eligible for listing in the California Register of Historic Resources." This finding is based on the campus not meeting LAUSD's criteria standards, and previous alterations made to one of the primary classroom buildings that would have prevented it from meeting the threshold for integrity retention. Also, the property was determined not to be a historical resource for the purposes of § 15064.5(a) of the CEQA Guidelines. No individual buildings were determined eligible during this evaluation.

Historic Resources in the Project Vicinity. The California Historic Resources Inventory System (CHRIS) archival records search indicated that no previously identified historical resources are within the Project site. Two historic period structures were recorded within the 0.5-mile buffer. The Olive Fresh store and attached three-story warehouse, P-19-188447, was built in 1962, with the addition in 1985.[48] Built in the Modern style with Spanish elements, this commercial building is along Oxnard Street between Bellaire Avenue Boulevard and Whitsett Avenue, approximately one mile east of the northeast corner of Grant High School. An unnamed apartment building in the Mid-Century Modern style is situated on Coldwater Canyon Avenue approximately 600 feet north of the northeast corner of Grant High School.[49] This three-story building was designed by noted architect Abraham Shapiro. Both structures were assessed and neither was qualified for the National Register of Historic Places.

47 See Appendix H.

48 Crawford, K. A. 2008 Primary Record: T-Mobile SV11827A [Olive Fresh store]. On file at the South Central Coastal 2008Information Center, California State University, Fullerton, California.

49 Krintz, Jennifer. 2010. Primary Record: 6131 Coldwater Canyon Avenue. On file at the South Central Coastal Information Center, California State University, Fullerton, California.

Because the campus has been determined to be ineligible as an historical resource under CEQA guidelines, no impact to historical resources would occur. No mitigation measures or further evaluation are required.

b) Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?

Less Than Significant Impact. An archaeological resource is defined in § 15064.5(c) of the CEQA Guidelines as a site, area or place determined to be historically significant as defined in § 15064(a) of the CEQA Guidelines, or as a unique archaeological resource defined in § 21083.2 of the Public Resources Code 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 will not include excavation into previously undisturbed native soils, as the Project site includes areas with existing structures and a landscaped area, with no known archaeological content. Further, the campus has been subject to past subsurface disturbance associated with grading and foundations for the existing buildings and structures. The cultural resources investigation, which included a CHRIS records search of the Project site and buffer zone, a search of the Sacred Lands File by the Native American Heritage Commission (NAHC), and a pedestrian field survey, is documented in the Phase I Cultural Resources Survey (Appendix I). Based upon the findings of this investigation, it is unlikely that undisturbed unique archeological resources exist on the project site. However, in the event of an unexpected disturbance, implementation of SC-CUL-7 through SC-CUL-13 would ensure that impacts to archaeological resources would be less than significant. No mitigation measures or further evaluation are required.

c) Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Less Than Significant Impact. As discussed in the response to Checklist Question b), the Project will not include excavation into previously undisturbed native soils, as the Project site includes areas with existing buildings, structures and landscaped areas, with no known paleontological content and has been subject to past subsurface disturbance associated with grading and foundations. It is unlikely that undisturbed unique archeological resources exist on the Project site. However, grading activities associated with development of the Project would 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-14 and SC-CUL-15 would further ensure that impacts to paleontological resources would be less than significant. No mitigation measures or further evaluation are required.

d) Would the project disturb any human remains, including those interred outside of formal cemeteries?

Less Than Significant Impact. As previously discussed in the responses to Checklist Questions b) and c), the Project will not include excavation into previously undisturbed native soils. In the unlikely event that human remains are uncovered during Project demolition, excavation, or grading, California Government Code §§ 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 § 27491 of the California 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 § 5097.98 of the PRC. However, in the unlikely event that Project activities result in the unanticipated discovery of unknown human remains, including those interred outside of formal cemeteries, compliance with the existing regulations (i.e., California Government Code § 27460) and

implementation of SC-CUL-10 would further ensure that impacts related to the accidental discovery of human remains would be less than significant. No mitigation measures or further evaluation are required.

4.6 Geology and Soils

The following evaluation of geology and soils is based, in part, on the technical report entitled "Geotechnical Evaluation Ulysses S. Grant High School Modernization, 13000 Oxnard Street, Van Nuys, California" ("Geotechnical Report"). The Geotechnical Report is included as Appendix D of this IS/MND and evaluates potential geological and soil conditions at Grant High School and in the Project vicinity, and provides site-specific recommendations for appropriate foundations and construction methods.

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?	☐	☐	☐	☒

4.6.1 Summary of Impacts

The Program EIR evaluated the potential for implementation of the SUP-related projects to impact geological and soil resources.

The Program EIR includes a SC for minimizing impacts on geological and soil resources in areas where future projects would be implemented under the SUP. It is provided in Table 4.6-1.

Table 4.6-1
GEOLOGY AND SOILS STANDARD CONDITION OF APPROVAL

Applicable SCs	Description
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.

The Project-specific analysis provided in Section 4.6.2 concludes that implementation of the propose Project would also have less than significant impacts on geological and soil resources.

4.6.2 Impact Analysis

a) Would the project 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.

Less Than Significant. According to the geotechnical report,[50] the Project site is situated in the San Fernando Valley, which is located in the Los Angeles Basin of the Transverse Ranges Geomorphic Province. The province encompasses an area approximately 40- to 60-mile-wide (north to south) by 320-mile long (west to east) between Point Arguello and San Miguel Island on the west and Eagle and Pinto Mountains of the Mojave Desert on the east. The province consists of a region of generally east to west-trending mountain ranges considered atypical to the predominant northwest to southeast structural fabric of California. The atypical trend of the ranges is the result of a restraining bend ("the Big Bend") on the San Andreas Fault that has rotated and compressed the region to its current configuration. The compression has resulted in folding and reverse/thrust faulting with similar east to west trends as the topography that have created broad synclinal valleys bounded by anticlinal hills. The San Fernando Valley is a synclinal valley infilled with variable thicknesses of alluvial sediment over thick sequences of marine and non-marine sedimentary rock. The Project site is underlain by unconsolidated and uncemented Holocene-age alluvial fan deposits consisting of gravel, sand, silt, and clay.

Grant High School is not located within an Alquist-Priolo Earthquake Fault Zone or over any known active or potentially active faults (see Figure 4.6-1).[51] The closest known active fault to the site is the Hollywood Fault, approximately 6.0 miles from the site. Based on the site-specific earthquake history, the potential for ground rupture due to faulting on the Project site is considered remote. The geotechnical report prepared for Grant High School recommends site-specific measures that would be incorporated into the Project design, as appropriate, to reduce the risk of seismic-related hazards. These measures include soil backfill, grading, shoring, subgrade preparations and foundations specifics, and outline the conditions under which the buildings should be constructed.[52] Furthermore, DSA approves designs for school constructions, 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, specifically 2016 CBC requirements.

50 Ninyo & Moore, Geotechnical Evaluation Ulysses S. Grant High School Modernization, May 12, 2017.
51 *Ibid.*
52 *Ibid.*

The CBC provide minimum standards to protect property and public safety by regulating the design and construction of excavations, foundations, building frames, retaining walls, and other building elements to mitigate the effect of seismic shaking and adverse soil conditions.[53]

The proposed Project will also comply with SC-GEO-1, which is a standard condition/compliance measure for seismic hazards applicable during the design and construction of projects that involve grading, excavation or other ground-disturbing activities. Compliance with the geotechnical report recommendations, DSA, and 2016 CBC requirements,[54] as well as implementation of SC-GEO-1, would ensure that potential impacts related to surface rupture from a known active fault would be less than significant. No mitigation measures or further evaluation are required.

ii) Strong seismic ground shaking?

Less Than Significant. The Project site is located within a seismically active region. Although no potentially active or active faults are known to exist within the Project site and the possibility of ground surface fault rupture at the site is considered low, the area is subject to ground motion from seismic activity in the region and has experienced such activity in the past.

Although no potentially active or active faults are known to exist within the Project site, the area is subject to ground motion from seismic activity in the region. Historical earthquakes more than magnitude 6.0 or earthquakes that caused significant loss of life and property within approximately 62 miles of the subject site are presented in Table 4.6-2.

Table 4.6-2
HISTORICAL EARTHQUAKES

Date	Name, Location, or Region Affected	Approximate Earthquake Epicenter to Project Site Distance in miles	Earthquake Magnitude
January 17, 1994	Northridge	7.4	6.7
February 9, 1971	San Fernando	16.1	6.6
October 1, 1987	Whittier Narrows	20.6	6.0
March 11, 1933	Long Beach	40.7	6.4
December 21, 1812	Los Angeles, Ventura and Santa Barbara	40.9	7.1
December 8, 1812	Wrightwood	45.7	7.3
July 22, 1899	Wrightwood	53.0	6.4

In addition to site-specific geotechnical recommendations, the proposed Project, design and construction of new buildings will comply with seismic safety requirements of the DSA and CBC. Compliance with geotechnical report recommendations, 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.

[53] LAUSD OEHS. "School Upgrade Program Final Environmental Impact Report." http://achieve.lausd.net/ceqa. Adopted by the Board of Education on November 10, 2015., page 5.1-5.
[54] 2016 CBC: Chapter 4, Codes 401.2.3, 403.9, 407.4.1; and Chapter 3, Codes 317.5, 319.

iii) Seismic-related ground failure, including liquefaction?

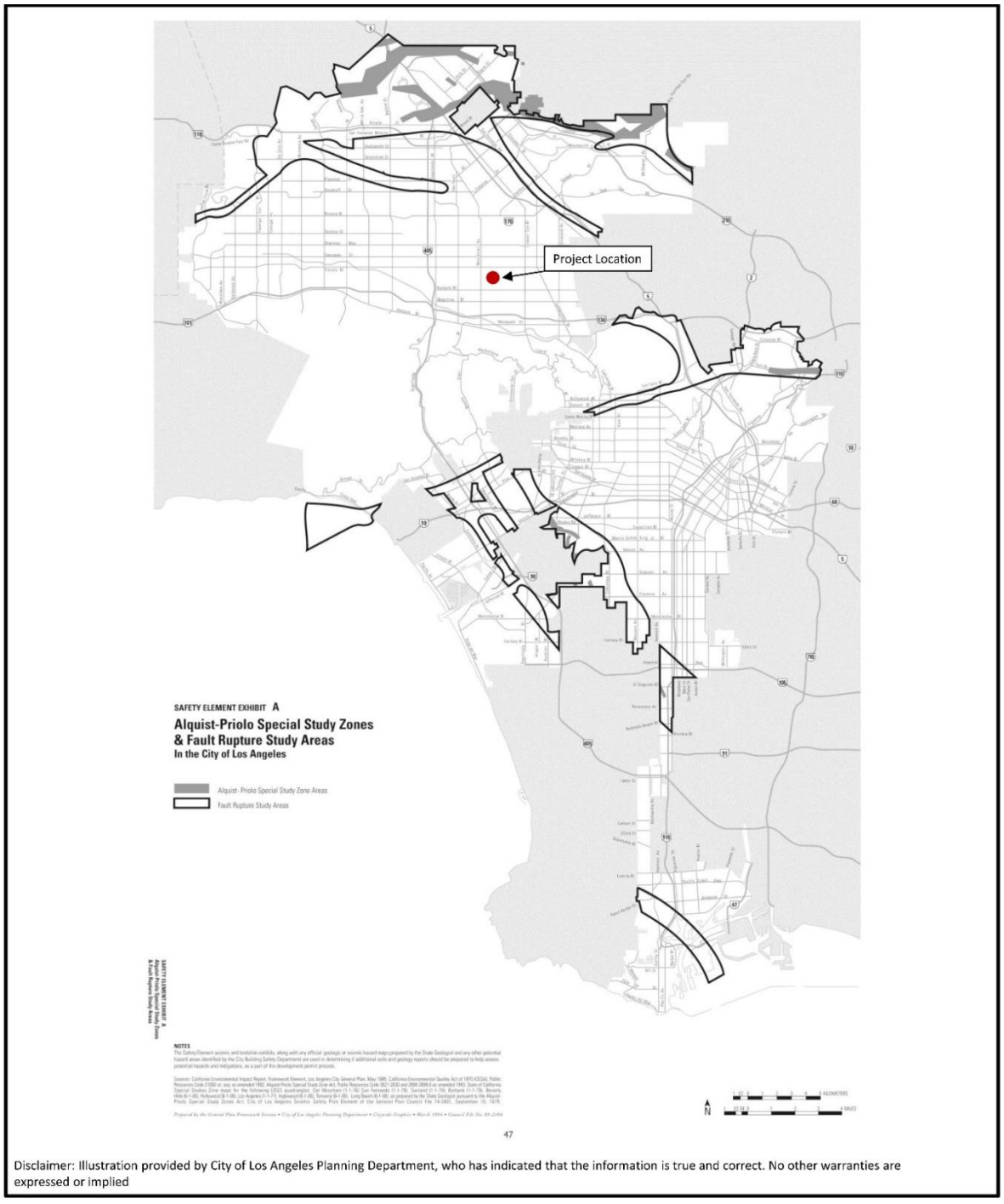
Less Than Significant. The Project site is located within a mapped seismic hazard zone for liquefaction (Figure 4.6-2).[55] Liquefaction is known generally to occur in saturated or near-saturated cohesionless soils at depths shallower than 50 feet below the ground surface. Factors known to influence liquefaction potential include composition and thickness of soil layers, grain size, relative density, groundwater level, degree of saturation, and both intensity and duration of ground shaking.

The majority of the campus is covered with buildings and asphalt that is underlain by alluvial deposits and in some areas, undocumented fill.[56] Groundwater was observed at a depth of approximately 91 feet below the Project site.[57] The historical (1944) high depth to groundwater mapped at the Project site is approximately 10 feet below the ground surface. Groundwater monitoring well data indicates that groundwater was at a depth of approximately 289 feet on November 18, 2008, in a well located approximately 0.5 mile south of the Project site. Fluctuations in the level of groundwater at the Project site may occur due to variations in ground surface topography, groundwater pumping, subsurface stratification, rainfall, irrigation practices, and other factors.

The geotechnical report recommends site-specific measures that would be incorporated into the Project design, as appropriate, to reduce the risk of seismic-related liquefaction hazards. These measures involve subgrade preparation below the proposed building footprint and use of drilled piers. In addition to site-specific geotechnical recommendations for the proposed Project, design and construction of new buildings will comply with seismic safety requirements of the DSA and CBC. Compliance with the geotechnical report recommendations, DSA and CBC requirements, as well as implementation of SCA GEO-1, would ensure that potential hazards from seismic-related ground failure, including liquefaction would be less than significant. No mitigation measures or further evaluation are required.

55 State of California, Division of Mines and Geology, Seismic Hazards Zones, Van Nuys Quadrangle, February 1, 1998.
56 Ninyo & Moore, Geotechnical Evaluation Ulysses S. Grant High School Modernization, May 12, 2017.
57 *Ibid.*

Figure 4.6-1
FAULT MAP



Source: Safety Element of Los Angeles, City General Plan, 1996

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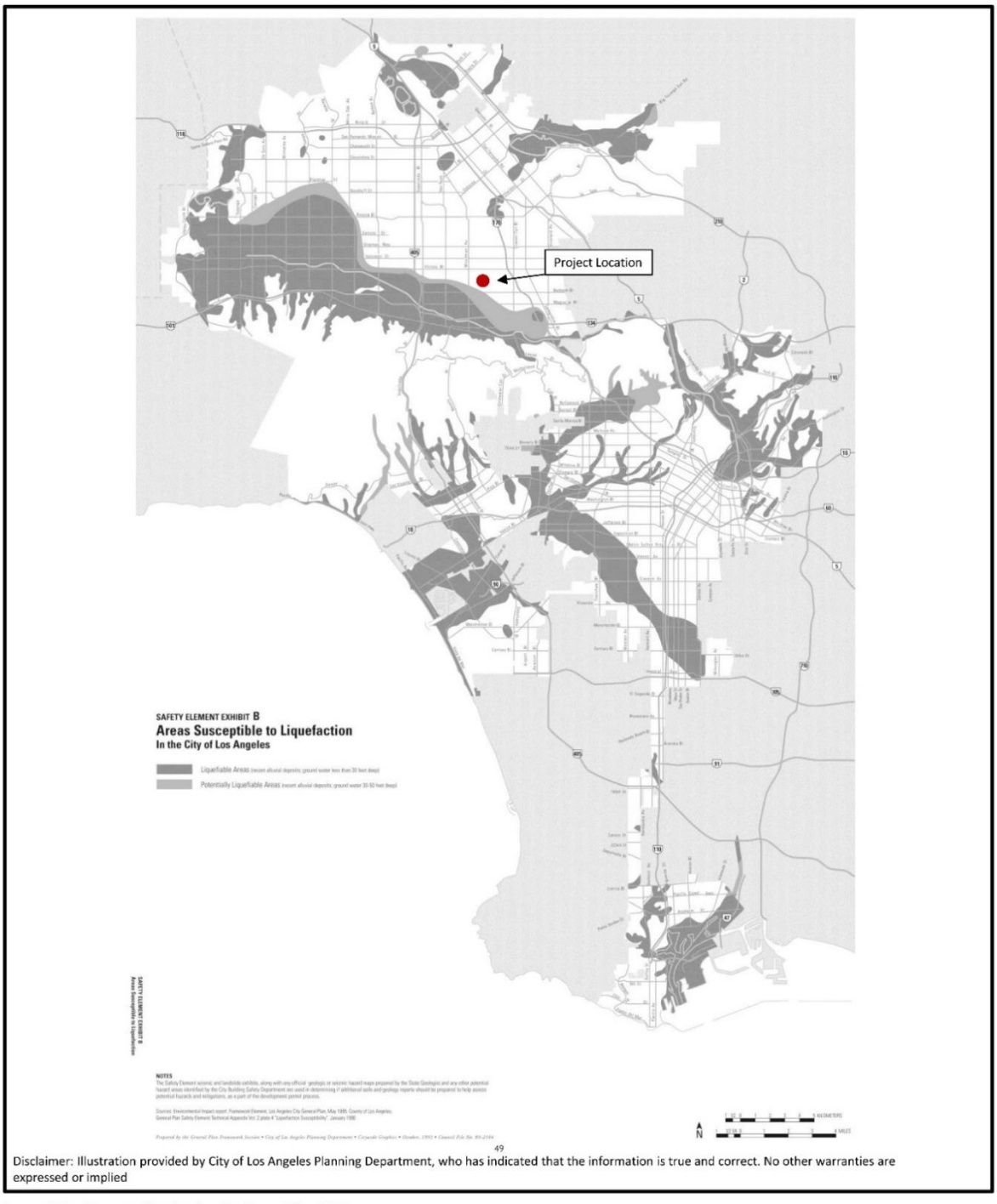
Grant High School
Comprehensive Modernization Project

Alquist-Priolo Special Study Zones &
Fault Rupture Study Areas

Figure 4.6-2
LIQUEFACTION ZONES



Disclaimer: Illustration provided by City of Los Angeles Planning Department, who has indicated that the information is true and correct. No other warranties are expressed or implied

Source: Safety Element of Los Angeles, City General Plan, 1996

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Grant High School
Comprehensive Modernization Project
Areas Susceptible to Liquefaction

iv) Landslides?

No Impact. The Project site is not located within an area identified as being susceptible to landslides, nor is the site located within a State Earthquake Induced Landslide Seismic Hazard Zone. LAUSD policy dictates that schools will not be constructed in areas that are prone to landslides. Implementation of the proposed Project would not expose people or structures to substantial adverse hazards due to landslides. No impact would occur. No mitigation measures or further evaluation are required.

b) Would the project result in substantial soil erosion or the loss of topsoil?

Less Than Significant. 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. Ground surface disturbance would occur during Project construction activities such as excavation, grading, and trenching. These activities may disturb substantial amounts of soil, resulting in the potential for soil erosion. However, this potential will be reduced through erosion control measures that would be delineated in the LAUSD Supplemental Geohazard Assessment Scope of Work (SC-GEO-1). In addition, as the proposed Project is greater than one acre, LAUSD's construction contractor would prepare and comply with a Stormwater Pollution Prevention Plan (SWPPP), which includes best management practices (BMPs) for erosion and sediment control. Compliance with SC-GEO-1 and the SWPPP would reduce impacts to soil erosion and/or the loss of top soil to less than significant levels. No mitigation measures or further evaluation are required.

c) Would the project 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?

Less Than Significant. Soils on the Grant High School campus have been previously graded and compacted, reducing the potential for collapsible soils to be present. Therefore, the proposed Project is not expected to be located on unstable collapsible soils. The potential for subsidence to occur is also minimal, since no ongoing oil or groundwater extraction is occurring in the area.[58,59] As discussed above, there is no impact related to landslides. The Project site is located within a mapped seismic hazard zone for liquefaction. As previously noted, the proposed structures may be subject to several geologic hazards, including liquefaction-induced settlement and lateral spreading. In addition to site-specific geotechnical recommendations for the proposed Project, the design and construction of new buildings will comply with seismic safety requirements of the DSA and CBC. Compliance with the geotechnical report recommendations, DSA and CBC requirements, as well as implementation of SC-GEO-1, would ensure that impacts associated with unstable geology or unstable soils, including liquefaction and lateral spreading, would be less than significant. No mitigation measures or further evaluation are required.

d) Would the project 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?

Less Than Significant. Soils on the Grant High School campus have been previously graded and compacted. The site-specific geotechnical recommendations include ground stabilization, selection of appropriate foundation type and depths, and the selection of appropriate structural systems for reducing risk associated

[58] City of Los Angeles Department of City Planning, Zoning Information and Mapping System (ZIMAS). Website: zimas.lacity.org. Accessed October 2016.

[59] Waterstone Environmental, Inc., Phase I Environmental Assessment Report, LAUSD Ulysses S. Grant High School, 13000 Oxnard Street, Los Angeles, California, July 25, 2016.

with expansive soils. Compliance with the geotechnical report recommendations, DSA and CBC requirements, as well as implementation of SC-GEO-1, would ensure that impacts associated with expansive soil would be less than significant. No mitigation measures or further evaluation are required.

e) Would the project 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?

No Impact. The proposed Project would be located on an existing school campus that is connected to the municipal sewer system. No septic tanks or alternative wastewater disposal systems would be necessary. No impact would occur. 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?	☐	☐	☒	☐

4.7.1 Summary of Impacts

The Program EIR evaluated the potential for implementation of the SUP-related site-specific Projects to contribute to greenhouse gas (GHG) emission impacts in the District. Because individually no one project is large enough to single-handedly result in a significant increase in global concentrations of GHG emissions, Project-related climate change impacts are inherently cumulative. Upon implementation of regulatory requirements and SCs, the impacts associated with GHG emissions would be less than significant.

