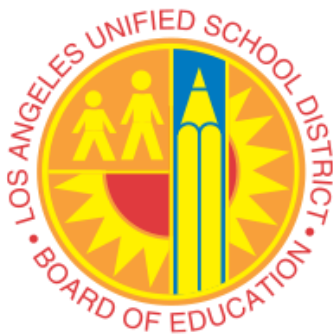


INITIAL STUDY AND NEGATIVE DECLARATION
FOR
**VENICE HIGH SCHOOL COMPREHENSIVE
MODERNIZATION PROJECT**

Prepared for:



Los Angeles Unified School District
Office of Environmental Health and Safety
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Los Angeles, CA 90017

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Project No. 6011

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1.0 INTRODUCTION

1.1 Project

On March 10, 2015, the Los Angeles Unified School District's (LAUSD's or District's) Board approved pre-design and due diligence activities necessary to develop a project definition for a comprehensive modernization project at Venice High School. The comprehensive modernization projects are intended to provide facilities that are safe, secure, and aligned with instructional programs. On February 9, 2016, the Board approved the project definition for the Venice High School Comprehensive Modernization Project ("proposed project" or "project") to provide facilities that are safe, secure, and aligned with the instructional program of Venice High School. The project is designed to address the most critical physical concerns of the building and grounds at the campus while providing renovations, modernizations, and reconfiguration as needed. This approval authorized LAUSD's Facilities Services Division to proceed with project design and the completion of related technical and regulatory processes.

The comprehensive modernization projects are one of many types of projects that were analyzed in the School Upgrade Program (SUP) Environmental Impact Report (Program EIR or PEIR) that was certified by the LAUSD Board of Education (Board) on November 10, 2015. The PEIR's Appendix D, Environmental Analysis discusses the general approach for preparing California Environmental Quality Act (CEQA) compliance analyses and documents for SUP- related projects. LAUSD's Program EIR meets the description of a Program EIR under CEQA Guidelines § 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."¹

As further noted in PEIR Appendix D, the Board-certified Program EIR enables LAUSD to streamline future environmental compliance and reduces the need for repetitive environmental studies. The Program EIR serves as the framework and baseline for CEQA analyses of later projects through a process known as "tiering." Under CEQA Guidelines §§ 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.²

1.1 Project Applicant

Los Angeles Unified School District
333 S. Beaudry Avenue
Los Angeles, CA 90017

1.2 Lead Agency

The Los Angeles Unified School District is the Lead Agency for this project pursuant to the California Environmental Quality Act (CEQA).³ As the Lead Agency, LAUSD has the principal

¹ LAUSD OEHS. "School Upgrade Program Final Environmental Impact Report." <http://achieve.lausd.net/ceqa>. Adopted by the Board of Education on November 10, 2015.

² CEQA Guidelines §§ 15152(a) and 15385.

³ Public Resources Code §§ 21000 - 21177 and California Code of Regulations Title 14, Division 6, Chapter 3.



responsibility for implementing and approving a project that may have a significant effect on the environment.

1.3 CEQA Review

1.3.1 School Upgrade Program EIR

Ongoing master planning activities and facility site assessments conducted for LAUSD facilities have identified school sites throughout the District that exhibit critical physical conditions. The School Upgrade Program implemented by the LAUSD outlines a series of capital improvements intended to rehabilitate and modernize these schools so they are safe, healthy, and functional places to learn.

The PEIR (SCH No. 2013111046) evaluates the direct and indirect environmental effects of the SUP program.⁴ As provided in § 15168 of the State CEQA Guidelines, a Program EIR may be prepared on a series of actions that can be characterized as one large project. Use of a Program EIR provides LAUSD (as lead agency) with the opportunity to consider broad policy alternatives and program-wide measures, and provides the LAUSD with greater flexibility to address project-specific and cumulative environmental impacts on a comprehensive basis.

1.3.2 Tiered Negative Declaration

The Program EIR is applicable to all projects implemented under the School Upgrade Program. It grouped potential projects into four SUP project categories. These categories were based on project scope, type of construction and location of project. This project falls under the following categories: Type 2: New Construction on Existing Campus; Type 3: Modernization, Repair, Replacement, Upgrade, Remodel, Renovation, and Installation; and Type 4: Operational and Other Campus Changes.

The proposed project, as analyzed in this Initial Study, is considered a site-specific project under the Program EIR; therefore, this Negative Declaration is tiered from the Program EIR. OEHS has prepared an Initial Study checklist (see **Section 2.0**) to document the evaluation of the site and the activity to determine whether the environmental effects of the operation were covered in the Program EIR.⁵

The information and analysis contained in this Initial Study is tiered⁶ from the certified Program EIR consistent with State CEQA Guidelines § 15168(c). This Initial Study incorporates by reference the general setting, analysis, mitigation measures, alternatives, and LAUSD Standard Conditions of Approval (**SCs**)⁷ contained in the Program EIR and focuses on the site-specific issues unique to the modernizations and improvements proposed for the Venice High School campus.

⁴ LAUSD OEHS. "School Upgrade Program Final Environmental Impact Report." <http://achieve.lausd.net/ceqa>. Adopted by the Board of Education on November 10, 2015.

⁵ LAUSD OEHS. "School Upgrade Program Final Environmental Impact Report." <http://achieve.lausd.net/ceqa>. Adopted by the Board of Education on November 10, 2015.

⁶ "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 solely on the issues specific to the later project.

⁷ LAUSD Standard Conditions (**SCs**) are guidelines, specifications, practices, policies, and project design features. These **SCs** must be incorporated into projects implemented under the SUP, as appropriate, to avoid or lessen significant impacts.



The Program EIR and related materials are available for review at:

Los Angeles Unified School District
Office of Environmental Health and Safety
333 South Beaudry Avenue, 21st Floor
Los Angeles, CA 90017
(By appointment)

Online at: <http://achieve.lausd.net/ceqa>

1.4 Organization of Initial Study/Negative Declaration

This Initial Study/Negative Declaration (IS/ND) is organized to satisfy CEQA Guidelines § 15063(d