The Program EIR includes SCs for minimizing impacts on climate change in areas where future projects would be implemented under the SUP. Applicable SCs related to climate change for the Project are listed in Table 4.7-1.

Table 4.7-1
GREENHOUSE GAS EMISSIONS STANDARD CONDITIONS OF APPROVAL

Applicable SCs	Description
SC-GHG-1	During school operation, LAUSD shall perform regular preventative maintenance on pumps, valves, piping, and tanks to minimize water loss.
SC-GHG-2	LAUSD shall utilize automatic sprinklers set to irrigate landscaping during the early morning hours to reduce water loss from evaporation.
SC-GHG-3	LAUSD shall reset automatic sprinkler timers to water less during cooler months and rainy season.
SC-GHG-4	LAUSD shall develop a water budget for landscape (both non-recreational and recreational) and ornamental water use to conform to the local water efficient landscape ordinance. If no local ordinance is applicable, then use the landscape and ornamental budget outlined by the California Department of Water Resources.
SC-GHG-5	LAUSD shall ensure that the time dependent valued energy of the proposed project design is at least 10 percent, with a goal of 20 percent less than a standard design that is in minimum compliance with the California Title 24, Part 6 energy efficiency standards that are in force at the time the project is submitted to the Division of the State Architect.
SC-USS-1	**School Design Guide.** Construction and demolition waste shall be recycled to the maximum extent feasible. LAUSD has established a minimum non-hazardous construction and demolition debris recycling requirement of 75% by weight as defined in Specification 01340, Construction & Demolition Waste Management. **Guide Specifications 2004 - Section 01340, Construction & Demolition Waste Management.** This section of the LAUSD Specifications includes procedures for preparation and implementation, including reporting and documentation, of a Waste Management Plan for reusing, recycling, salvage or disposal of non-hazardous waste materials generated during demolition and/or new construction (Construction & Demolition (C&D) Waste), to foster material recovery and re-use and to minimize disposal in landfills. Requires the collection and separation of all C&D waste materials generated on-site, reuse or recycling on-site, transportation to approved recyclers or reuse

Applicable SCs	Description
	organizations, or transportation to legally designated landfills, for the purpose of recycling salvaging and/or reusing a minimum of 75% of the C&D waste generated.

The Project-specific analysis provided in Section 4.7 concludes that implementation of the proposed Project would also have less than significant cumulative impacts on climate change.

4.7.2 Impact Analysis

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

Less Than Significant Impact. Because GHG emissions are evaluated in a global or sometimes regional context, the Project-related climate change impacts are inherently cumulative. Section 5.7.1.1 of the Program EIR contains a summary of national and state laws, regulations, plans and guidelines relevant for analyzing the impacts of GHG emissions from SUP projects. Statewide strategies to reduce GHG emissions include the Low Carbon Fuel Standard, California Appliance Energy Efficiency regulations, California Renewable Energy Portfolio standard, changes in the Corporate Average Fuel Economy standards, and other early action measures as necessary to ensure the state is on target to achieve the GHG emissions reduction goals of Assembly Bill (AB) 32.

In addition to AB 32, the California legislature passed Senate Bill (SB) 375 to connect regional transportation planning to land use decisions made at a local level. SB 375 requires the metropolitan planning organizations to prepare a Sustainable Communities Strategy (SCS) in their regional transportation plans to achieve the per capita GHG reduction targets. For the Southern California Association of Governments region, the SCS was adopted in April 2016. On April 29, 2015, Governor Brown signed Executive Order B-30-15, which sets a California GHG reduction target of 40 percent below 1990 levels by 2030.[60] In August 2016, Senate Bill 32 was passed and requires the state to reduce its greenhouse gas emissions 40 percent below 1990 levels by 2030.

Because a final Project design was unavailable, a reasonable "worst-case" scenario for the construction phase was developed. GHG emissions for each construction year were estimated with the California Emissions Estimator Model (CalEEMod), Version 2016.3.1.[61] CalEEMod is a planning tool for estimating emissions related to land use projects. Construction emission results are presented in Table 4.7-2.

60 New California Goal Aims to Reduce Emissions 40 Percent Below 1990 Levels by 2030. State of California. Office of Governor. https://www.gov.ca.gov/news.php?id=18938.

61 California Emissions Estimator Model. User's Guide, Version 2016.3.1. Prepared by Breeze Software for the California Air Pollution Control Officers Association, in collaboration with South Coast Air Quality Management District and the California Air Districts. September 2016.

Table 4.7-2
CONSTRUCTION GREENHOUSE GAS EMISSIONS FROM GRANT HIGH SCHOOL COMPREHENSIVE MODERNIZATION PROGRAM

	GHG Emissions (Metric Tons CO_2 Equivalent)			
Construction Year	**2019**	**2020**	**2021**	**2022**
Annual GHG Emissions	516	492	491	21
Total Construction Emissions	1,520			
Amortized Annual Emissions	50.7			
SCAQMD's Significance Threshold	3,000			
Exceeds Significance Threshold	**No**			

Amortized annual GHG emissions are 50.7 metric tons of CO_2 equivalent (CO_2e) per year. Given that school enrollment is projected to remain the same following the Project, and that SC-GHG-1 through SC-GHG-5, and SC-USS-1 would be incorporated to further reduce per capita GHG emissions, the net change in operational emissions would not exceed the SCAQMD's significance threshold of 3,000 metric tons per year of CO_2e. Therefore, GHG emissions will be less than significant. No mitigation measures or further evaluation are required.

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

Less Than Significant Impact. The proposed Project would generate GHG emissions from vehicle trips, energy use (indirectly from purchased electricity use and directly through fuel consumed for building heating), area sources (e.g., equipment used on-site, consumer products, coatings), water use and wastewater generation, and solid waste disposal. GHG emissions from operation of Grant High School will stay the same or decrease over the years, due to declining long-term enrollment and increased energy efficiency of the new and modernized buildings associated with the proposed Project. Additionally, SC-GHG-1 through SC-GHG-5, and SC-USS-1 would be incorporated into the proposed Project to further ensure that it will not conflict with any applicable GHG reduction plan, policy or regulation identified in the Program EIR or presented in Section 4.7.2.1. Therefore, the Project's GHG emissions impacts will be less than significant. No mitigation measures or further evaluation are required.

4.8 Hazards and Hazardous Materials

The following evaluation of hazards and hazardous materials is based, in part, on three technical reports prepared for the project: a Phase I Environmental Site Assessment ("Phase I ESA"), Preliminary Environmental Assessment (PEA), and Removal Action Workplan (RAW). The Phase I ESA, PEA and RAW, which are included in Appendix E of this Initial Study/MND, evaluate potential recognized environmental concerns ("RECs"); summarize the chemical and physical data and results of soil sampling; estimate the affected area of the site and volumes of soils affected; and propose measures to remove arsenic concentrations in the affected areas of the site to levels below regulatory screening levels for the protection of human health and the environment at Grant High School.

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?	☐	☐	☐	☒

4.8.1 Summary of Impacts

The Program EIR evaluated the potential for implementation of the SUP-related site-specific projects to have impacts associated with hazards and/or hazardous materials. Upon implementation of regulatory requirements and SCs**,** the impacts associated with hazards and hazardous materials would be less than significant.

The Program EIR includes SCs for minimizing impacts associated with hazards and/or hazardous materials in areas where future projects would be implemented under the SUP. Applicable SCs related to hazards and hazardous materials are provided in Table 4.8-1 and in Section 8.0.

Table 4.8-1
HAZARDS AND HAZARDOUS MATERIALS STANDARD CONDITION OF APPROVAL

Applicable SCs	Description
SC-AQ-1	**OEHS CEQA Specification Manual, Appendix J, Air Toxics Health Risk Assessment (HRA).** This document includes guidance on HRA protocols for permitted, non-permitted, and mobile sources that might reasonably be anticipated to emit hazardous air emissions and result in potential long-term and short-term health impacts to student and staff at the school site.

The Project-specific analysis provided in Section 4.8 concludes that implementation of the proposed Project would have less than significant impacts related to hazards and hazardous materials.

4.8.2 Impact Analysis

a) Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Less Than Significant. Construction and operation of the proposed Project would involve the transport, storage, use and/or disposal of limited quantities of hazardous materials, such as fuels, solvents, degreasers and paints. The use of these materials during Project construction would be short-term and would occur in accordance with standard construction practices, as well as with applicable federal, state, and local regulations. Potentially hazardous materials would be contained, stored, and used in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations, including but not limited to the Resource Conservation and Recovery Act (RCRA); Comprehensive Environmental Response, Compensation, and Liability Act; California hazardous waste control law;[62] Occupational Safety and Health Administration (OSHA), Los Angeles County Fire Authority, and the Los Angeles County Health Care Agency requirements. Examples of such activities include fueling and servicing construction equipment, applying paints and other coatings, and demolishing buildings that contain asbestos or lead-based paint. Proposed project construction would be temporary, and onsite activities would be governed by existing regulations of several agencies.

The Phase I ESA revealed the following RECs (as that term is defined in the American Society for Testing and Materials (ASTM) Standard Practice E1527-00) in connection with the Site**.**

Onsite RECs

- Hydraulic lifts – Two underground hydraulic lifts (auto hoists) were historically located in the auto shop building. The auto shop was not accessible during the Phase I site investigation; therefore, the presence or absence of the auto hoists was not confirmed. There is a potential for leaking hydraulic oil to have impacted soil in the area of these lifts.
- Oil/water separator – An oil/water separator is located in the shop yard area and is connected to floor drains located in the automotive repair shop. There is a potential for impacts to the subsurface due to leakage from this oil/water separator.
- Historical shop area – The shop yard area was formerly occupied by a shop building that included an electrical shop and auto repair shop. There is a potential that underground storage tanks (USTs) or other structures associated with these shops remain under the asphalt paved yard area.

62 Codified in California Health and Safety Code, Division 20, Chapter 6.5, Hazardous Waste Control.

- The north-western corner of the site is currently used as a garden and includes a greenhouse and appears to have been used since before 1970. Given this timeframe, organochlorine pesticides may have been used in this area.
- Given findings at similar LAUSD school sites, there is a potential for arsenates in shallow soils beneath the asphalt pavement of the Project site from past application of arsenic-based herbicides.
- Due to the age of the structures onsite, there is potential for lead, arsenic, and organochlorine pesticides (OCPs) in the soil.
- Due to their age, many of the buildings may contain asbestos-containing materials (ACM) and lead based paint (LBP).
- Two three-stage clarifiers were observed near the arts classroom, science classroom, and the boiler room.
- PCB-containing light ballasts removed from the school were stored in the custodial building.
- Approximately 20 transformers are located throughout the school.

Sampling results indicated that OCPs, PCBs, total petroleum hydrocarbons, and VOCs were below screening levels. Soils impacted by lead and arsenic were removed for the site on August 9, 2017 and transported to an authorized waste disposal facility.[63]

The following items do not meet the ASTM definition of a REC, however, are noted as part of this analysis of potential hazards as it relates to the Project:

The Phase I ESA specifically noted that based on the age of the onsite structures, it is probable that ACMs and/or LBP are present in the building at Grant High School. Any activity that involves cutting, grinding, or drilling during building renovation or demolition, or involves relocation of underground utilities, could release friable asbestos fibers unless proper precautions are taken. The federal Clean Air Act regulates asbestos as a hazardous air pollutant, which subjects it to regulation by the SCAQMD under its Rule 1403. The federal OSHA also regulates asbestos as a potential worker safety hazard. The Asbestos-Containing Materials in Schools Rule (CFR Title 40, Part 763, Subpart E), promulgated under the federal Asbestos Hazard Emergency Response Act (AHERA), requires local education agencies to inspect their school buildings for asbestos-containing building material, prepare asbestos management plans, and perform asbestos response actions to prevent or reduce asbestos hazards. AHERA also tasked the Environmental Protection Agency with developing a model plan for states for accrediting persons conducting asbestos inspection and corrective-action activities at schools.

Prior to demolition or renovation of any of Grant High School's existing buildings, any ACM or LBP must be identified and abated. The District provides a complete protocol for the handling of ACMs, including required procedures whenever ACM would be disturbed, in compliance with federal and state regulations.[64] Compliance with asbestos-related regulations and requirements is the responsibility of LAUSD's Facilities Environmental Technical Unit (FETU), which (1) identifies ACM, (2) abates ACM (including repair and removal of asbestos), and (3) prepares project-specific contract specifications and inspections.[65] The District maintains a list of school-owned buildings that could contain ACM, and all projects at existing schools must be reviewed for potential impacts to ACM prior to project commencement. Due to their age, many of the Grant High School buildings may contain ACM. All materials that contain ACM would be removed by licensed asbestos abatement contractors following specific handling procedures. In addition, the District's Standard Specification Section

63 Civil-Environmental Survey Group. 2017. PEA Equivalent Report. Ulysses S. Grant Senior High School, 13000 Oxnard Street, Los Angeles, CA 91401.
64 LAUSD Facilities School Maintenance and Operations Repair & Construction Safety Standards, February 28, 2013.
65 LAUSD Office of the Inspector General, Report of Audit, Asbestos Technical Unit, October 2, 2001.

13280, Asbestos Abatement and Asbestos Related Disturbance, November 21, 2003, will be implemented as needed.[66]

Various Grant High School buildings may also contain LBP. All projects at existing school sites must be reviewed by LAUSD's FETU for impacts from LBP prior to project commencement, as all coated surfaces (paint, varnish, or glazed) are assumed to contain lead, removal of which must be performed by properly trained and licensed contractors. Specific procedures for handling building materials containing LBP have been established by the District. In addition, LAUSD Section 13282, Lead Abatement and Lead Related Construction Work, March 15, 2007, and LAUSD Section 13614, Abatement of Hazardous Materials, July 7, 2003, will be implemented as appropriate.

There is also potential for hydraulic oil, lead, arsenic, PCBs, and organochlorine pesticides in the soil. If contaminated soil is found on the project site, the soil will be remediated to the satisfaction of the LAUSD-OEHS and/or the DTSC. The removal or remedial action would be conducted in accordance with federal and state requirements governing hazardous materials excavation, onsite handling, and offsite transport to minimize potential exposures to construction workers and the general public.

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[67] and LAUSD Design Standards, Specification Document 02 8400 Polychlorinated Biphenyl (PCB) Remediation, Rev 3.0, Revised February 1, 2017[68]

There is a potential that USTs or other structures associated with the shop yard area may remain under the asphalt paved yard area. In the event a UST is discovered, it would be left in place and cordoned off, and work in the vicinity of the UST would cease immediately. The contractor would notify the District, who in turn would notify the local Certified Unified Program Agency (CUPA) in charge of UST programs. The CUPA for the Project site is the Los Angeles Fire Department.[69] The UST would be registered and a permit would be obtained for its removal. Once the UST was removed, soil samples would be collected under agency oversight to determine whether there had been a release of the tank contents. If a release were identified, it would be remediated under CUPA, DTSC, and/or Los Angeles Regional Water Quality Control Board (RWQCB) oversight, as appropriate. These activities would continue until a "no further action" letter had been received from the responsible agency.

Post Project construction, the types of hazardous materials associated with operation of the proposed Project would generally be limited to those associated with janitorial, maintenance, and repair activities, such as commercial cleansers, paints, aerosol cans, lubricants, and automotive supplies. There would be no increase in these activities over existing condition levels as the proposed Project would not expand capacity. The amounts and use of these materials would be limited, and the transport, storage, use, and disposal of these materials would be subject to federal, state, and local health and safety requirements. Such requirements would be incorporated into the design and operation of the Project, such as providing for and maintaining appropriate storage areas for hazardous materials and installing or affixing appropriate warning signs and labels.

66 LAUSD, Facilities Services Division. Asset Management: Guide Specifications - Divisions 02 – 25, Specifications - Division 13 (Special Construction), 13280 Asbestos Abatement & Asbestos Related Disturbance, November 21, 2003
67 Available at http://achieve.lausd.net/Page/3495
68 Available at http://achieve.lausd.net/Page/3495
69 LAUSD School Upgrade Program Draft EIR, June 2014, page 5.8-39.

Compliance with applicable laws and regulations during construction and operation would ensure that impacts associated with routine transport, use, or disposal of hazardous materials, are less than significant. No mitigation measures or further evaluation are required.

b) Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Less Than Significant. As discussed in checklist item (a), the use of hazardous materials in small quantities may be required during construction and operation of the proposed Project. 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. Additionally, if contaminants that could become airborne during demolition and hauling (ACM, LBP, or pesticides) are present on the Project site, they would be removed in accordance with DTSC and SCAQMD requirements including, but not limited to SCAQMD Rule 1403; Asbestos-Containing Materials in Schools rule (CFR Title 40, Part 763, Subpart E); LAUSD § 13280: Asbestos Abatement and Asbestos Related Disturbance; LAUSD § 13282: Lead Abatement and Lead Related Construction Work; and LAUSD § 13614: Abatement of Hazardous Materials prior to demolition activities. The construction activities would incorporate LAUSD's standard practices and BMPs, which include, but are not limited to, ensuring that trucks and construction vehicles, particularly those carrying hazardous materials, avoid scheduling deliveries at the beginning and end of the school day. Additionally, work activities would be coordinated with the campus administration to avoid potential conflicts or instances involving hazards and hazardous materials. Further, the District would continue to comply with federal and state laws and existing campus programs, practices, and procedures to eliminate or reduce the consequences of hazardous materials accidents. This would include affixing appropriate warning signs and labels, installing emergency wash areas, providing well-ventilated areas and special plumbing, and maintaining adult supervision. Compliance with applicable laws, regulations and standard LAUSD policies and practices during Project construction and operation would ensure that impacts associated with upset or accident conditions which could cause a release of hazardous materials into the environment are less than significant. No mitigation measures or further evaluation are required.

c) Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

Less Than Significant. In addition to Grant High School, the campus also houses a Communications Technology Magnet Center, the Jack London Continuation High School, and a Community Day School. Los Angeles Valley College is located adjacent to the Project site to the west and south. The Maggie Hayes School and Village Glen School are both located within one-quarter mile of the Project site. The proposed Project is school-related and would not emit hazardous emissions or handle significant quantities of hazardous or acutely hazardous materials, substances, or waste. Hazardous materials expected at the Project site would be associated with janitorial, maintenance, and repair activities. These materials would be used in small quantities and would be stored in compliance with established state and federal requirements. Additionally, if contaminants that could become airborne during demolition and hauling (ACM, LBP, or pesticides) are present on the Project site, they would be removed in accordance with DTSC and SCAQMD requirements prior to demolition activities. Therefore, emissions impacts on existing schools within 0.25 mile would be less than significant. No mitigation measures or further evaluation are required.

d) Would the project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code § 65962.5 or a list of hazardous substance release sites identified by the state Department of Health Services pursuant to § 25356 of the Health

& Safety Code and, as a result, would it create a significant hazard to the public or the environment?

No Impact. Grant High School is listed as a hazardous waste generator on the HAZNET and EPA RCRAInfo databases for generation and disposal of hazardous waste, with no violations reported. School facilities typically have disposed of small quantities of hazardous wastes in the past, such as chemicals from science, shop, and photography classes and waste generated during routine campus maintenance. However, none of the database listings qualifies the proposed Project site as a hazardous materials site pursuant to Government Code § 65962.5, and the site is not on a list of hazardous substance release sites identified by the state Department of Health Services pursuant to § 25356 of the Health & Safety Code.[70] Therefore, no impacts would occur. No mitigation measures or further evaluation are required.

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

No Impact. The Burbank (Bob Hope) Airport is located approximately 3.5 miles northeast of the Grant High School, Van Nuys Airport is located approximately 4.5 miles northwest of the campus, and the Whiteman Airport is located approximately 5.5 miles north of the campus. The flight patterns for landings and take-offs from the three airports are not in the general vicinity of Grant High School, and do not cross over the campus (Figure 4.8-1). The Project site is not located in the airport influence areas for these three airports.[71] Therefore, no impacts would occur. No mitigation measures or further evaluation are required.

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?

No Impact. The Project site is not located within the vicinity of a private airstrip, or heliport or helistop. Grant High School is an existing campus; therefore, the proposed Project would not create any new safety hazards associated with a private airstrip, or heliport/helistop operations, and no impacts would occur in this regard. No mitigation measures or further evaluation are required.

g) Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

No Impact. Grant High School is located in a developed urban area with an existing roadway network. The campus is not located along a roadway designated as a "selected disaster route."[72] The proposed Project does not include any uses or design features that would result in interference with any adopted emergency response plan or emergency evacuation plan. Staging areas for construction would be located on school property; therefore, emergency access to the site would not be adversely impacted during construction. The proposed Project would not impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan, and no impacts would occur in this regard. No mitigation measures or further evaluation are required.

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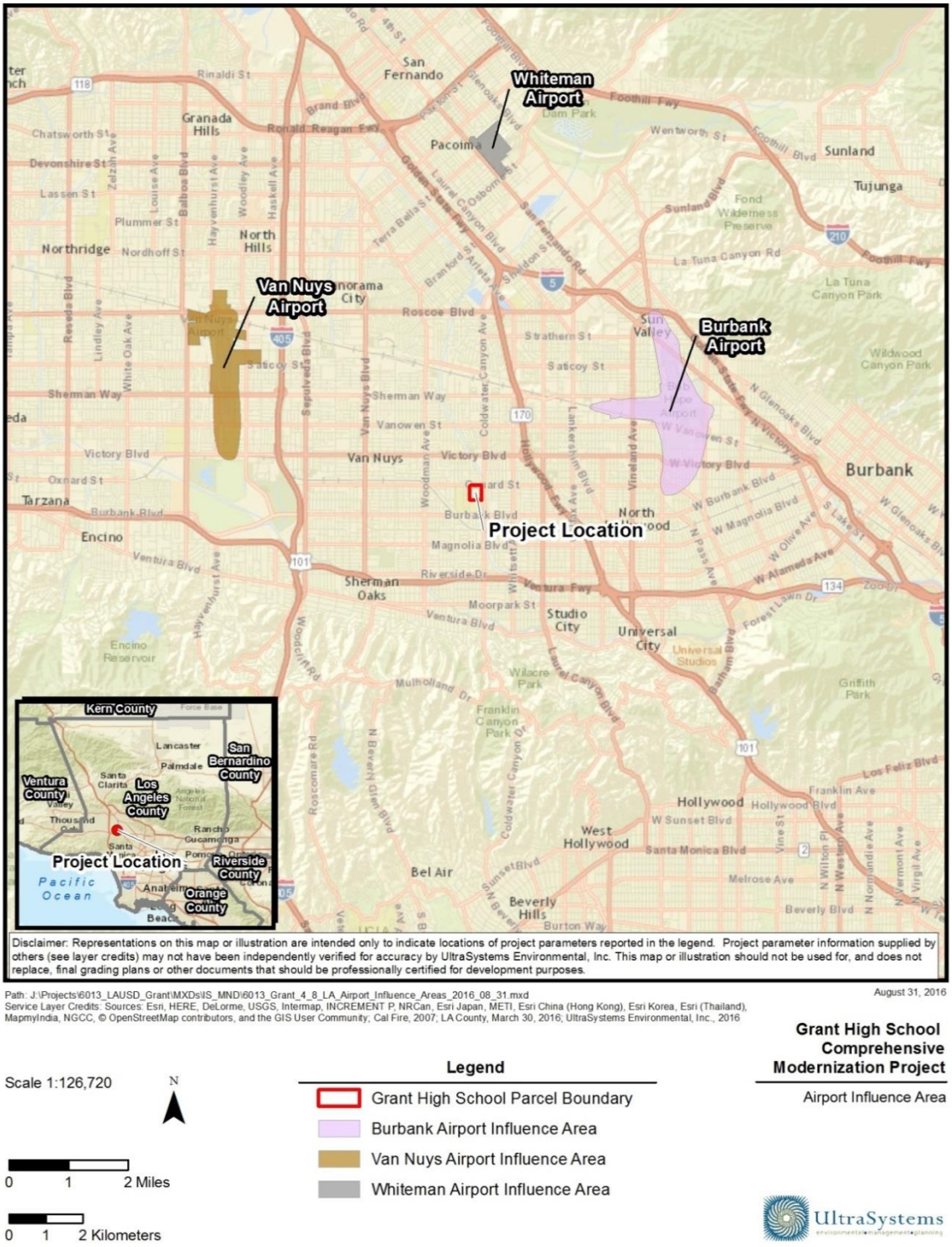
70 Waterstone Environmental, Inc., Phase I Environmental Assessment Report, Ulysses S. Grant Senior High, 13000 Oxnard Street, Los Angeles, California 91401, July 25, 2016.

71 Airport Land Use Commission (ALUC), Los Angeles County. Van Nuys Airport and Bob Hope Airport Influence Areas. May 13, 2003.

72 City of Los Angeles Department of Planning, General Plan Safety Element, Exhibit H – Critical Facilities and Lifeline Systems in the City of Los Angeles, November 26, 1996.

Figure 4.8-1
NEAREST AIRPORTS



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?

No Impact. Grant High School is located in a developed urban area and is not located within a Wildfire Hazard Area as identified by the City of Los Angeles. The proposed Project would not expose people or structures to a significant risk involving wildland fires, and no impact would occur in this regard. No mitigation measures or further evaluation are required.

4.9 Hydrology and 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?	☐	☐	☐	☒

4.9.1 Summary of Impacts

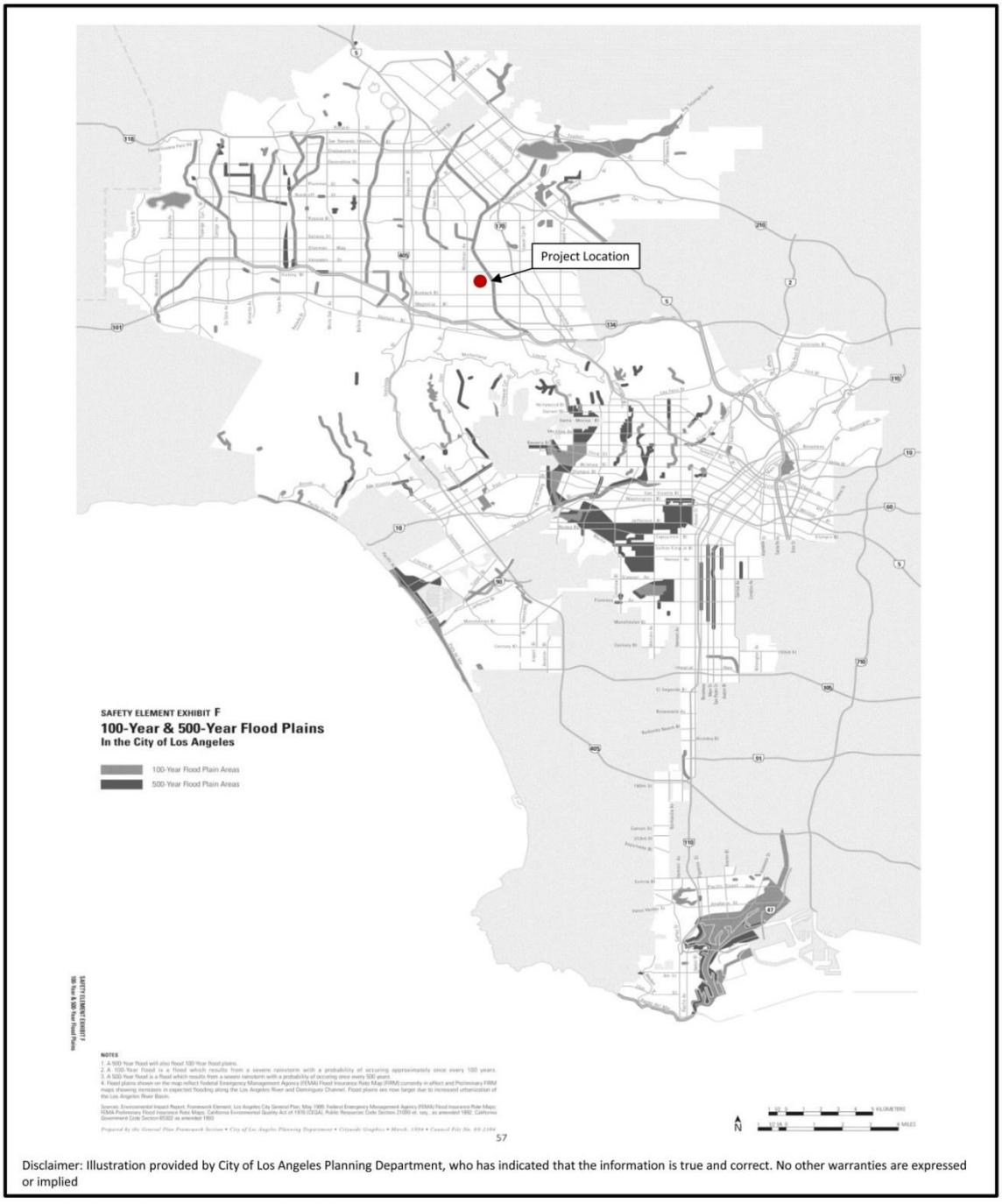
The Program EIR evaluated the potential for implementation of the SUP-related site-specific projects to have impacts associated with hydrology and water quality. Upon implementation of regulatory requirements and SCs, the impacts associated with hydrology and water quality would be less than significant.

The Program EIR includes SCs for minimizing impacts on hydrology and water quality in areas where future projects would be implemented under the SUP. Applicable SCs related to hydrology and water quality are provided in Table 4.9-1 and in Section 8.0. These include SCs for minimizing potential Project-specific impacts related to hydrology and water quality.

Table 4.9-1
HYDROLOGY AND WATER QUALITY STANDARD CONDITIONS OF APPROVAL

Applicable SCs	Description
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 post-construction element of the NPDES program requirements.
SC-HWQ-2	**Compliance Checklist for Storm Water Requirements at Construction Sites.** This checklist has requirements for compliance with the General Construction Activity Permit and is used by OEHS to evaluate permit compliance. Requirements listed include a SWPPP; BMPs for minimizing storm water pollution to be specified in a SWPPP; and monitoring storm water discharges to ensure that sedimentation of downstream waters remains within regulatory limits
SC-HWQ-3	**Miscellaneous Requirements** Environmental Training Curriculum Hazardous Waste Management Program Medical Waste Management Program Environmental Compliance Inspections Safe School Inspections Integrated Pest Management Program Fats Oil and Grease Management Program Solid Waste Management Program

Figure 4.9-1
100-YEAR AND 500-YEAR FLOOD PLAINS



Source: Safety Element of Los Angeles, City General Plan, 1996

UltraSystems
environmental management planning

Grant High School
Comprehensive Modernization Project
100-Year and 500-Year Flood Plains

4.9.2 Impact Analysis

a) Would the project violate any water quality standards or waste discharge requirements?

Less Than Significant. The proposed Project would require grading and other construction activities that could result in the deterioration of water quality if sediments or construction-related pollutants wash into the surface water system. Earthwork activities associated with the proposed Project would disturb more than one acre. For construction sites of one acre or more, LAUSD contractors must prepare a Permit Registration Document demonstrating compliance and coverage under the Los Angeles RWQCB General Permit for Stormwater Discharges Associated with Construction and Land Disturbance Activities (Order No. 2012-0006-DWQ; National Pollutant Discharge Elimination System (NPDES) No. CAS000002).[73]

The District has a program-wide SWPPP developed in 2005, updated in 2007, and again in 2009.[74] The program-wide SWPPP, developed in consultation with the Los Angeles RWQCB, ensures that the aggregate stormwater runoff from school construction projects does not create a condition of pollution, contamination, or nuisance as defined in California Water Code Section 13050. The proposed Project would also be required to comply with local ordinances and local erosion and sediment control requirements, including the City of Los Angeles' Low Impact Development Ordinance (LID).[75] The proposed Project would be completed in accordance with LAUSD SCs and applicable regulations pertaining to stormwater runoff, including:

- Preparing and implementing sediment and erosion control plan that follows the BMPs outlined by the State Water Resources Control Board to comply with the Construction General Permit.
- Developing and implementing a project-specific SWPPP, with BMPs, as required by RWQCB NPDES regulations.
- Discharging water accumulated within the construction excavation pits in accordance with BMPs and a dewatering plan that must be developed and approved prior to construction as part of the NPDES Construction General Permit.
- Preventing construction-related sediment flows from entering storm drainage systems by constructing temporary filter inlets around existing storm drain inlets prior to the stabilization of construction site areas.
- Compliance with SC-HWQ-1, SC-HWQ-2, and SC-HWQ-3.

The proposed Project will follow the LAUSD Stormwater Technical Manual design requirements and guidelines for 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. While these guidelines were developed in 2009 in anticipation of a forthcoming NPDES Phase II MS4 Permit, they are intended to meet current post-construction Standard Urban Stormwater Mitigation Plan (SUSMP) requirements in a manner appropriate for LAUSD. Specifically, the guidelines in the manual address the mandated post-construction element of the NPDES program requirements enforced by the Los Angeles RWQCB in the Los Angeles Region.[76]

The proposed Project may create additional sources of non-point source or stormwater pollution from vehicular-related contaminants washing into the drainage system during wet weather. However, the Project

73 LAUSD School Upgrade Program Draft EIR, page 5.9-7, September 2015.
74 LAUSD School Upgrade Program Draft EIR, page 5.9-26, September 2015.
75 City of Los Angeles. LA Stormwater. Standard Urban Stormwater Mitigation Plan. http://www.lastormwater.org/green-la/low-impact-development/. Accessed March 9, 2017.
76 LAUSD School Upgrade Program Draft EIR, page 5.9-12, September 2015.

involves replacing and improving existing uses and pervious and impervious ground coverage and would be constructed in areas that already produce non-point source pollutants. The LAUSD Stormwater Technical Manual guidelines are intended to ensure that appropriate stormwater reduction and treatment elements are included in SUPs to the maximum extent practicable.[77] LAUSD's stormwater runoff control programs and SCs, including SC-HWQ-1 through SC-HWQ-3, would further avoid potential impacts associated with proposed Project construction and operation activities, and therefore the Project would not violate any water quality standards or waste discharge requirements. Impacts would be less than significant. No mitigation measures or further evaluation are required.

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

Less Than Significant. The proposed Project would not result in any substantial changes in the quantity of groundwater supplies. No groundwater extraction activities would occur, and no wells would be constructed. The Project site currently contains impervious surfaces. It is expected that the amount of impervious surfaces of the proposed Project site would be similar to existing conditions; therefore, there would not be a decrease in percolation of water from the site into groundwater because of new impervious surfaces. In addition, Project design features would include mechanisms to control runoff from the newly impervious areas, and promote onsite percolation. The proposed Project would not significantly impact groundwater recharge capability.

The proposed Project is not growth inducing and the Project site is not a groundwater recharge location and therefore, would not result in a new or increased demand for groundwater.

Compliance with applicable laws, regulations, and LAUSD SCs including SC-HWQ-1 through SC-HWQ-3 during Project construction and operation would ensure that impacts associated with groundwater supplies are less than significant. No mitigation measures or further evaluation are required.

c) Would the project 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?

Less Than Significant. The Project site is currently developed and located in an urbanized area with established drainage patterns. There are no streams or rivers on the Project site, however, the concrete channelized Tujunga Wash,[78] a major tributary of the Los Angeles River, runs adjacent to the eastern border of the Project site. The existing drainage pattern on the Project site may be improved as a result of the proposed Project. LAUSD standard practices requires collection of stormwater runoff, compliance with applicable NPDES stormwater permit requirements, restricting sediment flows into storm drainage systems, and compliance with the District's Stormwater Technical Manual. During construction, disturbance of soil could lead to an increased potential for wind and water erosion. However, soil disturbance would be controlled with implementation of a site-specific SWPPP and utilization of applicable BMPs during construction activities. The operational phase of the proposed Project will incorporate, as feasible, features outlined in the LAUSD Technical Manual to reduce the impact of erosion and siltation. Compliance with applicable laws and regulations, including LID requirements, and SC-HWQ-1 through SC-HWQ-3 during Project siting, construction and operation would ensure impacts associated with alteration of the drainage pattern that could

[77] LAUSD School Upgrade Program Draft EIR, page 5.9-26, September 2015.
[78] Ninyo & Moore, Geotechnical Evaluation Ulysses S. Grant High School Modernization, May 12, 2017, page 2.

result in substantial erosion or siltation on- or off-site, are less than significant. No mitigation measures or further evaluation are required.

d) Would the project 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?

Less Than Significant. Grant High School is located in the Los Angeles Watershed which spans 830 square miles of western, central, and southern Los Angeles County and some small areas of eastern Ventura County. The watershed extends from the San Gabriel Mountains on the northeast, to the Santa Susana Mountains and Santa Monica Mountains on the northwest and west, respectively, and extends south to the mouth of the Los Angeles River in the City of Long Beach. The watershed includes all of the San Fernando Valley, much of central Los Angeles, and parts of south Los Angeles. The Los Angeles River, the primary stream in the watershed, extends 48 miles from the confluence of Bell Creek and the Arroyo Calabasas in the southwest San Fernando Valley to the Pacific Ocean at the City of Long Beach.[79]

Grant High School is underlain by the San Fernando Valley Groundwater Basin. The San Fernando Valley Groundwater Basin includes the water-bearing sediments beneath the San Fernando Valley, Tujunga Valley, Browns Canyon, and the alluvial areas surrounding the Verdugo Mountains near La Crescenta and Eagle Rock. The basin is bound on the north and northwest by the Santa Susana Mountains, on the north and northeast by the San Gabriel Mountains, on the east by the San Rafael Hills, on the south by the Santa Monica Mountains and Chalk Hills, and on the west by the Simi Hills.[80]

Runoff from the Project site currently discharges into the surrounding street storm drains. While the Project site is under construction, the rate and amount of surface runoff generated could fluctuate. However, the construction period is short-term, and incorporation of SC-HWQ-1 through SC-HWQ-3 and compliance with the applicable regulations would limit or eliminate the potential for the Project to result in flooding.

Following construction of the proposed Project, surface water runoff would continue to drain into the existing drainage system. Existing drainage patterns and the amount of impervious surfaces are not expected to change significantly; therefore, implementation of the proposed Project would not result in a significant increase in stormwater runoff from the site. The proposed Project would not increase the risk of flooding in the surrounding area. LAUSD's construction contractor will comply with applicable ordinances regulating drainage improvements and grading plans as they relate to construction of on-site improvements that affect drainage. Compliance with applicable laws, regulations, including LID requirements and SC-HWQ-1 through SC-HWQ-3, during proposed Project construction and operation would ensure that impacts associated with drainage and flooding are less than significant. No mitigation measures or further evaluation are required.

e) Would the project 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?

Less Than Significant. The proposed Project design would include provisions to control surface runoff in compliance with the requirements of applicable NPDES permits and Standard Urban Stormwater Mitigation Plans. During construction, stormwater BMPs would be implemented to accommodate site runoff so that it would not adversely impact downstream storm drain facilities or provide substantial additional sources of

[79] LAUSD School Upgrade Program Final EIR, September 2015, page 5.9-14.
[80] Waterstone Environmental, Inc., Phase I Environmental Assessment Report, LAUSD Ulysses S. Grant High School, 13000 Oxnard Street, Los Angeles, California, July 25, 2016.

polluted runoff. In addition, California Government Code § 53097 requires school districts to comply with city and county ordinances regulating drainage improvements and requiring review and approval of grading plans as they relate to design and construction of on-site improvements that affect drainage. Compliance with § 53097 would ensure the proposed Project would not have a significant adverse effect on the local drainage system. Implementation of engineered drainage improvements and compliance with applicable laws, regulations, and LAUSD SC-HWQ-1 through SC-HWQ-3 during Project construction and operation would ensure that impacts to existing or planned stormwater drainage systems are less than significant. No mitigation measures or further evaluation are required.

f) Would the project otherwise substantially degrade water quality?

Less Than Significant. The proposed Project would require grading and other construction activities that may cause deterioration of water quality if sediments or construction-related pollutants wash into the storm drain system. During construction, the proposed Project may create additional sources of non-point source or stormwater pollution from vehicular-related contaminants washing into the drainage system during wet weather. However, the proposed Project involves replacing existing uses and pervious and impervious ground coverage with improved facilities and would be constructed in areas that already produce non-point source pollutants. LAUSD incorporates construction BMPs into all new construction projects, and District construction contractors would comply with NPDES regulations and prepare a SWPPP. Implementation of LAUSD's stormwater runoff control programs and SCs, including SC-HWQ-1 through SC-HWQ-3, would further avoid potential impacts to water quality associated with proposed Project construction and operation activities; therefore, impacts would be less than significant. No mitigation measures or further evaluation are required.

g) Would the project 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?

No Impact. No residential development is planned as part of the proposed Project and the Project site is not located within a 100-year flood hazard area.[81] The campus is located in an area classified by FEMA as Zone X, which means the area has a less than a 0.2% annual probability of flooding. In addition, the site is not within a City of Los Angeles Safety Element Inundation Zone. Thus, there would be no impact in this regard. No mitigation measures or further evaluation are required.

h) Would the project place within a 100-year flood hazard area structures which would impede or redirect flood flows?

No Impact. As described above in Checklist Question (g), the Project site is not located within a within a 100-year flood hazard area. Thus, there would be no impact in this regard. No mitigation measures or further evaluation are required.

[81] LAUSD School Upgrade Program Final EIR, September 201, page 5.9-21.

i) Would the project 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, or dam inundation?

Less Than Significant. The Project site is not located within a 100-year flood hazard area,[82] but is within a City of Los Angeles Safety Element Inundation Zone[83] for the Sepulveda Dam, Hansen Dam and Pacoima Dam.[84, 85] Pursuant to the California Water Code, the California Division of Safety of Dams oversees the design and construction of dams and conducts yearly inspections to ensure that the dams are performing and maintained in a safe manner. The primary purpose of Sepulveda am, Hansen Dam and Pacoima Dam is for flood risk management. Most of the year, Sepulveda Dam and Hansen Dam do not hold water, only holding water temporarily after storm events (usually December through March).[86, 87] Therefore, the likelihood that at the time of an earthquake there would be enough water impounded by the dams to cause a substantial risk of flooding in the project area due to dam failure is very low, and impacts associated with dam failure are less than significant.

In addition to flood risk management, Pacoima Dam holds water for groundwater recharge. Pacoima Dam has been retrofitted to the California Division of Safety of Dams (DSOD) standards to withstand seismic events.[88] The Los Angeles County Flood Control District will be removing sediment from the Dam to restore flood control and water conservation capacity to facilitate the reservoir being drained quickly drained in a major seismic event. Therefore, the likelihood of the Dam failing at the time of an earthquake is very low, and impacts associated with dam failure are less than significant.[89] While the Project site is within the inundation boundaries for the Sepulveda Dam, the probability of inundation to occur due to failure at the Sepulveda Dam would be extremely low Therefore, impacts would be less than significant in this regard. No mitigation measures or further evaluation are required.

j) Would the project cause inundation by seiche, tsunami, or mudflow?

No Impact. A seiche is an oscillating wave in a closed or partially closed water body such as a river, lake, reservoir, pond, and other large inland water body caused by wind, tidal forces, earthquakes, landslides and other phenomena. As discussed above, Sepulveda Dam and Hansen Dam do not hold water most of the year. In addition, Sepulveda Dam is located over three miles and Hansen Dam is located over five miles from the Project site. Pacoima Dam is located over 10 miles from the Project site. As these Dams are not located in the immediate vicinity of the Project site, hazards from a seiche are considered negligible

Mudflows occur as a result of downslope movement of soil and/or rock under the influence of gravity. There are no nearby slopes which could release mud or rock onto the project site, so there is no potential for a

82 FEMA, Flood Insurance Rate Map, Los Angeles County, California, Map Number 06037C1320F, Effective Date September 26, 2008.
83 City of Los Angeles Department of Planning, General Plan Safety Element, Exhibit G – Inundation and Tsunami Hazard Areas in the City of Los Angeles, November 26, 1996.
84 LAUSD School Upgrade Program Final EIR, September 2015, page 5.9-20.
85 Waterstone Environmental, Inc., Phase I Environmental Assessment Report, Ulysses S. Grant Senior High, 13000 Oxnard Street, Los Angeles, California 91401, July 25, 2016.
86 U.S. Army Corps of Engineers, Hansen Dam Basin, Master Plan and Environmental Assessment, September 2011, Page 7-1.
87 U.S. Army Corps of Engineers, Sepulveda Dam Basin, Master Plan and Environmental Assessment, September 2011, Page 7-1.
88 Los Angeles County Department of Public Works, Pacoima Reservoir Project website https://dpw.lacounty.gov/wrd/Projects/Pacoima/display.cfm?Project=FAQ accessed October 12, 2017.
89 LAUSD School Upgrade Program Final EIR, September 2015, page 5.9-20.

mudflow to affect the site. The Project site is not located within a tsunami hazard zone.[90] Thus, there would be no impact in this regard. No mitigation measures or further evaluation are required.

[90] City of Los Angeles Department of Planning, General Plan Safety Element, Exhibit G – Inundation and Tsunami Hazard Areas in the City of Los Angeles, November 26, 1996.

4.10 Land Use and 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?	☐	☐	☐	☒

4.10.1 Summary of Impacts

The Program EIR evaluated the potential for implementation of SUP-related projects to impact existing land uses in the LAUSD area and conflict with applicable land use plans, policies and regulations, including habitat or wildlife conservation plans.

According to the Program EIR, projects implemented under the SUP are anticipated to have less than significant impacts on land use and planning. Therefore, the Program EIR does not include SCs for minimizing impacts on land use and planning.

The Project-specific analysis provided in Section 4.10 concludes that implementation of the proposed Project would have no impacts related to land use and planning.

4.10.2 Impact Analysis

a) Would the project physically divide an established community?

No Impact. The proposed Project includes modernization of an existing developed school campus and would be entirely located within the school boundaries. Projects on existing school campuses are an integral part of the community and therefore do not divide established communities surrounding the schools. No impact would occur. No mitigation measures or further evaluation are required.

b) Would the project 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?

No Impact. The proposed Project is located on the existing Grant High School campus, within the community of Valley Glen in the southeastern portion of the San Fernando Valley part of the City of Los Angeles. The proposed Project is located within the Van Nuys – North Sherman Oaks Community Plan Area. According to the Van Nuys–North Sherman Oaks Community Plan, there is a continuing need for the modernizing of public facilities to improve services and accommodate changes in the Van Nuys-North Sherman Oaks Community Plan.[91]

The Project site is zoned PF (Public Facilities) by the City of Los Angeles, and has a corresponding General Plan land use designation of Public Facilities. The PF zone allows development of public elementary and secondary schools. The City's General Plan land use designations and zoning in the vicinity of the Project are shown in Figure 4.10-1 and Figure 4.10-2**,** respectively. The area north of the campus is zoned as low-medium density multi-family residential and single-family residential. The Los Angeles Valley College campus is immediately to the south and west of the Grant High School campus and is zoned Public Facilities. The area to the east is zoned as Open Space (including a greenbelt bordering the concrete lined Los Angeles River), and single-family and multi-family residential.

The proposed Project is located on an existing school campus within a consistent zoning designation, it would not conflict with any applicable land use plan, policy or regulation adopted for the purpose of avoiding or mitigating an environmental effect.

The proposed Project would include modernizing, constructing, and renovating buildings and infrastructure within the existing Grant High School campus. Proposed new and updated buildings would be compatible with the general character, massing, and color of existing buildings on campus and the surrounding neighborhoods in terms of architectural style, density, bulk and setback. Therefore, the proposed Project would be consistent with the surrounding community character.

Implementation of the proposed Project would fulfill the educational needs of local communities as described in the Program EIR, thereby reducing vehicle travel distances for students and promoting non-motorized vehicle travel. Therefore, the Project would be consistent with applicable goals of the SCAG 2012-2035 RTP/SCS.

The proposed Project would not conflict with applicable land use plans, policies, or regulations, and no impacts would occur. No mitigation measures or further evaluation are required.

[91] City of Los Angeles. 1998, Van Nuys–North Sherman Oaks Community Plan. https://planning.lacity.org/complan/pdf/vnycptxt.pdf. Adopted by the City Council on September 9, 1998.

Figure 4.10-1
GENERAL PLAN LAND USE MAP

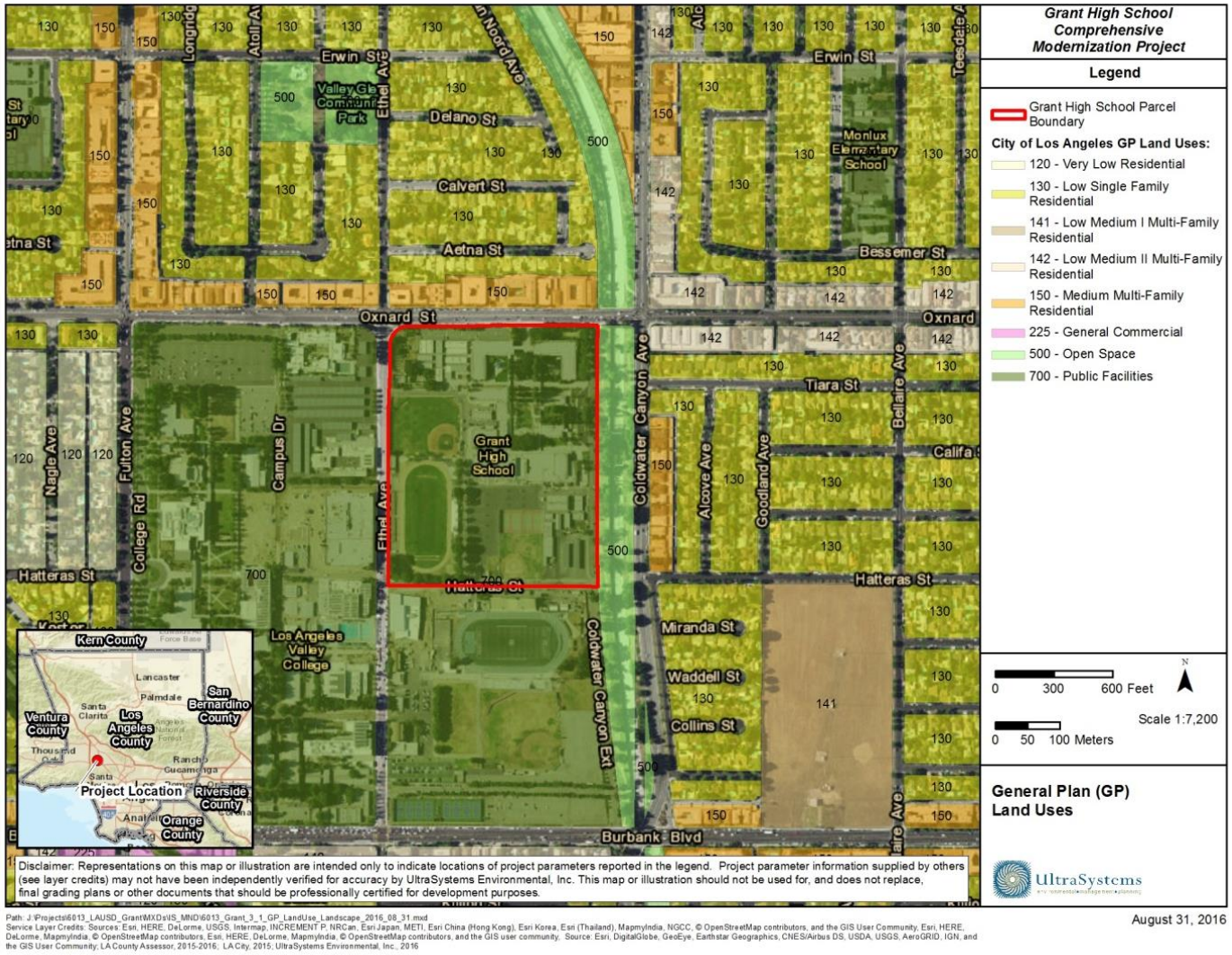
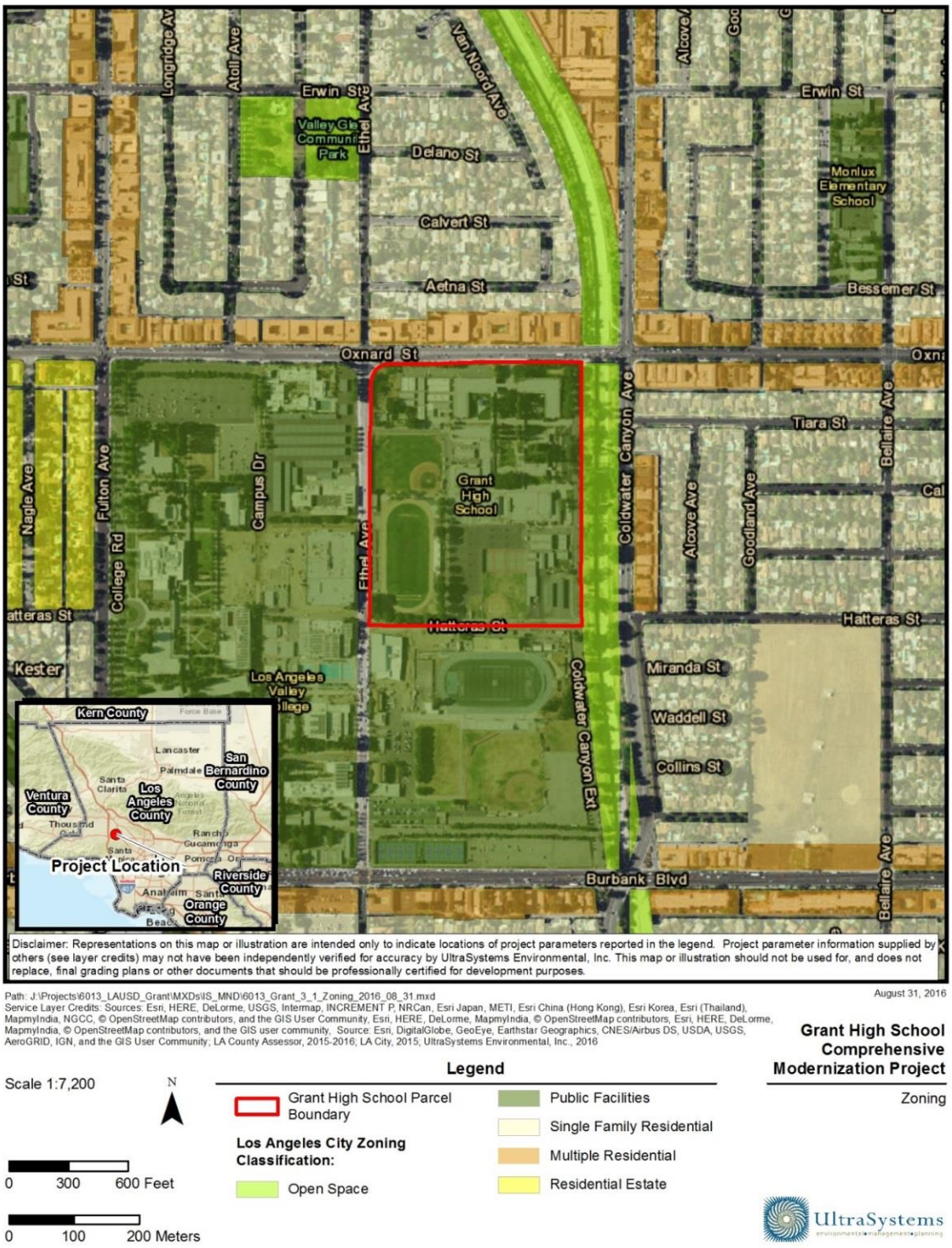


Figure 4.10-2
ZONING MAP



c) Would the project conflict with any applicable habitat conservation plan or natural community conservation plan?

No Impact. The proposed Project would be constructed entirely within the Grant High School campus. No habitat reserves established under a habitat conservation plan or natural community conservation plan are located within or near the school campus. Therefore, there would be no conflict with any habitat or natural community conservation plans, and no impact would occur as a result of Project implementation. No mitigation measures or further evaluation 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?	☐	☐	☐	☒

4.11.1 Summary of Impacts

The Program EIR evaluated the potential for implementation of SUP-related projects to impact mineral resources. The state geologist classified Mineral Resource Zone-2 (MRZ-2) sites are located in two regions within the LAUSD area: one in central Los Angeles, and the other in the east-central San Fernando Valley.[92] None of the designated mineral resource zones are located on or near an existing LAUSD school campus.

According to the Program EIR, projects implemented under the SUP are anticipated to have no impacts on mineral resources in the LAUSD region. Therefore, the Program EIR does not include SCs for minimizing impacts on mineral resources.

The Project-specific analysis provided in Section 4.11 concludes that implementation of the proposed Project would have no impacts on mineral resources in the project area.

[92] According to the Surface Mining and Reclamation Act (SMARA) of 1975, MRZ-1 are areas of no significant mineral resource deposits, MRZ-2 are areas that contain identified mineral resources, MRZ-3 are areas of undetermined mineral resource significance, and MRZ-4 are areas of unknown resource potential. http://www.consrv.ca.gov/smgb/Guidelines/Documents/ClassDesig.pdf. Accessed October 2016.

Figure 4.11-1
MINERAL RESOURCES

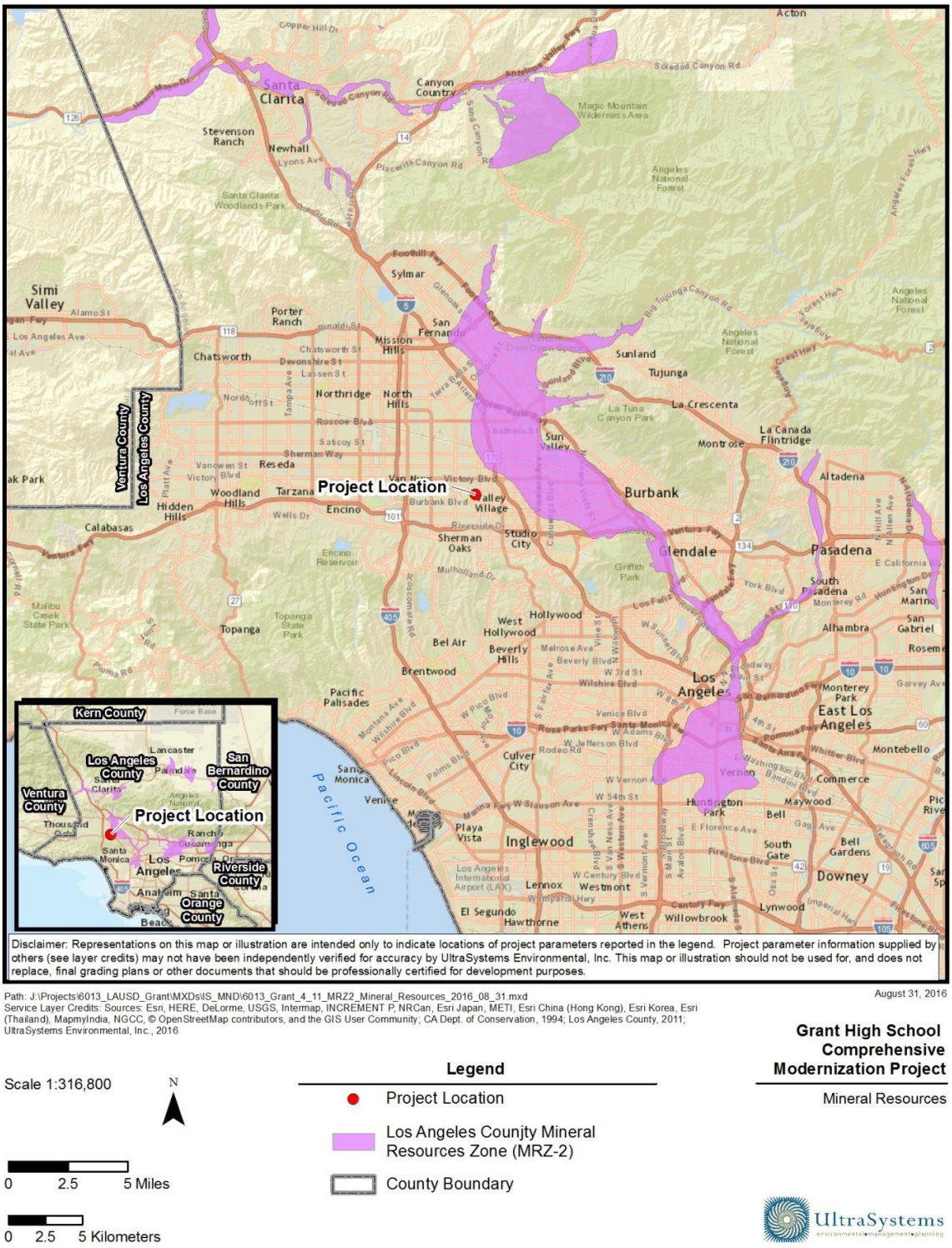
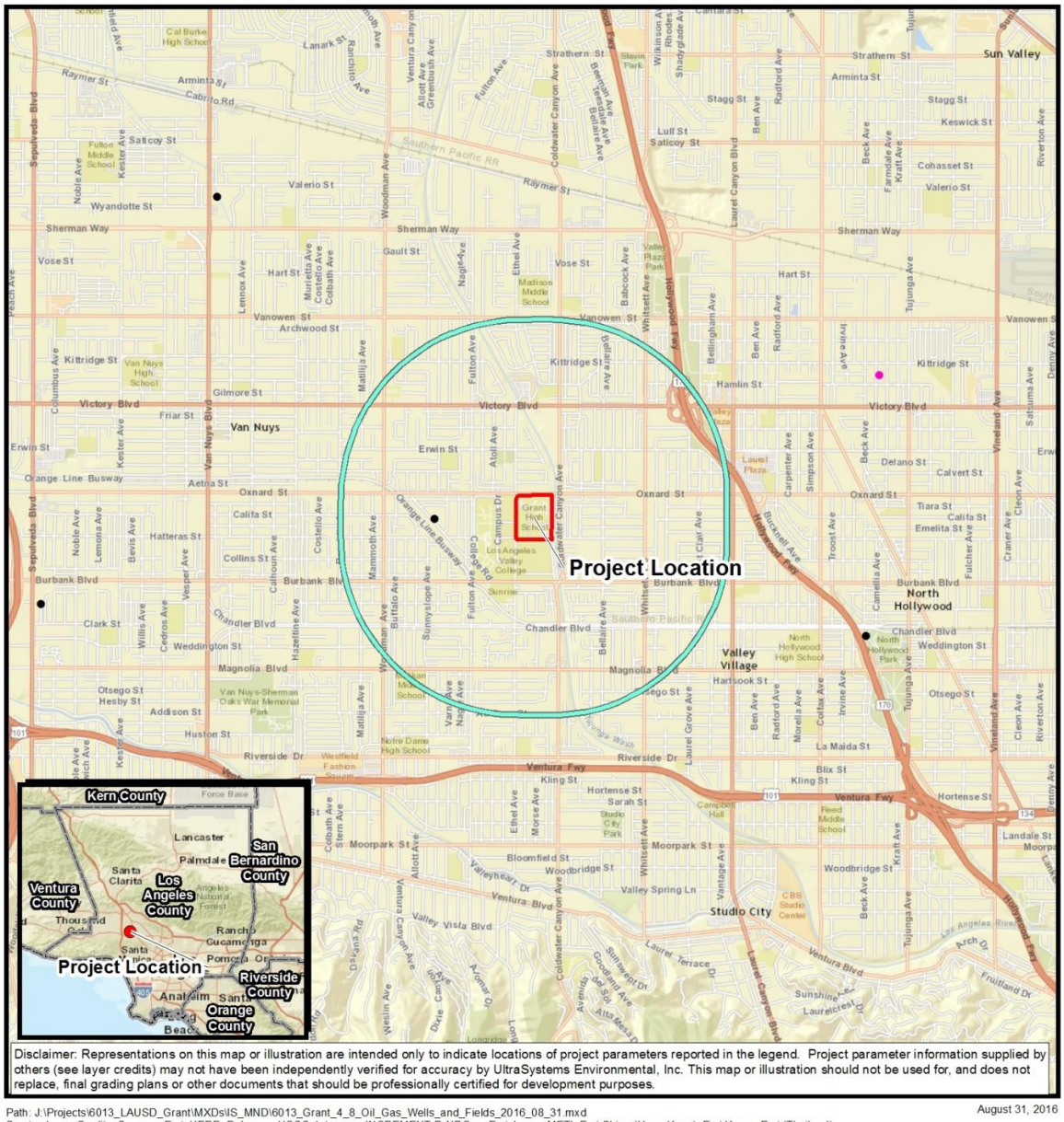


Figure 4.11-2
OIL AND GAS FIELDS



4.11.2 Impact Analysis

a) Would the project 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?

No Impact. This assessment of mineral resources is based on the State of California's Mineral Land Classification/Designation Program, established under the Surface Mining and Reclamation Act (SMARA) in 1975.[93, 94] The primary objectives of SMARA are the assurance of adequate supplies of mineral resources important to California's economy and the reclamation of mined lands. These objectives are implemented through land use planning and regulatory programs administered by local government with the assistance of the Department of Conservation, California Geological Survey (CGS). Information on the location of important mineral deposits is developed by the CGS through a land use planning process termed mineral land classification. According to the SMARA Generalized Mineral Land Classification Map for Los Angeles County, the Project site is not classified within any of four SMARA designated mineral resource zones,[95] as shown on Figure 4.11-1. Based on review of the Conservation Element of the City of Los Angeles General Plan and the Division of Oil, Gas and Thermal Resources mapping,[96] the Project site is not located within a known oil and gas field, or in the vicinity of oil and gas wells, as shown on Figure 4.11-2.

The Project site is located more than eight miles west of the nearest mineral resource zone and approximately 0.7 mile north of the nearest oil and gas field boundary. Furthermore, Project activities would be entirely on the grounds of the Grant High School campus, and there are no mining sites located on existing LAUSD campuses. Therefore, no impact on mineral resources would occur. No mitigation measures or further evaluation are required.

b) Would the project 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?

No Impact. As discussed above in the response to Checklist Question 4.11(a), Project activities would be entirely carried out on the Grant High School campus. No mineral resource recovery sites are located on the campus, nor do mineral extraction operations occur on the campus. Therefore, the Project would not result in the loss of availability of a known mineral resource or a mineral resource recovery site. No impact would occur. No mitigation measures or further evaluation are required.

93 California Department of Conservation. Mineral Land Classification. http://www.conservation.ca.gov/cgs/minerals/mlc. Accessed March 2017.

94 California Department of Conservation. SMARA Statutes and Associated Regulations. http://www.conservation.ca.gov/dmr/lawsandregulations. Accessed March 2017.

95 According to the Surface Mining and Reclamation Act (SMARA) of 1975, MRZ-1 are areas of no significant mineral resource deposits, MRZ-2 are areas that contain identified mineral resources, MRZ-3 are areas of undetermined mineral resource significance, and MRZ-4 are areas of unknown resource potential. http://www.consrv.ca.gov/smgb/Guidelines/Documents/ClassDesig.pdf. Accessed October 2016.

96 Division of Oil, Gas, and Geothermal Resources (DOGGR). 2001, April 16. District 1 Oil Fields. ftp://ftp.consrv.ca.gov/pub/oil/maps/dist1/Dist1_fields.pdf. Accessed October 2016.

4.12 Noise

This noise and vibration impact analysis is based upon the noise technical study prepared for the proposed Project (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?	☐	☐	☐	☒

4.12.1 Summary of Impacts

This noise and vibration impact analysis is based upon the noise technical study prepared for the proposed project (Appendix I). The Program EIR evaluated the potential for implementation of the SUP-related site-specific projects to result in adverse noise impacts to students and faculty at the upgraded school sites and to surrounding areas.

The Program EIR includes LAUSD SCs for minimizing impacts of noise in areas where future projects would be implemented under the SUP. Applicable SCs related to Project-specific noise impacts are provided in Table 4.12-1.

Table 4.12-1
NOISE AND VIBRATION STANDARD CONDITIONS OF APPROVAL

Applicable SCs	Description
SC-N-2	LAUSD shall analyze the acoustical environment of the site (such as traffic) and the characteristics of planned building components (such as heating, ventilation, and air conditioning [HVAC]), and design to achieve interior classroom noise levels of less than 55 dBA L_{10} or 45 dBA L_{eq} with maximum (unoccupied) reverberation times of 0.6 seconds. Noise reduction methods shall include, but are not limited to, sound walls, building and/or classroom insulation, HVAC modifications, double-paned windows, and other design features in order to achieve the noise standards. • The District should acknowledge the ANSI (American National Standards Institute) S12 standard as a District goal that may presently not be achievable in all cases.

Applicable SCs	Description
	• Where economically feasible, new school design should achieve classroom acoustical quality consistent with the ANSI standard and in no event exceed the current CHPS (California High Performance Schools) standard of 45 dBA. • Where economically feasible, new HVAC (Heating, Ventilating, and Air Conditioning) installations should be designed to achieve the lowest possible noise level consistent with the ANSI standard. In no event should these installations exceed the current CHPS standard of 45 dBA. • To promote the development of lower noise emitting HVAC units, the District's purchase of new units should give preference to manufacturers producing the lowest noise level at the lowest cost. Existing HVAC units operating in excess of 50 dBA should be modified.
SC-N-3	LAUSD shall require an acoustical analysis to identify feasible measures to reduce traffic noise increases to 3 dBA CNEL or less at the noise-sensitive land use. LAUSD shall implement recommended measures to reduce noise.
SC-N-4	LAUSD shall incorporate long-term permanent noise attenuation measures between playgrounds, stadiums, and other noise-generating facilities and noise-sensitive land uses, to reduce noise levels to meet jurisdictional standards or an increase of 3 dB or less over ambient. Operational noise attenuation measures include, but are not limited to: • buffer zones • berms • sound barriers: • buildings • masonry walls • enclosed bleacher foot wells • -other site-specific project design features.
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 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	The LAUSD shall require the construction contractor to minimize blasting for all construction and demolition activities, where feasible. If demolition is necessary adjacent to residential uses or fragile structures, the LAUSD shall require the construction contractor to avoid using impact tools. Alternatives that shall be considered include mechanical methods using hydraulic crushers or deconstruction techniques.
SC-N-7	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 below applicable noise ordinances. Exterior

Applicable SCs	Description
	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 have quality mufflers installed • Lubrication & Maintenance – well maintained equipment is quieter • Reduced Power Operation – use only necessary size and power • Limit Equipment On-Site – only have necessary equipment on-site • Noise Compliance Monitoring – technician on site to ensure compliance • Quieter Backup Alarms – manually-adjustable or ambient sensitive types • 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.
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.

The Project-specific analysis provided in Section 4.12 concludes that implementation of the Grant High School Project would have either no impacts or less than significant noise impacts on the surrounding community.

4.12.2 Impact Analysis

a) Would the project expose persons to or generate noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Less Than Significant. The predominant source of noise in the area of Grant High School is motor vehicle traffic. Oxnard Street, which forms the school's northern boundary, is classified as an "Avenue II,"[97] and has an average traffic of about 35,600 vehicles per day.[98] Coldwater Canyon Avenue, which forms the school's eastern boundary, is also an "Avenue II,"[99] with an average traffic of about 20,700 vehicles per day.[100] Results of ambient noise measurements in the Project area are presented in Table 4.12-4.

Grant High School is in the city of Los Angeles, as are the properties immediately surrounding the school. The Noise Element of the City of Los Angeles General Plan deems the following land uses "noise sensitive:[101]

- Single-family and multi-unit dwellings
- Long-term care facilities (including convalescent and retirement facilities)
- Dormitories, motels, hotels, transient lodgings and other residential uses
- Houses of worship
- Hospitals
- Libraries
- Schools
- Auditoriums; concert halls; outdoor theaters
- Nature and wildlife preserves
- Parks

The principal existing sensitive receivers nearest the Project site are residential neighborhoods immediately adjacent on the north and east sides of the school. Los Angeles Valley Community College is about 85 feet to the south-southwest. Table 4.12-2 shows the distances to the nearest land uses normally considered to be noise-sensitive. Sensitive receivers within 0.25 mile of Grant High School are shown in Figure 4.12-1.

Onsite sensitive receivers include classrooms and outdoor areas where students congregate. They would be near much of the construction activity. Impacts to on-campus land uses are discussed below.

97 Ulysses S. Grant Senior High School Modernization Traffic Memo. Traffic memorandum from Meghan Macias, Transpo Group to Linda Wilde, Los Angeles Unified School District and Betsy Lindsay, UltraSystems Environmental Inc. May 8, 2017, p. 7.
98 *Ibid*., p. 9.
99 *Ibid*., p. 7.
100 *Ibid*., p. 9.
101 Noise Element of the Los Angeles City General Plan. City of Los Angeles, Department of City Planning, Los Angeles, California. Adopted February 3, 1998. P.3-1. http://planning.lacity.org/cwd/gnlpln/noiseElt.pdf. Accessed December 16, 2016.

Table 4.12-2
NEAREST EXISTING SENSITIVE RECEIVERS

	Sensitive Receiver Name	Type	Location	Distance from Proposed Project[a] (Feet)
1	Apartment Building	Multi-Family Dwelling	13031 Oxnard Street Van Nuys, CA 91401 Latitude: 34.179581 Longitude: -118.417065	80
2	Los Angeles Valley Community College	School (Public College)	5792 Ethel Avenue Sherman Oaks, CA 91401 Latitude: 34.175398 Longitude: -118.418026	85
3	The Church of Jesus Christ Latter-Day Saints	House of Worship	13042 Burbank Blvd. Van Nuys, CA 91401 Latitude: 34.171921 Longitude: -118.417196	93
4	Private Residence	Single-Family Dwelling	5914 Coldwater Canyon Avenue Valley Village, CA 91607 Latitude: 34.177930 Longitude: -118.413567	271
5	Sunrise School	School (Developmental Disabilities School)	13130 Burbank Blvd. Sherman Oaks, CA 91401 Latitude: 34.171677 Longitude: -118.419267	375
6	Maggy Haves School	School (Private Preschool)	6100 Coldwater Canyon Avenue North Hollywood, CA 91606 Latitude: 34.181424 Longitude: -118.413353	767
7	Monlux Elementary School	School (Public Elementary School)	6051 Bellaire Avenue North Hollywood, CA 91606 Latitude: 34.181437 Longitude: -118.409848	1,318

Source: UltraSystems and Google Earth Pro. 2016.
[a]Distances from nearest edge of school site.

Figure 4.12-1
SENSITIVE RECEIVERS NEAR GRANT HIGH SCHOOL

On Thursday, October 20, 2016, UltraSystems conducted ambient noise sampling at ten locations on campus and in the general project area; the locations are shown in Figure 4.12-2. Table 4.12-3 lists the measurement points, sampling times, and why the sites were chosen.

The sampling locations were chosen to provide ambient noise data to compare with the results of construction noise estimates A Quest SoundPro Model DL-1-1/3 ANSI Type 1 sound level meter was used in the "slow" mode at each site to obtain a 15-minute average sound level (L_{eq}), as well as other metrics. The meter's microphone was maintained five feet above the ground. The samples were taken in the morning on a Wednesday. Noise meter output records and observations during sampling are in Attachment 1.

Table 4.12-3
CHARACTERISTICS OF AMBIENT NOISE MEASUREMENT LOCATIONS

Point	Sampling Location	Time Interval	Purpose of Selection
1	Near Classroom & Library (On Campus)	0903–0918	Additional building near to construction
2	Near Classroom & Arts Bldg. (On Campus)	0925–0940	Nearest building to future construction
3	Near Classrooms & Portables (On Campus)	0945–1000	Additional building near to construction
4	5914 Coldwater Canyon Ave. (Residential Area)	1036–1051	Nearest residential area east of the Project site
5	5800 Coldwater Canyon Ave. (Residential Area)	1056–1111	Nearest residential area southeast of the Project site
6	12860 Oxnard Street (Residential Area)	1117–1132	Nearest residential area northeast of the Project site
7	12959 Oxnard Street (Residential Area)	1137–1152	Nearest residential area north of the Project site
8	13059 Oxnard Street (Residential Area)	1157–1212	Nearest residential area northwest of the Project site
9	5712 Ethel Avenue (Residential Area)	1221–1236	Nearest area southwest of the Project site
10	Hatteras Street (LA Valley College Stadium)	1240–1255	Nearest area south of the Project site

Figure 4.12-2
AMBIENT NOISE MONITORING SITES FOR GRANT HIGH SCHOOL

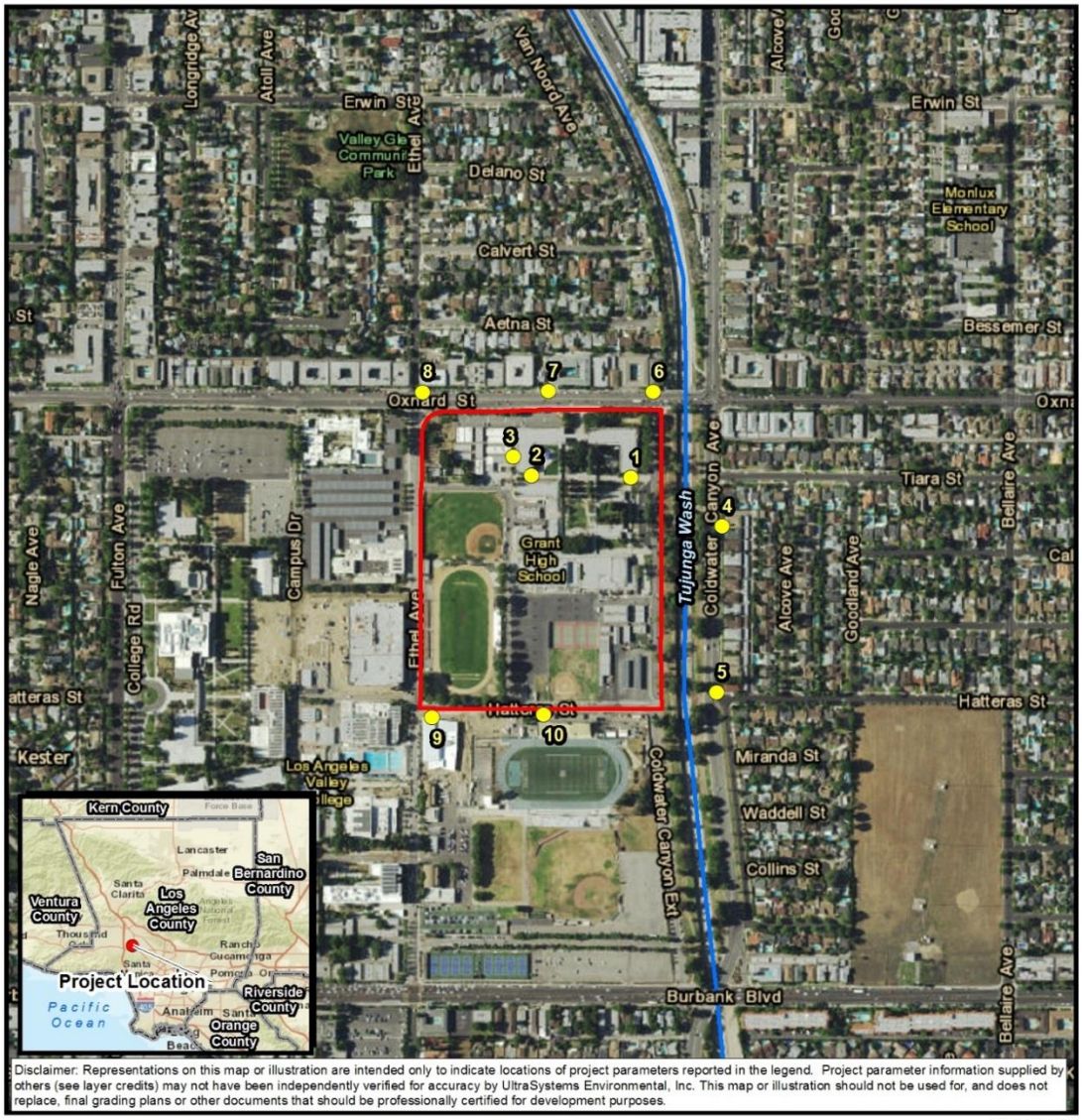


Table 4.12-4 shows the results of the ambient noise sampling. Ambient noise levels for the ten sampling points averaged (L_{eq}) 67.3 dBA (dBA = A-weighted decibels). L_{90} values averaged 55.2 dBA.

Table 4.12-4
MEASURED AMBIENT NOISE LEVELS

Point	Measurement Results (dBA)		
	15-Minute L_{eq}	L_{max}	L_{90}
1	56.8	71.1	51.5
2	58.6	74.0	51.8
3	60.8	68.6	51.2
4	65.2	76.6	50.9
5	68.4	85.8	51.3
6	71.4	88.3	61.3
7	69.0	80.5	54.5
8	72.4	84.3	59.2
9	59.1	74.4	50.4
10	62.3	77.8	48.6

Notes
dBA – A-weighted decibel
L_{eq} – average ambient noise level
L_{max} – maximum sound level
L_{90} – general background noise

Average ambient noise levels (L_{eq}) ranged from 56.8 to 72.4 dBA. The highest average noise levels were at measurement point 6 and 8, which is near the heavily traveled Oxnard Street. For most of the ambient monitoring locations, the difference between the L_{eq} and L_{90} values ranged from 5.3 to 17.1 dBA. Since the L_{90} is a measure of general "background" noise, it appears that Oxnard Street is an important noise contributor on the northern side of the Project area. Two of the three ambient monitoring locations on campus yielded the lowest difference between the L_{eq} and L_{90} values. This implies a lack of loud sustained noise sources on the campus.

Project-Specific Regulations

Section 5.12 of the Program EIR describes in considerable detail the laws, regulations and policies of the federal government, the State of California, and the City of Los Angeles[102] that are intended to reduce people's exposure to noise. The reader is referred to that discussion. For convenience in interpreting the findings of this technical study, we repeat those regulations that are directly relevant to the proposed Project.

Federal

Because Grant High School is bordered on two sides by residences that could be affected by construction noise from the Project, the U.S. Department of Housing and Urban Development's goal of 45 dBA day-night average

[102] Because Grant High School and the immediately surrounding area are within the City of Los Angeles, the City's regulations take precedence over those of the County of Los Angeles, which apply to unincorporated areas.

noise (L_{dn}) as a desirable maximum interior standard for residential units developed under HUD funding[103] is pertinent. While HUD does not specify acceptable exterior noise levels, standard construction of residential dwellings constructed under Title 24 of the CCR typically provides 20 dBA of acoustical attenuation with the windows closed and 10 dBA with the windows open. Based on this assumption, neither the exterior L_{dn} or the Community Noise Equivalent level (CNEL) should exceed 65 dBA under normal conditions.

State of California

The most current guidelines prepared by the state noise officer are contained in the "General Plan Guidelines" issued by the Governor's Office of Planning and Research in 2003.[104] [105] These guidelines establish four categories for judging the severity of noise intrusion on specified land uses:

- **Normally Acceptable**: Is generally acceptable, with no mitigation necessary.
- **Conditionally Acceptable**: May require some mitigation, as established through a noise study.
- **Normally Unacceptable**: Requires substantial mitigation.
- **Clearly unacceptable**: Probably cannot be mitigated to a less-than-significant level.

The types of land uses addressed by the state standards, and the acceptable noise categories for each are presented in Table 4.12-5, Land Use Compatibility for Community Noise Sources. There is some overlap between categories, which indicates that some judgment is required in determining the applicability of the numbers in every situation.

City of Los Angeles

The City of Los Angeles has established noise standards and guidelines that are consistent with the federal and state noise standards. The Noise Element of the City of Los Angeles' General Plan uses a scheme similar to that of Table 4.12-5 to classify the acceptability of different long-term noise levels for sensitive land uses.[106] For the single-family houses immediately bordering Grant High School, 24-hour averages below 55 dBA CNEL are normally acceptable, and levels between 55 and 70 dBA CNEL are conditionally acceptable. For multifamily housing, 24-hour averages below 60 dBA CNEL are normally acceptable, and levels between 60 and 70 dBA CNEL are conditionally acceptable.

As described in the Program EIR, the City of Los Angeles Municipal Code has short-term noise exposure standards for various types of sources, but none appears to be relevant to this analysis. Section 41.40(a) of the Municipal Code restricts construction operations to 7:00 a.m. to 9:00 p.m., Monday through Friday, 8:00 a.m. to 6 p.m. on Saturdays and national holidays. Construction is prohibited on Sundays. Variances for construction during normally prohibited hours may be obtained from the Executive Officer of the Los Angeles Board of Police Commissioners.[107]

Section 112.05(a) of the City of Los Angeles Municipal Code limits noise exposures from construction equipment to 75 dBA at a distance of 50 feet. Almost all common types of construction equipment exceed that

[103] The Noise Guidebook: a Reference Document for Implementing the Department of Housing and Urban Development's Noise Policy. U.S. Department of Housing and Urban Development. March 1985.
[104] General Plan Guidelines: State of California, Governor's Office of Planning and Research, Sacramento, California. 2003.
[105] Prior to this, the California Department of Health Services (DHS) Office of Noise Control studied the correlation of noise levels with effects on various land uses. However, the Office of Noise Control no longer exists.
[106] City of Los Angeles. Noise Element of the Los Angeles City General Plan. Exhibit I: Guidelines for Noise Compatible Land Use. Department of City Planning, Los Angeles, California. Adopted February 3, 1999. Internet URL: http://planning.lacity.org/cwd/gnlpln/noiseElt.pdf.
[107] City of Los Angeles Municipal Code. § 41.40(b).

limit. The Municipal Code allows exceedance of the limit upon demonstration that compliance is technically infeasible.

Thresholds of Significance for this Analysis

Two criteria were used for judging noise impacts from the proposed Project. First, noise levels generated by the proposed Project must comply with all relevant federal, state, and local standards and regulations. Noise impacts on the surrounding community are limited by local noise ordinances, which are implemented through investigations in response to nuisance complaints. It is assumed that all existing regulations for construction and operation of the proposed Project will be enforced. In addition, the proposed Project should not produce noise levels that are incompatible with adjacent noise sensitive land uses.

The second measure of impact used in this analysis is a significant increase in noise levels above existing ambient noise levels as a result of the introduction of a new noise source. An increase in noise level due to a new noise source has a potential to adversely impact people. According to LAUSD guidelines,[108] the proposed Project would have a significant noise impact if it would do any of the following:

- Create a maximum exterior noise level exceeding 70 dBA L_{10} or 67 dBA L_{eq}.
- Result in a maximum interior classroom noise level exceeding 55 dBA L_{10} or 45 dBA L_{eq}.
- Result in a permanent increase in noise levels at nearby sensitive land uses exceeding 3 dBA CNEL.

The following additional criteria are from the City of Los Angeles. The proposed Project would have a significant noise impact if it would do any of the following:

- Generate operational noise from traffic and onsite sources that would cause the ambient noise levels at the property line of affected uses to increase by 3 dBA CNEL and noise levels reach or are within the "normally unacceptable" or "clearly unacceptable" category or increase by 5 dBA CNEL or greater.
- Generate noise from operational stationary sources that causes ambient levels to increase by more than 5 dB.
- For construction activities lasting more than one day, exceed existing exterior ambient levels by 10 dBA or more at a noise sensitive use.
- For construction activities lasting more than ten days in a three-month period, exceed existing exterior ambient levels by 5 dBA or more at a noise sensitive use.
- For construction activities between 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, exceed the ambient level by 5 dBA at a sensitive receiver.

[108] LAUSD OEHS, "School Upgrade Program Final Environmental Impact Report," *http://achieve.lausd.net/ceqa*, Adopted by the Board of Education on November 10, 2015., p. 5.12-25.

Table 4.12-5
LAND USE COMPATIBILITY FOR COMMUNITY NOISE SOURCES

Land Use Category	Noise Exposure (dBA, CNEL)						
	55	60	65	70	75	80	
Residential – Low-Density Single-Family, Duplex, Mobile Homes							
Residential – Multiple Family							
Transient Lodging – Motel, Hotels							
Schools, Libraries, Churches, Hospitals, Nursing Homes							
Auditoriums, Concert Halls, Amphitheaters							
Sports Arena, Outdoor Spectator Sports							
Playgrounds, Neighborhood Parks							
Golf Courses, Riding Stables, Water Recreation, Cemeteries							
Office Buildings, Business Commercial and Professional							
Industrial, Manufacturing, Utilities, Agriculture							

	Normally Acceptable: Specified land use is satisfactory, based upon 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 system or air conditioning will normally suffice.
	Normally Unacceptable: New construction or development should generally be discouraged. If new construction or development does proceed, a detailed analysis of the noise reduction requirements must be made and needed noise insulation features included in the design.
	Clearly Unacceptable: New construction or development should generally not be undertaken.

Source: State of California, 2003.

The proposed Project will replace or upgrade facilities on the campus of Grant High School, but it will not increase the number of students or faculty at the school, and will not introduce major new on-site noise sources or bring existing noise sources closer to sensitive receivers. Therefore, there will be no change in exposure to the community and the impact will be less than significant. No mitigation measures or further evaluation are required.

b) Would the project expose persons to or generate excessive ground-borne vibration or ground-borne noise levels?

Less Than Significant Impact. As stated in the Program EIR, school operations do not involve sources that cause substantial ground-borne vibration. Therefore, the proposed Project would not result in long-term significant impacts due to ground-borne vibration or noise levels.

Certain types of construction activity, such as pile driving and use of explosives for rock blasting can be annoying and can damage fragile structures. Use of explosives for rock blasting would not be necessary under this Project. It is not anticipated that pile driving will be required, however if rammed aggregate or sonic pile driving is an option considered during the design stage, then implementing SC-N-7 and SC-N-9 will ensure that not only damage to fragile structures but also noise exposure from pile driving would either be precluded or be reduced to a less than significant level. No mitigation measures or further evaluation are required.

c) Would the project cause a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?

Less Than Significant Impact. The Project would replace or upgrade facilities on the campus of Grant High School, but it would not increase the number of students or faculty at Grant High School, and would not introduce major new onsite noise sources or bring existing noise sources closer to sensitive receivers. Therefore, there would be no change in exposure to the community and the impact would be less than significant. No mitigation measures or further evaluation are required.

For offsite, on road noise impacts to be significant, it is generally necessary for traffic to double.[109] The proposed Project would not increase the existing number of students, nor would it add additional uses, and therefore would not generate new (permanent) traffic to the study area.[110] Therefore, impacts would be less than significant. No mitigation measures or further evaluation are required.

d) Would the project cause a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?

Less Than Significant Impact. Noise impacts from construction activities are a function of the noise generated by the operation of construction equipment and on-road delivery and worker commuter vehicles, the location of equipment, and the timing and duration of the noise-generating activities. For the purpose of this analysis, it was estimated that construction of the proposed Project would begin in mid-January 2019 and finish mid-January 2022. The Project would be divided into two approximately 18-month, non-overlapping phases.

109 *Technical Noise Supplement.* Prepared by ICF Jones & Stokes, Sacramento, California for California Department of Transportation (Caltrans), Sacramento, California (November 2009), p. 2-12.

110 Ulysses S. Grant Senior High School Modernization Traffic Memo. Traffic memorandum from Meghan Macias, Transpo Group to Linda Wilde, Los Angeles Unified School District and Betsy Lindsay, UltraSystems Environmental Inc. May 8, 2017, p. 1.

The air pollutant emissions estimation model CalEEMod[111] was used with the preliminary design and scheduling information from LAUSD[112] to estimate the number of days to execute the following construction phases:

- Demolition/interior remodeling.
- Site preparation.
- Building construction.
- Architectural coating.
- Onsite paving and offsite street work.
- Offsite (local street) paving.

Table 4.12-6 lists the equipment expected to be used. For each equipment type, the table shows an average noise emission level (in dB at 50 feet, unless otherwise specified) and a "usage factor," which is an estimated percentage of operating time that the equipment would be producing noise at the stated level.[113] Equipment use was matched to phases of the construction schedule.

Table 4.12-6
CONSTRUCTION EQUIPMENT NOISE CHARACTERISTICS

Equipment Type	Horsepower	Usage Factor	Maximum Sound Level (dBA @ 50 feet)
Air Compressor (portable)	78	0.4	81
Bore/Drill Rig	221	0.5	84
Crane	231	0.2	83
Crushing/Process Equipment	85	0.8	96
Excavator	158	0.4	80
Forklift	89	0.2	67
Paver	130	0.5	77
Plate Compactor	8	0.2	83
Pump	84	0.5	81
Roller	80	0.2	80
Rubber Tired Loader	203	0.4	79
Skid Steer Loader	65	0.4	79
Tractor/Loader/Backhoe	97	0.4	85
Trencher	78	0.5	83
Water Trucks	402	0.4	79

Construction noise from onsite activities was analyzed for each of the six subphases within each of the two 18-month main phases. These are shown in the first column of Table 4.12-7. The impact analysis focused on three sensitive receivers described in Table 4.12-3 and shown in Figure 4.12-2: an apartment building on Oxnard Street (No. 1), a single-family residence on Coldwater Canyon Avenue (No. 4) and Los Angeles Valley Community College (No. 3). These residences correspond approximately to ambient noise sampling points 8,

111 BREEZE Software, California Emissions Estimator Model. User's Guide, Version 2016.3.1, September 2016.
112 Email from Linda Wilde, Los Angeles Unified School District, Los Angeles, CA to Betsy Lindsay, UltraSystems Environmental, Inc., Irvine, CA. April 18, 2017.
113 Equipment noise emissions and usage factors are from Knauer, H. et al., 2006. FHWA Highway Construction Noise *Handbook*. U.S. Department of Transportation, Research and Innovative Technology, Administration, Cambridge, Massachusetts, FHWA-HEP-06-015 (August 2006), except where otherwise noted.

4, and 9, respectively. Distances between each construction activity and each sensitive receiver were determined by Geographic Information System (GIS) analysis.

Table 4.12-7 shows the calculated one-hour average noise exposure (L_{eq}) at each receiver during each of the 12 construction phase combinations. The highest exposure (about 81 dBA L_{eq}) would occur during onsite parking lot paving across the street from the Oxnard Street apartments. The next highest exposures would be 77.6 dBA L_{eq} at the Coldwater Canyon Avenue residence and 76.6 dBA L_{eq} at the Oxnard Street residence during demolition.

Table 4.12-7
CONSTRUCTION NOISE EXPOSURES AT THREE SENSITIVE RECEIVERS

Construction Phase Combination	Hourly Exposure (dBA L_{eq})		
	Oxnard Apartments	Coldwater Cyn. House	Los Angeles Valley CC
Phase I			
Demolition	76.6	72.5	**71.8**
Site Preparation	67.0	63.0	62.2
Building Construction	68.1	64.1	63.3
Architectural Coating	63.3	59.0	55.0
Onsite Paving	**81.2**	61.7	65.9
Offsite Street Paving	67.0	68.1	64.1
Phase II			
Demolition	73.6	**77.6**	69.7
Site Preparation	64.0	68.1	60.1
Building Construction	65.1	69.2	61.2
Architectural Coating	53.4	57.9	52.0
Onsite Paving	62.9	61.2	62.6
Offsite Street Paving	66.9	70.6	58.5

As seen in Table 4.12-8, for the Oxnard apartments, the Coldwater Canyon house, and the community college, the increase over the measured ambient levels would be 9.3, 12.6 and 12.9 dBA L_{eq}, respectively.

Table 4.12-8
ESTIMATED UNMITIGATED CONSTRUCTION NOISE EXPOSURES AT NEAREST SENSITIVE RECEIVERS

Site	Sensitive Receiver	1-Hour L_{eq} (dBA)		
		Existing	Projected[a]	Change
1	13031 Oxnard Street Van Nuys, CA 91401	72.4	81.7	+9.3
4	5914 Coldwater Canyon Avenue Valley Village, CA 91607	65.2	77.8	+12.6
3	Los Angeles Valley Community College 5792 Ethel Avenue Sherman Oaks, CA 91401	59.1	72.0	+12.9

[a]Existing ambient plus contribution of construction equipment during the loudest construction phase combination.

These increases in unmitigated noise exposure would normally be considered significant. However, the analysis did not take into account shielding by existing and future structures. Furthermore, the construction noise measures enumerated in SC-N-9 will reduce exposures to a less than significant level. These measures will be incorporated in the design build contract for the proposed Project. Those SCs having particular utility for the exposures near the campus include:

- Limit construction activity to 7:00 a.m. to 7:00 p.m.
- Wherever practical, use electric-powered instead of diesel construction equipment.
- Ensure that engines have quality mufflers installed and in proper condition.
- Minimize the number of pieces of construction equipment operating simultaneously.
- Have a technician onsite to ensure compliance.

- Erect temporary, portable wooden or concrete barriers between noise sources and receivers.
- Deliver advance notice of construction to potentially affected sensitive receivers and provide a means for filing complaints to the contractor and the District.

Therefore, impacts would be less than significant. No mitigation measures or further evaluation are required.

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

No Impact. The Burbank (Bob Hope) Airport is located approximately 3.5 miles northeast of Grant High School, Van Nuys Airport is located approximately 4.5 miles northwest of the campus, and Whiteman Airport is located approximately 5.5 miles north of the campus. The flight patterns for landings and take-offs from the three airports are not in the general vicinity of Grant High School, and do not cross over the campus (Figure 4.8-1). The Project site is not located in the airport influence areas for these three airports.[114] Therefore, no impacts would occur. No mitigation measures or further evaluation are required.

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?

No Impact. The Project site is not located within the vicinity of a private airstrip, or heliport or helistop. Grant High School is an existing campus; therefore, the proposed Project would not create any new safety hazards associated with a private airstrip, or heliport/helistop operations, and no impacts would occur in this regard. No mitigation measures or further evaluation are required.

[114] Airport Land Use Commission (ALUC), Los Angeles County. Van Nuys Airport and Bob Hope Airport Influence Areas. May 13, 2003.

4.13 Pedestrian Safety

The following analysis is based on the findings of the Traffic Study Technical memorandum which includes a pedestrian access analysis[115] (see Appendix G).

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?	☐	☐	☐	☒

4.13.1 Summary of Impacts

The Program EIR evaluated the potential for SUP-related projects to impact pedestrian safety. Most of LAUSD's campuses, and Grant High School specifically, are located in urban areas with established street systems that provide access to the various school sites.

The Program EIR includes SCs for minimizing impacts on pedestrian safety in areas where future projects would be implemented under the SUP. Applicable SCs for the Project related to pedestrian safety are provided in Table 4.13-1.

Table 4.13-1
PEDESTRIAN SAFETY STANDARD CONDITIONS OF APPROVAL

Applicable SCs	Description
SC-PED-5	**School Design Guide**. The Guide states that student drop-off and pick-up areas, bus loading areas, and parking areas shall be separated to allow students to enter and exit the school grounds safely.
SC-T-3	**Coordinate with the local City or County jurisdiction and agree on the following:** • Compliance with the jurisdiction's design guidelines for access, parking, and circulation in the vicinity of the project. • Scope of analysis and methodology for the traffic and pedestrian study, including trip generation rates, trip distribution, number and location of intersections to be studied, and traffic impact thresholds. • Implementation of SRTS, traffic control and pedestrian safety devices. • Fair share contribution and/or other mitigation measures for potential traffic impacts. • Traffic and pedestrian safety impact studies shall address local traffic and congestion during morning arrival times, and before and after evening stadium events. • Traffic study will use the latest version of Institute Transportation Engineer's (ITE) Trip generation manual to determine trip generation rates (parent vehicles, school buses, staff/faculty vehicles, and delivery vehicles) based on the size of the school facility and the specific school type (e.g. Magnet, Charter, etc.), unless otherwise required by local jurisdiction.

[115] Traffic Study Grant High School Modernization, Transpo Group April 2017.

Applicable SCs	Description
	Loading zones will be analyzed to determine the adequacy as pick-up and drop-off points. Recommendations will be developed in consultation with the local jurisdiction for curb loading bays or curb parking restrictions to accommodate loading needs and will control double parking and across-the-street loading.
SC-T-4	**Construction Traffic.** 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

The Project-specific analysis provided in Section 4.13 concludes that implementation of the proposed Project would have less than significant impacts on pedestrian safety.

4.13.2 Impact Analysis

a) Would the project substantially increase vehicular and/or pedestrian safety hazards due to a design feature or incompatible uses?

Less than Significant Impact. The proposed Project is located on the Grant High School Campus, within the community of Valley Glen, a densely-developed urban area in the southeast San Fernando Valley. The campus is served by public transit (buses) with established routes, and the Metro Orange Line (a dedicated bus line) that includes stops near the intersection of Oxnard Street and Woodman Avenue, and near the intersection of Burbank Boulevard and Fulton Street. Both stops are approximately 0.5 mile from the Grant High School Campus. The area north of the campus is zoned low-medium density multi-family residential and single-family residential. The area immediately to the south and west is zoned public facility (i.e., Los Angeles Valley College). The majority of the surrounding areas near the campus are designated as single-family residential, with small areas to the southwest of the campus designated for commercial land use.

The Project will result in reconfiguration of some ingress and egress routes on the campus. Currently, Lancer Lane provides two-way traffic circulation with limited access from Oxnard Street. Access is restricted to inbound and outbound right turns. However, some existing traffic currently makes illegal inbound and outbound left turns, which presents a safety hazard due to the proximity of the intersection to Coldwater Canyon Boulevard. Lancer Lane will be reconfigured for northbound traffic only, with outbound right-turns permitted from Lancer Lane onto Oxnard Street. In addition, an internal vehicular right-of-way would be provided through the center of the campus, in a counter-clockwise direction to allow for emergency vehicle access. All other existing driveways and parking lots would remain the same. Therefore, general traffic flow to the campus would remain similar to the existing condition and the improvements will alleviate some congestion and reduce the safety hazard near the Lancer Lane and Oxnard Street intersection by limiting ingress.

Vehicular access and parking will be designed to comply with Section 2.3, Vehicular Access and Parking of the School Design Guide, January 2014. The School Design Guide contains general parking guidelines as well as guidelines related to vehicular and pedestrian safety, and security. Off-site improvements would include construction activities on the sidewalks and driveways located immediately adjacent to the campus for repair, creation, extension, or modification. .

Implementation of SC-PED-5, SC-T-3, and other LAUSD requirements would ensure that Project impacts related to pedestrian safety would be less than significant. The Project as designed would enhance pedestrian

safety. As discussed in Section 4.13, impacts with respect to pedestrian safety hazards would be less than significant.

The proposed Project would not increase the capacity of Grant High School, nor would it result in increased enrollment at the school. Design of the Project would include the use of 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.[116] Implementation of LAUSD OEHS CEQA Specification Manual, Appendix C, Traffic and Pedestrian Safety Requirements for New Schools and the School Design Guide, requires that bus loading areas would not overlap with car loading areas, thereby reducing the potential for conflicts between cars and buses arriving and departing, especially during pick-up and drop-off times. LAUSD requires implementation of SC-PED-5, which reiterates the School Design Guide by stating that 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.[117] In addition, projects are required to provide emergency vehicle access, as required by the City of Los Angeles Fire Department (LAFD), and conformance to local ordinances to ensure adequate access would be maintained. [118]

The main entrances for the school are Lancer Lane and Oxnard Street, with additional access from Ethel Avenue and Hatteras Street. Designated student pick-up and drop-off areas are along the sidewalks that are designated and marked as "Passenger Loading Only," with signage prohibiting parking during specified student pick-up and drop-off hours. Smaller buses for special needs students currently enter through the access driveway.

To further ensure pedestrian safety in the vicinity of the school during peak traffic hours, SC-T-4 would be implemented to limit haul trucks from accessing the site during specified student pick-up and drop-off times while project construction is ongoing.

Compliance with SC-PED-5 and SC-T-4, the LAUSD OEHS CEQA Specification Manual, and LAFD requirements would ensure that Project impacts related to pedestrian safety would be reduced to less than significant. The Project as designed would enhance pedestrian safety. Impacts with respect to vehicular and pedestrian safety hazards would be less than significant. No mitigation measures or further evaluation are required.

b) Would the project create unsafe routes to schools for students walking from local neighborhoods?

No Impact. The proposed Project would occur on an existing school campus and would be implemented in accordance with LAUSD SCs, as described in Response to Checklist Question 5.13.a. The Project would not change the existing pedestrian access routes and Project operation would not generate additional trips. During construction, if pedestrian access is temporarily changed, the LAUSD contractor will be required to comply with SC-T-4 for large construction equipment utilizing public roadways and access to LAUSD campuses. LAUSD will require contractors to submit a construction worksite traffic control plan prior to construction

116 LAUSD OEHS, "School Upgrade Program Final Environmental Impact Report," *http://achieve.lausd.net/ceqa*. Adopted by the Board of Education on November 10, 2015., page 5.13-10
117 *Ibid*, page 5.13-6.
118 *Ibid*, page 5.13-11.

start. Therefore, 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) Would the project be located on a site that is adjacent to or near a major arterial roadway or freeway that may pose a safety hazard?

No Impact. The proposed Project would occur on an existing school campus and would be implemented in accordance with LAUSD SCs. As described in response to pedestrian safety Checklist Questions a) and b), the Project would not change the existing pedestrian access routes or alter the campus in a manner that would create a safety hazard. Thus, implementation of the proposed Project would not pose a new safety hazard, as compared to current conditions. No impact would occur. No mitigation measures or further evaluation are required.

4.14 Population and 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?	☐	☐	☐	☒

4.14.1 Summary of Impacts

The Program EIR evaluated the potential for implementation of SUP-related projects to impact population growth in the LAUSD area and cause displacement of housing and people.

The Program EIR includes one SC for minimizing impacts associated with commercial or residential property acquisition and property displacement in areas where future projects would be implemented under the SUP. The proposed Project includes renovation and modernization of an existing school campus, located entirely within the boundary of the existing Grant High School campus, no property acquisition would be required. Therefore, the SC related to displacement of properties is not applicable to the proposed Project.

The Project-specific analysis provided in Section 4.14 concludes that implementation of the proposed Project would also have less than significant impacts related to indirect population growth, and no impacts related to displacement of housing and people in the project area.

4.14.2 Impact Analysis

a) Would the project induce substantial growth in an area either directly (for example, by proposing new homes and business) or indirectly (for example, through extension of roads or other infrastructure)?

Less Than Significant Impact. The 2010 population within the LAUSD boundaries was 4,579,411, slightly less than half the 9,818,605 population of Los Angeles County.[119] Grant High School is located within the Van Nuys -North Sherman Oaks Community in the east-central part of San Fernando Valley. The 2010 estimated population within the community of Van Nuys-North Sherman Oaks was 165,973, approximately 3.6% of the total population in the LAUSD area. The 2010 total number of households in Van Nuys-North Sherman Oaks area was 63,995, approximately four percent of the 1,645,648 households in the LAUSD area.[120, 121] Between

[119] LAUSD OEHS. "School Upgrade Program Final Environmental Impact Report." http://achieve.lausd.net/ceqa. Adopted by the Board of Education on November 10, 2015.
[120] City of Los Angeles, Van Nuys-North Sherman Oaks Community Plan. http://planning.lacity.org/complan/pdf/vnycptxt.pdf. Accessed October 2016.
[121] LAUSD OEHS. "School Upgrade Program Final Environmental Impact Report." http://achieve.lausd.net/ceqa. Adopted by the Board of Education on November 10, 2015.

2010 and 2035, population in the LAUSD area is estimated to increase by 13.7 percent and households are estimated to increase by 22.2 percent. Between the years 2013/2014 and 2023/2024, student populations in LAUSD for grades 9, 10, 11 and 12 are estimated to decline by 11.7, 8.1, 3.2, and 2 percent respectively.[122]

The proposed Project would include modernizing, constructing and renovating buildings and infrastructure within the Grant High School campus. The Project would not increase student capacity and the reconstructed/renovated facilities would serve students currently attending the school. The District will provide temporary portable buildings for classroom, office, and storage space onsite that would be removed and replaced as a part of the Project. These temporary facilities would be removed in phases as the Project is complete and permanent spaces become available for use.

The proposed Project would generate short-term construction employment. To the extent possible, the regional/local labor force would be utilized. However, there would be no increase in jobs or employment during Project operation. The Project does not include the extension of roads or increase in capacity of any existing offsite infrastructure. Therefore, the Project is not anticipated to induce substantial population growth in the area, either directly or indirectly. Less than significant impacts are anticipated. No mitigation measures or further evaluation are required.

b) Would the project displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?

No Impact. The proposed Project includes modernizing, constructing and renovating buildings and infrastructure within the existing Grant High School campus. The Project does not include expansion of the existing school campus and no property acquisition would be required. As previously noted, the District will provide onsite classroom and office/storage space in temporary portable buildings for students/staff that are displaced during construction. However, no existing housing would be displaced due to project construction or operation. Therefore, no impact would occur. No mitigation measures or further evaluation are required.

c) Would the project displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?

No Impact. The Project would be implemented within an existing school campus, and there are no people that could be displaced due to Project construction or operation. As previously noted, the District will provide temporary portable buildings for displaced students and staff on the campus that would be removed once the new facilities are complete. Therefore, no impact would occur. No mitigation measures or further evaluation are required.

122 *Ibid.*

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?	☐	☐	☐	☒

4.15.1 Summary of Impacts

The Program EIR evaluated the potential for implementation of SUP-related projects to impact public services in the LAUSD region.

The Program EIR includes SCs for minimizing impacts on fire protection, emergency services, and police protection services in areas where future projects would be implemented under the SUP. Applicable SCs related to public services for the proposed project are provided in Table 4.15-1.

Table 4.15-1
PUBLIC SERVICES STANDARD CONDITIONS OF APPROVAL

Applicable SCs	Description
SC-PS-1	LAUSD shall: 1) have local fire and police jurisdictions review all construction and site plans prior to the State Fire Marshall's final approval; and 2) provide a full site plan for the local review, including all buildings, both existing and proposed, fences, drive gates, retaining walls, and other construction affecting emergency vehicle access, with unobstructed fire lanes for access indicated.
SC-PS-2	LAUSD shall implement emergency preparedness and response procedures in all schools as required in LAUSD References, Bulletins, Safety Notes, and Emergency Preparedness Plans.

The Project-specific analysis provided in Section 4.15 concludes that implementation of the proposed Project would have less than significant impacts on fire protection, emergency, and police protection services; and parks; and no impacts on existing public facilities, such as schools and libraries in the Project area.

4.15.2 Impact Analysis

a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, construction of which could cause

significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:

i) Fire protection?

Less than Significant Impact. The LAFD provides fire protection and emergency medical services in the City of Los Angeles. The closest LAFD fire station to the Project site is Fire Station 102, located at 13200 Burbank Boulevard, approximately one mile south of the Project site. Fire Station 39, located at 14415 Sylvan Street, is approximately two miles northwest of the Project site. The LAFD's Schools, Churches and Institutions Units are responsible for the inspection of public, private and charter schools in the City of Los Angeles, including LAUSD schools, and for enforcing the California Public Safety Code, the California Health and Safety Code, the California Building Code and the California Fire Code.[123]

Construction of the Project may result in a temporary increase in demand for fire protection and emergency medical services. However, the Project would not result in an increase in enrollment within LAUSD or at Grant High School. Furthermore, overall LAUSD enrollment is forecast to decrease by 2.2% over the next ten years.[124] Therefore, implementation of the proposed Project would not generate increased demands for fire protection and emergency services due to a significant increase in people.

As LAFD already serves the Project site, response times would not be affected by the Project. The proposed Project would not generate the need for a new fire station. In addition, the Project would be required to comply with LAFD and City of Los Angeles Department of Building and Safety regulations for water availability and fire hydrant pressure, and accessibility for firefighting equipment to minimize the threat of fire. The Project would comply with standard design requirements in accordance with the California Building Code, California Fire Code, and local fire department requirements, which include fire sprinklers, fire alarm devices, emergency access, and evacuation procedures. The Project would also include installation of new and upgraded fire alarms, safety and technology upgrades, and life safety and seismic safety upgrades.

Prior to Project approval, site plans would be reviewed by LAFD to ensure safety and access as outlined in SC-PS-1. Additionally, LAUSD has emergency procedures in place to ensure the safety of people on and around schools as outlined in SC-PS-2.[125] Compliance with applicable state, City and LAUSD requirements, including implementation of SC-PS-1 and SC-PS-2, would ensure that no new or expanded fire protection services or facilities would be required. Impacts on fire protection services would be less than significant. No mitigation measures or further evaluation are required.

ii) Police protection?

Less than Significant Impact. The Los Angeles School Police Department (LASPD) is the primary provider of police protection to LAUSD schools, providing security to schools within LAUSD's jurisdiction. LASPD is the largest independent school police department in the United States, with over 410 sworn police officers, 101 non-sworn school safety officers, and 34 civilian support staff dedicated to serving the LAUSD.[126] LASPD's

123 Los Angeles Fire Department. http://www.lafd.org/fire-prevention/schools-churches-institutions. Accessed October 2016.
124 *Ibid.*
125 LAUSD OEHS. "School Upgrade Program Final Environmental Impact Report." http://achieve.lausd.net/ceqa. Adopted by the Board of Education on November 10, 2015., Section 5.15 Public Services.
126 Los Angeles Unified School District, Los Angeles School Police Department. http://achieve.lausd.net/Page/8851. Accessed October 2016.

Northeast Division office oversees operations in the east half of San Fernando Valley, including the Project site.[127]

The LAPD would be the secondary provider of law enforcement services within the Project area and would supplement LASPD. LAPD's Van Nuys Community Police Station provides service in the Project area and is located at 6240 Sylmar Avenue, approximately 2.2 miles from the Project site.[128] LASPD maintains a cooperative working relationship with the LAPD.

Demands for police protection are generated by an increase in the population within a service area rather than by the number of buildings or total building area. Implementation of the proposed Project would not increase enrollment at the LAUSD level or at Grant High School. Furthermore, overall LAUSD enrollment is forecast to decrease by 2.2% over the next ten years. Implementation of the proposed Project would not generate an increased demand for police services. In addition, the Project will comply with LAUSD standards regarding emergency response procedures and school safety, as required. Prior to Project approval, site plans would be reviewed by LAPD and LASPD to ensure safety and access as outlined in SC-PS-1. Additionally, LAUSD has emergency procedures in place to ensure the safety of people on and around schools as outlined in SC-PS-2.[129]

Implementation of SCs SC-PS-1 and SC-PS-2 would ensure that no new or expanded police protection services or facilities would be required. Impacts on police protection services would be less than significant. No mitigation measures or further evaluation are required.

iii) Schools?

No Impact. Implementation of the proposed Project would be limited to improvements at the existing Grant High School campus. Project implementation would not increase the population in the Project area or generate new students at Grant High School. No impact on the provision of schools would occur. No mitigation measures or further evaluation are required.

iv) Parks?

Less Than Significant Impact. The City of Los Angeles Department of Recreation and Parks operates public parks and recreational facilities in the Van Nuys-North Sherman Oaks Community. Public parks and recreational facilities within the community include one community park, three neighborhood parks and two small parks.[130] The nearest public parks and open spaces include the Tujunga Greenbelt located across Lancer Lane along the eastern edge of the site, the Valley Glen Community Park approximately 0.2 mile north of the campus, and the Van Nuys Sherman Oaks Recreational Center located approximately 2.5 miles southwest of the campus (see Section 4.16).

Demand for parks typically increases with housing or population growth in the park's service area. The proposed Project would not directly or indirectly induce any population growth in the Project area. Additionally,

127 Los Angeles Unified School District, Los Angeles School Police Department. http://achieve.lausd.net/Page/8851. Accessed October 2016.
128 Los Angeles Police Department. http://lapdonline.org/pacific_community_police_station. Accessed October 2016.
129 LAUSD OEHS. "School Upgrade Program Final Environmental Impact Report." http://achieve.lausd.net/ceqa. Adopted by the Board of Education on November 10, 2015., Section 5.15 Public Services.
130 City of Los Angeles, Van Nuys-North Sherman Oaks Community Plan. http://planning.lacity.org/complan/pdf/vnycptxt.pdf. Accessed in October 2016.

Grant High School has its own athletic playfields and recreational facilities for use by its students, which would be enhanced with implementation of the Project.

During construction, some community activities that might have otherwise used the recreational facilities at Grant High School might be diverted to the surrounding recreational facilities. However, these diversions would be temporary. Based on these combined factors, the proposed Project will have a less than significant impact to existing parks and recreational facilities. No mitigation measures or further evaluation are required.

v) Other public facilities?

No Impact. The LAUSD is served by two library systems: the Los Angeles City Public Library and the County of Los Angeles Public Library. The Los Angeles City Public Library provides library services within the community of Van Nuys-North Sherman Oaks. It has 72 branch libraries, including the Central Library in downtown Los Angeles. The community is served primarily by the Van Nuys Community Branch Library, located at 6250 Sylmar Avenue, approximately 2.2 miles northwest of the Project site.[131]

Demands for other public services and facilities such as libraries are generated by an increase in population in the facilities' service areas. Project implementation would not increase current student enrollment at Grant High school or generate population growth in the Project area. Therefore, the Project would not generate an increased demand for additional public facilities (including libraries) and no new or physically altered government or public facilities would be required as a result of project implementation. No impacts would occur. No mitigation measures or further evaluation are required.

[131] City of Los Angeles, Van Nuys-North Sherman Oaks Community Plan. http://planning.lacity.org/complan/pdf/vnycptxt.pdf. Accessed October 2016

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?	☐	☐	☒	☐

4.16.1 Summary of Impacts

The Program EIR evaluated the potential for implementation of SUP-related projects to impact existing recreation facilities and parks in the LAUSD region, due to increased demand of adverse effect on the environment from the provision of new and/or expanded recreational facilities.

According to the Program EIR, projects implemented under the SUP are anticipated to have no impacts on parks and recreational facilities in the LAUSD region. Therefore, the Program EIR does not include SCs for minimizing impacts on parks and recreational facilities.

The Project-specific analysis provided in Section 4.16 concludes that implementation of the Grant High School Modernization Project would have less than significant impacts on existing parks and recreation facilities in the Project area, and no impact on the need for new and/or expanded park or recreational facilities.

4.16.2 Impact Analysis

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?

Less Than Significant Impact. The City of Los Angeles Department of Recreation and Parks operates public parks and recreational facilities in the community of Van Nuys-North Sherman Oaks. Public parks and recreational facilities within the community include one community park, three neighborhood parks and two small parks.[132] The nearest public parks and open spaces include the Tujunga Greenbelt located across Lancer Lane along the eastern edge of the Grant High School campus, the Valley Glen Community Park located approximately 0.2 mile north of the campus and the Van Nuys Sherman Oaks Recreation Center located approximately 2.5 miles southwest of the campus (see Figure 4.16-1).

Demands on park and recreational facilities are typically generated by an increase in population in the park's service area. The proposed Project would not increase the population in the area, as it consists of replacement, modernization and repair of buildings and other infrastructure on the existing Grant High School Campus. The Project is not designed or intended to result in an increase in student capacity. In addition, Grant High

[132] City of Los Angeles, Van Nuys-North Sherman Oaks Community Plan. Internet URL: http://planning.lacity.org/complan/pdf/vnycptxt.pdf. Accessed in October 2016.

School has its own athletic fields and recreational facilities for use by its students, which would be enhanced with implementation of the Project. During construction, some community activities that might have otherwise used the recreational facilities at Grant High School might be diverted to nearby recreational facilities. However, these uses would be temporary. Based on these combined factors, the proposed Project will have a less than significant impact on existing parks and recreational facilities. No mitigation measures or further evaluation are required.

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?

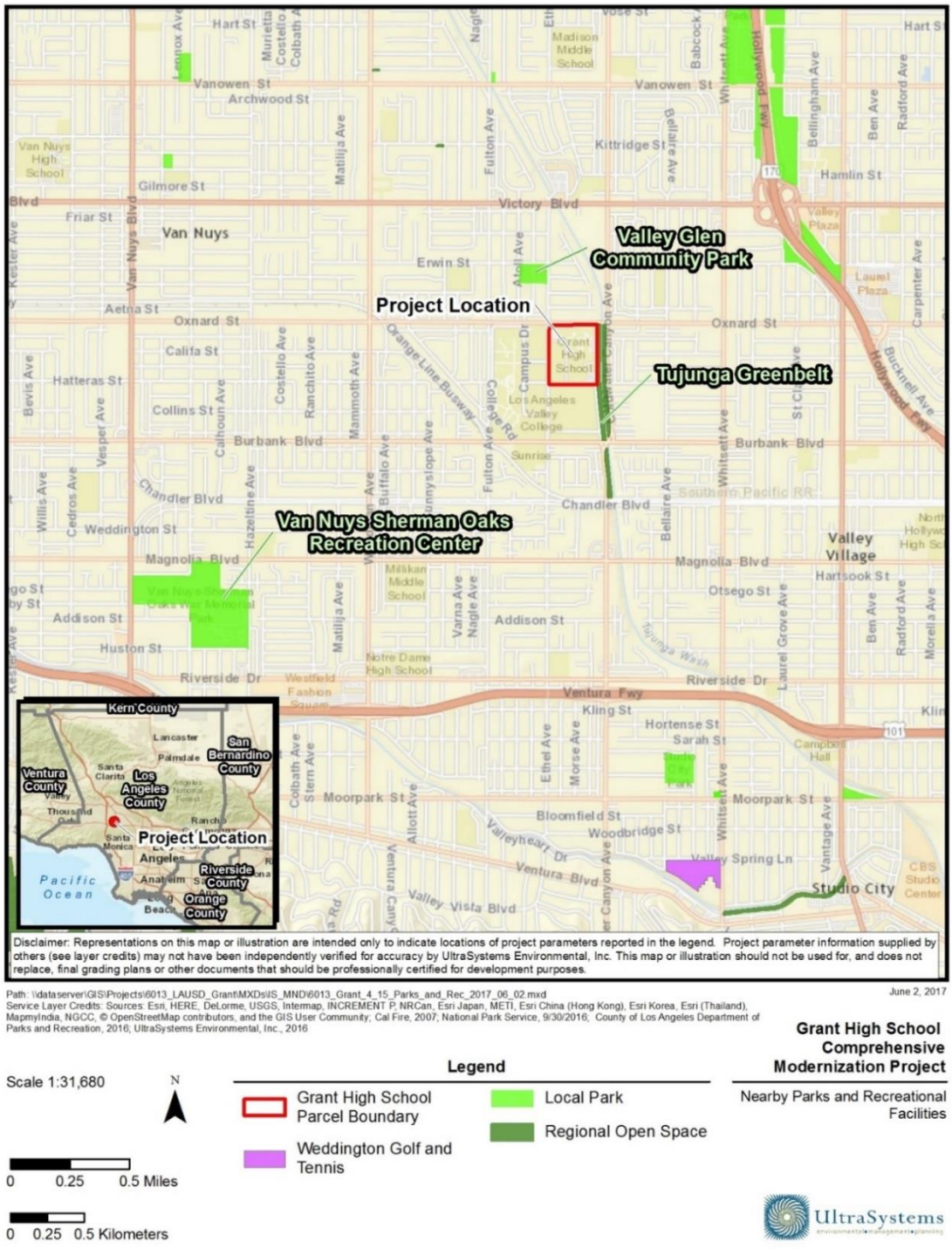
Less Than Significant Impact. The proposed Project would not result in the need for development of additional recreational facilities outside of LAUSD-owned properties. Grant High School has existing athletic and recreational facilities including a multipurpose room, a gymnasium, a track and softball field, an asphalt playground, tennis courts, and a practice field. With implementation of the Project, the existing gymnasium and multipurpose room building would be retrofitted and new practice and competitive facilities would be constructed. As discussed in Sections 4.1 through 4.19 of this Initial Study/MND, construction and improvement of these facilities would not result in any significant environmental impacts.

In accordance with the provisions of CCR, Title 5,[133] California Education Code § 38130–38139 and Civic Center Act,[134] public school facilities such as gyms, playing fields, stadiums, auditoriums, multipurpose rooms, cafeterias, and classrooms may be permitted by LAUSD for public use within designated times outside of school hours. Therefore, improvement of existing recreation facilities at Grant High School would have a positive impact on the availability of recreational facilities in communities near the Project. The Project would not result in any unique impacts to recreational resources or require expansion of existing facilities. No significant impacts would occur. No mitigation measures or further evaluation are required.

133 California Department of Education. California Code of Regulations Title 5. http://www.cde.ca.gov/ls/fa/sf/title5regs.asp. Accessed March 2017.

134 California Legislative Information. California Education Code Sections 38130 – 38139. Civic Center Act. https://leginfo.legislature.ca.gov/faces/codes_displayText.xhtml?lawCode=EDC&division=3.&title=2.&part=23.&chapter=4.&article=2. Accessed March 2017.

Figure 4.16-1
NEARBY PARKS AND RECREATIONAL FACILITIES



4.17 Transportation and Traffic

A Project-specific traffic study was conducted to identify potential traffic-related impacts associated with the peak construction activities related to the proposed Project (see Appendix G.) The findings of that study are incorporated into the following impact analysis.

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?	☐	☐	☐	☒
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?	☐	☐	☒	☐

4.17.1 Summary of Impacts

A Project-specific traffic study was conducted to identify potential traffic-related impacts associated with the peak construction activities related to the proposed Project (see Appendix G.) The findings of that study are incorporated into the following impact analysis.

The Program EIR evaluated the potential for implementation of SUP-related projects to result in impacts related to transportation and traffic. The Program EIR includes SCs for minimizing impacts on transportation and traffic in areas where future projects would be implemented under the SUP. Applicable SCs related to transportation and traffic are provided in Table 4.17-1 and Section 8.0.

Table 4.17-1
TRANSPORTATION AND TRAFFIC STANDARD CONDITION OF APPROVAL

Applicable SCs	Description
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 Caltrans, applicable transportation related safety measures shall be implemented during construction.

The Project-specific analysis provided in Section 4.17 concludes that implementation of the Grant High School Project would have either no impacts or less than significant impacts on transportation and traffic in the surrounding community.

4.17.2 Impact Analysis

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?

Less Than Significant Impact. The Grant High School campus is bound by Oxnard Street to the north, Lancer Lane (an onsite access road) to the east, Hatteras Street to the south, and Ethel Avenue to the west. Coldwater Canyon Avenue and the Tujunga Wash concrete channel parallel Lancer Lane to the east. The area north of the campus is zoned low-medium density multi-family residential and single-family residential. The areas to the south and west are zoned as Public Facilities (Los Angeles Valley College). The area immediately east of the campus is a green belt, zoned as Open Space that borders the Tujunga Wash concrete channel. The area east of the Tujunga Wash and east of Coldwater Canyon Avenue is zoned single-family and low-medium density multi-family residential.

Street System

Characteristics of the existing street system in the proposed Project vicinity are shown in Table 4.17-2. Vehicular and pedestrian access to Grant High School is provided via Oxnard Street, Burbank Boulevard, Coldwater Canyon Avenue, Ethel Avenue, Lancer Lane and Hatteras Street. These access routes would not change as a result of the proposed Project.

Table 4.17-2
EXISTING STREET SYSTEM

Roadway	Street Classification[1]	Posted Speed Limit (MPH)	Number of Travel Lanes	Parking	Sidewalks	Bicycle Lanes
Oxnard Street	Avenue II	35	4	On some segments	Yes	No
Burbank Boulevard	Boulevard II	35	4 - 5	On some segments	Yes	Yes
Coldwater Canyon Avenue	Avenue II	35	4	On some segments	On some segments	Yes Separate Path
Ethel Avenue	Collector	25-30	2	On some segments	On some segments	No
Lancer Lane	Local/Other Streets	25	2	On some segments	On some segments	No
Hatteras Street	Local/Other Streets	25	2	On north side only	Yes	No

MPH = miles per hour
[1] Classification Information from City of Los Angeles Mobility Plan 2035.

Traffic Volumes

According to the Project traffic study, existing weekday AM and PM peak hour traffic volumes were used to evaluate existing traffic conditions in the vicinity of the proposed Project. The following roadway segments were counted, and their average daily traffic (ADT) counts are as follows:

- Oxnard Street, from Ethel Avenue to Lancer Lane: 35,600 ADT
- Coldwater Canyon Avenue, from Oxnard Street to Hatteras Street: 20,700 ADT

Intersection Operations

Level of Service (LOS) analyses were prepared for the Project construction year (2019) conditions (2019 without-project) per Los Angeles Department of Transportation (LADOT) requirements and are shown in Table 4.17-2**,** Project Construction Year (2019) Without Project Weekday Peak Hour Intersection LOS. The operating condition of study intersections and the individual turning movements are described alphabetically with a range of LOS A through F. LOS A indicates free-flow traffic and LOS F indicates extreme congestion and long vehicle delays.[135]

Table 4.17-3
PROJECT CONSTRUCTION YEAR (2019) WITHOUT-PROJECT WEEKDAY PEAK HOUR INTERSECTION LOS

Intersection	AM Peak		PM Peak	
	V/C[1]	LOS[2]	V/C[1]	LOS[2]
1. Ethel Avenue/Oxnard Street	0.624	B	0.510	A
2. Ethel Avenue/Burbank Boulevard	0.518	A	0.440	A
3. Lancer Lane/Oxnard Street	0.751	C	0.656	B
4. Coldwater Canyon Avenue/Oxnard Street	0.818	D	0.729	C
5. Lancer Lane/Hatteras Street	0.159	A	0.155	A

[135] At signalized and unsignalized intersections, LOS was calculated using the Los Angeles Department of Transportation (LADOT) Critical Movement Analysis (CMA) method utilizing the intersection volume over capacity (V/C) ratio. LOS at intersections is measured based on the V/C ratio of the intersection's overall capacity.

Intersection	AM Peak		PM Peak	
	V/C[1]	LOS[2]	V/C[1]	LOS[2]

[1] Level of Service, based on LADOT CMA methodology
[2] Volume-to-capacity ratio

As shown in Table 4.17-2**,** the studied intersections in the vicinity of the proposed Project, currently operate at LOS D or better during the weekday AM and PM peak hours under existing without-Project conditions.

Public Transit

Public transit service in the Project study area is provided by the Los Angeles County Metropolitan Transportation Authority (Metro) and the LADOT[136] The Project site is served by Metro Routes 154, 156, 167, 656, LADOT Commuter Express Route 549, and LADOT Dash Van Nuys/Studio City, with stops along Burbank Boulevard, Oxnard Street and Coldwater Canyon Avenue. These routes vary in service with most routes providing services everyday with reduced weekend hours, resulting in trips originating every half hour, except Metro Route 154 and LADOT Commuter Express Route 549 which are primarily weekday work commuting routes. The campus is also served by the Metro Orange Line (a dedicated bus line) that includes stops near the intersection of Oxnard Street and Woodman Avenue, and near the intersection of Burbank Boulevard and Fulton Street. Both of these Metro Orange Line stops are approximately 0.5 mile from the Grant High School Campus.

Operation

The proposed Project would include modernizing, constructing, and renovating buildings and infrastructure within the Grant High School campus. The Project would be constructed entirely within the existing Grant High School campus. The proposed Project would not increase the number of students at Grant High School, nor would it add additional uses. Therefore, the Project would not generate new (permanent) trips (traffic) in the study area during the operation phase and no impacts would occur.

Construction

Project construction-related activities include demolition of some existing buildings, construction of new buildings, and upgrades to campus infrastructure and facilities.
Construction activities are anticipated to begin in mid-January, 2019, with completion expected in mid-January, 2022
. The additional traffic generated by the construction activities would temporary, and would last through the phases of the conservatively estimated 36-monthconstruction period.

Trip Generation

Trip generation for the peak construction phase was determined based on the anticipated construction characteristics approved by LAUSD for the proposed Project. Per LAUSD, each phase of construction would have construction hours of 7:00 a.m. to 5:00 p.m., in one shift, during the weekdays. Approximately fifty construction workers would arrive at the site at the start of the AM peak hour (7:00 a.m.). In addition, there would be on average 35 haul trucks per day, and eight other combined-use construction trucks per day. For the purpose of this analysis, it was assumed that seven haul trucks and eight other combined-use trucks would

136 Los Angeles County Metropolitan Transportation Authority. www.metro.net/.

arrive and depart the Project site in the AM peak hour, and equally during the PM peak hour. These truck trips were adjusted with a Passenger-Car Equivalence (PCE) factor of 2.0 PCE.

According to the Project traffic study, the peak construction activities would generate approximately 272 daily PCE trips, including 80 AM PCE peak hour trips (74 inbound and 6 outbound), and 80 PM PCE peak hours trips (6 inbound and 74 outbound). Refer to Appendices G and H for detailed information regarding trip generation during Project construction.

Traffic Volumes

The 2019 with-Project (peak construction phase) traffic volume was determined by adding the estimated new Project trips to the Project construction year (2019) without-Project trip volumes. Since Project-related daily construction traffic is relatively low (less than one percent) and largely focused along Oxnard Street, the addition of 272 PCE ADT will not have an impact on the existing average daily traffic volume along studied roadway segments, including Oxnard Street, Burbank Boulevard, Coldwater Canyon Avenue, Ethel Avenue, Hatteras Street and Lancer Lane. The Project would be construction entirely within the existing Grant High School campus. The Project and construction of the Project will not affect or conflict with plans, ordinances or policies related to the operational effectiveness of the existing roadway system.

Intersection Operations

Level of Service analyses were prepared for the Project construction year (2019) conditions (2019 without-Project) per LADOT requirements and are shown in Table 4.17-3. The operating conditions of study intersections and their individual turning movements are described alphabetically with a range of LOS A through F. LOS A indicates free-flow traffic and LOS F indicates extreme congestion and long vehicle delays.[137]

The Project traffic impact analysis focused on the weekday a.m. (7:00 a.m. to 9:00 a.m.) peak period and the PM (4:00 p.m. to 6:00 p.m.) peak period. These periods represent the highest cumulative total traffic for the adjacent street system. The study intersections (listed below) included five major intersections that provide immediate access to the proposed Project and are the locations that are most likely to be impacted by the Project.

1. Ethel Avenue/Oxnard Street
2. Ethel Avenue/Burbank Boulevard
3. Lancer Lane/Oxnard Street,
4. Coldwater Canyon Avenue/Oxnard Street
5. Lancer Lane/Hatteras Street

The study intersections were analyzed for the following study scenarios: (1) Construction year (2019) Condition; and, (2) 2020 With-Project (Peak Construction Activity) Condition.

The intersection operations analysis conducted for the study area evaluated the 2019 with-Project (peak construction phase) weekday AM and PM peak hour conditions with the proposed Project. Table 4.17-3 provides a comparison between the Existing without- and with-Project conditions for the weekday AM and PM peak hours.

[137] At signalized and unsignalized intersections, LOS was calculated using the Los Angeles Department of Transportation (LADOT) Critical Movement Analysis (CMA) method utilizing the intersection volume over capacity (V/C) ratio. LOS at intersections is measured based on the V/C ratio of the intersection's overall capacity.

Table 4.17-4
PROJECT CONSTRUCTION YEAR (2019) AND 2020 WITH-PROJECT PEAK HOUR INTERSECTION LEVEL OF SERVICE

Intersection	Project Construction Year (2019)				2020 Plus Project				V/C Change		Impact	
	AM Peak		PM Peak		AM Peak		PM Peak					
	V/C[1]	LOS[2]	V/C[1]	LOS[2]	V/C[1]	LOS[2]	V/C[1]	LOS[2]	AM	PM	AM	PM
1. Ethel Ave/ Oxnard St	0.624	B	0.510	A	0.656	B	0.528	A	0.032	0.018	No	No
2. Ethel Ave/ Burbank Blvd	0.518	A	0.440	A	0.528	A	0.443	A	0.010	0.003	No	No
3. Lancer Lane/ Oxnard St	0.751	C	0.656	B	0.775	C	0.676	B	0.024	0.020	No	No
4. Coldwater Canyon Ave/ Oxnard St	0.818	D	0.729	C	0.828	D	0.730	C	0.010	0.001	No	No
5. Lancer Lane/ Hatteras St	0.159	A	0.115	A	0.178	A	0.127	A	0.019	0.012	No	No

[1] Level of Service, based on LADOT CMA Methodology
[2] Volume-to-capacity ratio

As shown in Table 4.17-3, all study intersections are forecast to continue to operate at LOS D or better during the AM and PM peak hours in the 2019 with-Project condition. Furthermore, for all study intersections the Project-added V/C increase is less than 0.040 V/C (at LOS C), or 0.020 V/C (at LOS D).[138] As with the Project construction year (2020) without-Project conditions, no study intersections would operate at LOS E or F under the 2020 with-Project conditions. Therefore, there would be no significant traffic impacts at the study area intersections with the addition of Project construction traffic.

Project construction and operation would not affect or conflict with plans, ordinances or policies related to the operational effectiveness of the existing roadway system. With the implementation of SC-T-4, (temporary) construction-related traffic impacts to the study area intersections, and vehicular and pedestrian access points would be less than significant. No mitigation measures or further evaluation are required.

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?

Less Than Significant Impact. The Los Angeles County Congestion Management Program (CMP) requires evaluation of CMP arterial monitoring intersections when a project would add 50 or more new peak hour trips. The nearest CMP monitoring intersection is Victory Boulevard/Woodman Avenue, approximately one mile from the Project site. Due to the location of this intersection and its distance from Grant High School, it is unlikely that the Project would add 50 peak hour trips to this location during construction. Similarly, the CMP requires CMP freeway mainline monitoring locations to be evaluated when a project would add 150 or more trips at a monitoring location. The nearest CMP freeway monitoring station is located approximately 1.5 miles from the Project site on the 101 Freeway at Coldwater Canyon Avenue. The Project would not add 150

[138] The LADOT has adopted the following significance criteria to assess whether the addition of project trips would cause a significant impact on study area intersections: A significant impact would occur if the project increases the V/C ratio at a study area intersection as shown below.

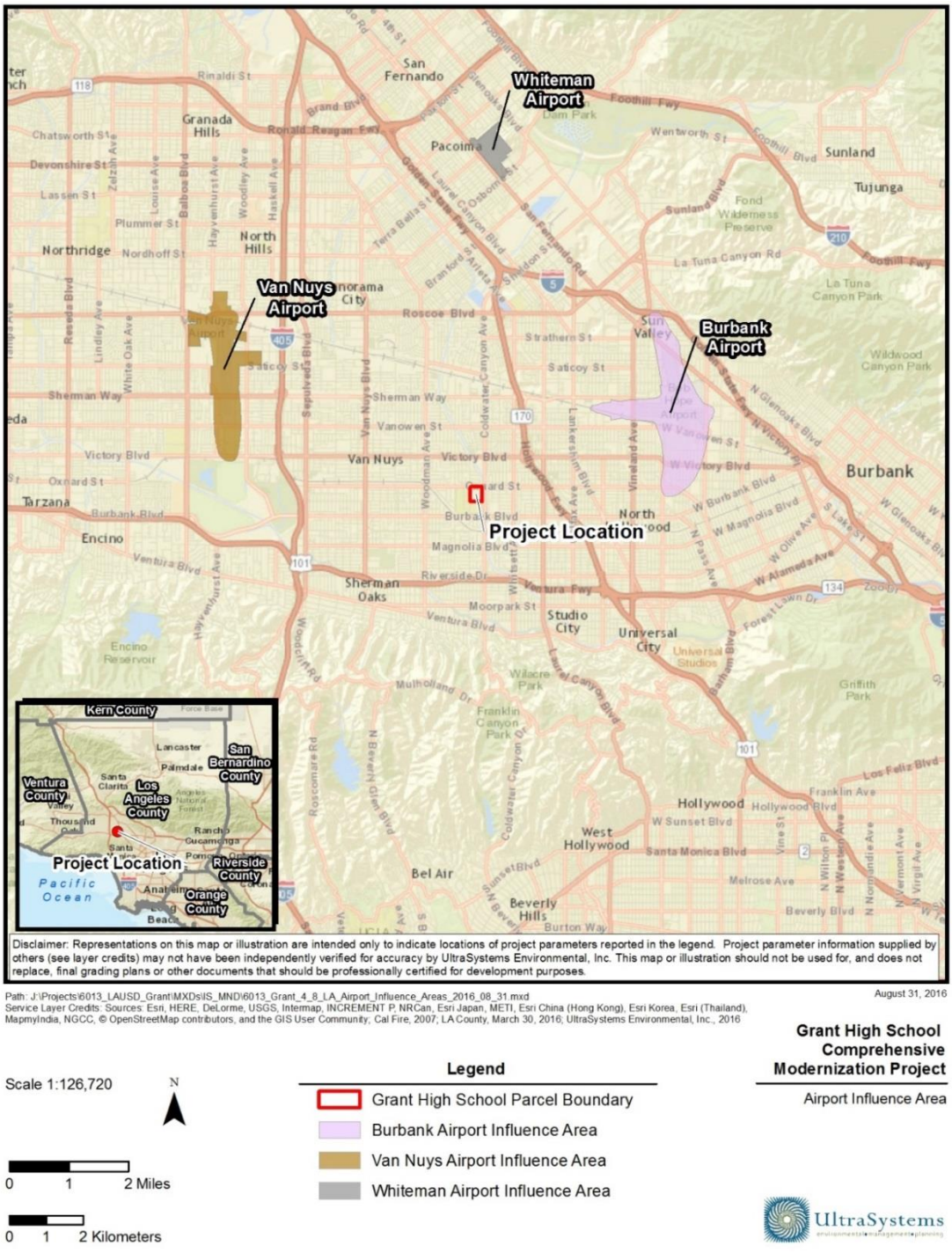
With-Project LOS	Project-Related Increase in V/C Ratio
LOS C	equal to or greater than 0.040
LOS D	equal to or greater than 0.020
LOS E, F	equal to or greater than 0.010

peak hour trips at this CMP freeway monitoring station. Based on the Project location and trip generation, no CMP arterial intersection or freeway mainline monitoring stations are required to be included in the analysis, and Project-related peak hour trips at these CMP monitoring locations would be less than significant. No mitigation measures or further evaluation are required.

c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location, which results in substantial safety risks?

No Impact. As discussed in Section 4.8, Burbank (Bob Hope) Airport is located approximately 3.5 miles northeast of the Grant High School campus, Van Nuys Airport is located approximately 4.5 miles northwest of the campus, and Whiteman Airport is located approximately 5.5 miles north of the campus. The flight patterns for landing and take-off from the three airports are not in the general vicinity of Grant High School and do not cross over the campus (Figure 4.17-1); and the campus is not located within the designated airport influence areas for these three airports.

Figure 4.17-1
AIRPORT INFLUENCE AREA FOR VAN NUYS, BOB HOPE AND WHITEMAN AIRPORTS MAP



d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses?

No Impact. The Project is located on an existing school campus and does not include physical changes to roadways or intersection in the vicinity of the project site. Therefore, the project would not result in a substantial increase in roadway hazards and no impact would occur. No mitigation measures or further analysis is required.

e) Result in inadequate emergency access?

No Impact. The Project is located on an existing school campus and does not include changes to roadways or intersection in the vicinity of the project site, except for conversion of two-way flow to one-way flow on Lancer Lane, and does not included changes to the roadway access to the project site. Therefore, the Project would not result in a change to existing emergency access to the site, nor does it result in a change to existing emergency access on the site. The construction contractor shall prepare and implement a worksite traffic control plan through SC-T-4 that would ensure emergency access to the site and the site is managed and maintained throughout the construction period. No impact would occur. No mitigation measures or further analysis is required

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?

Less Than Significant Impact. The Project is located on the site of an existing school campus and does not include changes to existing public transit, bicycle or pedestrian facilities. The Project site has no publicly accessible throughways. As discussed in Section 4.17.2.1, the Project site is served by Metro Routes 154, 156, 167, 656, LADOT Commuter Express Route 549, and LADOT Dash Van Nuys/Studio City with stops along Burbank Boulevard, Oxnard Street and Coldwater Canyon Avenue. The campus is also served by the Metro Orange Line (a dedicated bus line) that includes stops near the intersection of Oxnard Street and Woodman Avenue, and near the intersection of Burbank Boulevard and Fulton Street. Operation of the proposed Project would not affect existing transit routes or bus facilities in the Project area, and would not conflict with any plans or policies related to these travel modes. Therefore, the project would not result in a change to public transit, bicycle, or pedestrian facilities routes to the campus, or otherwise decrease the performance or safety of such facilities.

Pedestrian access to the school during the construction phase would be minimally altered and any temporary changes to pedestrian access during construction would be completed as outlined in a worksite traffic control plan for the proposed Project (per SC-T-4). The Project does not include changes to existing roadways or study area intersections or public transit, bicycle or pedestrian facilities in the vicinity of the Project site. With the implementation of SC-T-4, (temporary) construction-related impacts to pedestrian access points would be less than significant. For these reasons, the Project would not conflict with policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities and impacts would be less than significant. No mitigation measures or further analysis is required.

4.18 Tribal Cultural Resources

Appendix H, Phase I Cultural Resources Survey provides an assessment of Tribal Cultural Resources as they relate to the proposed Project.

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?	☐	☐	☐	☒

4.18.1 Summary of Impacts

The Program EIR includes SCs for minimizing impacts on cultural resources which are applicable to tribal cultural resources in areas where projects would be implemented under the SUP. Applicable SCs related to Tribal Cultural Resources are provided in Table 4.18-1.

Table 4.18-1
Tribal Cultural Resources Standard Condition of Approval

Applicable SCs	Description
SC-TCR-1	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.

4.18.2 Impact Analysis

a) Would the proposed project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code § 21074 as either a site, feature, place, or 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 is:

- **Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code § 5020.1(k), or**

- **A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public**

Resources Code § 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code § 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

Less than Significant Impact. Assembly Bill 52 requires meaningful consultation with California Native American Tribes on potential impacts to tribal cultural resources (TCRs), as defined in PRC § 21074. Tribal cultural resources are sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either eligible or listed in the California Register of Historical Resources or local register of historical resources.[139]

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

To date the District has not received any Tribal requests to be notified about projects within the District. No sites were documented in the NAHC's Sacred Lands File search. The NAHC identified a list of seven local Native American Tribes to contact and to date three responses have been received but no resources as defined by Public Resources Code § 21074 have been identified (Attachment C of Appendix H). Additionally, the Project site has not been recommended for historic designation for prehistoric and tribal cultural resources. No specific Tribal resources have been identified. LAUSD would implement SC-TCR-1**,** which requires consultation of a qualified archaeologist and the local Native American representative if unanticipated discoveries are made during construction activities. Impacts to tribal cultural resources would be less than significant. No mitigation measures or further analysis is required.

b) Would the project cause a substantial adverse change in the significance of a tribal cultural resource that is determined to be a significant resource to a California Native American tribe pursuant to the criteria set forth in subdivision (c) of Public Resource Code § 5024.1(c)?

No Impact. LAUSD has not received any requests for notification or consultation from California Native American tribes regarding resources defined by Public Resources Code § 21074 for the proposed project. There is no substantial evidence that Tribal Cultural Resources are present on the Project site. Therefore, the proposed Project would not be expected to result in an impact related to tribal cultural resources. No mitigation measures or further analysis is required.

[139] California Natural Resources Agency (CNRA), 2007. The California Environmental Quality Act (CEQA). Guidelines for Implementation of the California Environmental Quality Act. Electronic document.

4.19 Utilities and Service Systems

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?	☐	☐	☐	☒

4.19.1 Summary of Impacts

The Program EIR includes SCs for minimizing impacts on utilities and service systems in areas where future projects would be implemented under the SUP. Applicable SCs related to utilities and service systems associated with the project are provided in Table 4.19-1 and Section 8.0.

TABLE 4.19-1
UTILITIES AND SERVICE SYSTEMS STANDARD CONDITIONS OF APPROVAL

Applicable SCs	Description
SC-USS-1	**School Design Guide.** Construction and demolition waste shall be recycled to the maximum extent feasibility. LAUSD has established a minimum non-hazardous construction and demolition debris recycling requirement of 75% by weight as defined in Specification 01340 Construction & Demolition Waste Management. **Guide Specification 2004 – Section 01340, Construction & Demolition Waste Management.** This section of the LAUSD Specifications includes procedures for preparation and implementation, including reporting and documentation, of a Waste Management Plan for reusing, recycling, salvage or disposal of non-hazardous waste materials generated during demolition and/or new construction (Construction & Demolition (C&D) Waste), to foster material recovery and re-use and to minimize disposal in landfills. Requires the collection and separation of all C&D waste materials generated on-site, reuse or recycling on-site, transportation to approved recyclers or reuse organizations, or transportation to legally designated landfills, for the purpose of recycling salvaging and/or reusing a minimum of 75% of the C&D waste generated.

Project-specific analysis provided in Section 4.19.2 concludes that implementation of the proposed Project would have less than significant impacts or no impacts on utilities and service systems.

4.19.2 Impact Analysis

a) Would the project exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board (RWQCB)?

Less Than Significant. The Project site is served by an existing sewer collection and conveyance system, and wastewater treatment services are provided and maintained by the City of Los Angeles Bureau of Sanitation. The Project site is within the Hyperion Treatment System, which includes the Hyperion Treatment Plant (HTP), the Tillman Water Reclamation Plant and the Los Angeles-Glendale Water Reclamation Plant. The HTP is designed to treat 450 million gallons of wastewater per day (mgd), while average daily flows are 300 mgd.[140] The City of Los Angeles Bureau of Sanitation also provides solid waste collection services for the Ulysses S. Grant High School.

The water purveyor to the City of Los Angeles is the Los Angeles Department of Water and Power (LADWP). The LADWP obtains water supplies from four sources: the Los Angeles Aqueduct, water provided by the Metropolitan Water District of Southern California, local groundwater, and recycled water.

The Los Angeles County storm drain system consists of channels, drains, debris basins, and catch basins owned and maintained by the Los Angeles County Flood Control District, the City of Los Angeles, and U.S. Army Corps of Engineers. The primary drainage channel in the Northwest and Northeast Los Angeles Basin (within the Los Angeles River Watershed), in which the campus is located, is the Los Angeles River.

As with existing conditions at the Project site, all wastewater that would be generated by the proposed Project would be treated at the HTP. The Project site is an existing school and the improvements associated with the proposed Project would not develop new or alternative land uses requiring wastewater treatment requirements separate from municipal wastewater treatment. Compliance with requirements for discharges to municipal storm water systems are addressed in Section 4.9.

Construction of the proposed Project would include the necessary on- and off-site sewer pipe improvements and connections to adequately connect to the City's existing sewer system. The Project would not generate sewer flows that would jeopardize the ability of the HTP to operate within its established wastewater treatment requirements. The District has a program-wide SWPPP, which was developed in 2005 and updated in 2007 and 2009. LAUSD's construction contracting protocols for new or existing sites which would undergo land disturbance provide BMPs required to prevent or minimize stormwater pollution, including submission of a SWPPP[141] to the Los Angeles RWQCB. With adherence to LAUSD SCs and applicable regulations, adverse impacts to stormwater quality would be avoided through implementation of BMPs recommended for such construction activity. Project operation would not result in an exceedance of wastewater treatment requirements, as the proposed Project is not designed to, and would not increase the school's capacity. As a result, the Project would not exceed the requirements of the RWQCB, and impacts would be less than significant. No mitigation measures or further analysis is required.

[140] City of Los Angeles Bureau of Sanitation, Sewer System Management Plan, Hyperion Sanitary Sewer System, February 2015.
[141] LAUSD OEHS. "School Upgrade Program Final Environmental Impact Report." http://achieve.lausd.net/ceqa. Adopted by the Board of Education on November 10, 2015., at pages 5.9-7 to 5.9-9.

b) Would the project 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?

No Impact. The proposed Project would not expand the capacity of existing water or wastewater treatment facilities and would not increase the school's capacity; therefore, the demand for water and wastewater service would not increase as a result of the Project. The existing campus is connected to the existing water and wastewater treatment facilities and while the on-site facilities may be improved, the campus would continue to use the existing offsite facilities following completion of the Project. Therefore, the proposed Project would not require construction of new or expanded water treatment facilities or wastewater treatment facilities. No impact would occur. No mitigation measures or further analysis is required.

c) Would the project 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?

Less Than Significant. The proposed Project would include stormwater BMPs for construction and operations that would be adequately designed to accommodate site runoff so that it would not adversely impact downstream storm drain facilities or provide substantial additional sources of polluted runoff. The proposed Project would include design elements to improve the on-site stormwater drainage system, including site-wide utility upgrades and permeable features. In addition, California Government Code § 53097 requires school districts to comply with city and county ordinances regulating drainage improvements, and requires review and approval of grading plans as they relate to design and construction of on-site improvements that affect drainage. The District would comply with § 53097 in implementing the proposed project. This compliance would ensure that the proposed project would not 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. Impacts would be less than significant. No mitigation measures or additional analysis is required.

d) Would the project have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?

No Impact. The proposed Project would not increase student capacity at Grant High School. Therefore, and as previously noted in the response to Checklist Question b), following construction of the Project, the campus would not result in a new or increased demand for water; therefore, the proposed project would not require new or expanded water supplies. No impact would occur. No mitigation measures or further analysis is required.

e) Would the project 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?

No Impact. The proposed Project would not expand the capacity of Grant High School and would not expand District enrollment; therefore, the proposed Project would not require new or expanded wastewater treatment capacity. No impact would occur. No mitigation measures or further analysis is required.

f) Would the project be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?

Less Than Significant. The proposed Project would comply with the recycling requirement in AB 341. During construction and demolition, the Project would comply with the construction and demolition (C&D) waste recycling/reuse requirement in California Green Building Standards Code § 5.408, and LAUSD Specification 01340, Construction & Demolition Waste Management, as detailed under SC-USS-1. SC-USS-1 requires the collection and separation of all C&D waste materials generated on-site, reuse or recycling on-site, transportation to approved recyclers or reuse organizations, or transportation to legally designated landfills, for the purpose of recycling salvaging and/or reusing a minimum of 75% of the C&D waste generated.

The proposed Project would not expand capacity or District enrollment; therefore, during operation it would not expand solid waste generation above existing conditions. Incorporation of SC-USS-1 would ensure that impacts regarding solid waste would be less than significant. No mitigation measures or further analysis is required.

g) Would the project comply with federal, state, and local statutes and regulations related to solid waste?

No Impact. The proposed Project will comply with LAUSD, federal, state, and local statutes and regulations related to solid waste. During construction of the proposed Project, LAUSD would require its contractors to reuse, recycle, salvage or dispose of non-hazardous waste materials generated during demolition and construction, to foster material recovery and reuse, and to minimize disposal in landfills. With the incorporation of SC-USS-1, there would be no impacts during construction and operation of the Project. Furthermore, the proposed Project will comply with city, county, and state solid waste diversion, reduction, and recycling mandates; thereby, ensuring that there would be no impact in solid waste management. No impact would occur. No mitigation measures or further analysis 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?	☐	☐	☒	☐

4.20.1 Summary of Cumulative Impacts Identified in the Certified LAUSD School Upgrade Program EIR

The Program EIR analyzed the environmental impacts associated with cumulative development pursuant to future development that would be planned, constructed, and operated under the SUP. It addressed the cumulative impacts of school-related development within the entire 710-square-mile school district. According to the Program EIR, for projects implemented under the SUP, for most environmental resource areas, such as traffic and historic resources, the potential for cumulative impacts would be contiguous with the District boundary, since all schools and students attending those schools reside within the District. Other impacts would be site-specific, such as aesthetics, and geology and soils; and still others may have impacts outside the district boundaries, such as air quality.

4.20.2 Impacts Associated with the Proposed Project

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?

Less than Significant Impact. Based on the information provided in Sections 4.4 and 4.5 of this IS/MND, the proposed Project would not substantially degrade the quality of the environment. As the Project site and surrounding area are located in an established and urbanized community, the Project would not significantly impact the habitat or population level of fish or wildlife species, nor would it threaten a plant or animal community, nor impact the range of a Rare or Endangered plant or animal. No important examples of California history or prehistory would be significantly affected by the proposed Project. Implementation of mitigation measure MM-BIO-1 would avoid or reduce potential impacts on nesting/breeding birds to less than significant levels. Other potential impacts related to biological and cultural resources would be reduced

to less than significant levels with incorporation of the required SCs. Compliance with SCs, and other applicable federal, state and City regulations would reduce impacts, if any, to below a level of significance.

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)?

Less than Significant Impact. Cumulative impacts are less than significant for those issues for which it has been determined that the proposed Project would have no impact. Environmental issues meeting this criterion include agricultural resources, land use, and mineral resources. Incorporation of the required SCs, and other applicable federal, state and City regulations would preclude significant cumulative impacts with regard to the remaining environmental issue areas analyzed in this IS/MND. Therefore, no significant cumulatively considerable impacts would occur as a result of the proposed Project.

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

Less than Significant Impact. Based on the documentation provided in Sections 4.1 through 4.19 of this IS/MND, implementation of the proposed Project would not cause environmental effects that cause substantial direct or indirect adverse effects on human beings. Potential impacts related to air quality, biological resources, cultural resources, noise and traffic would be reduced to less than significant levels with incorporation of SCs. For the balance of the environmental issue areas discussed in this IS/MND compliance with SCs and applicable federal, state and City regulations would reduce impacts, if any, below a level of significance.

5.0 LIST OF PREPARERS

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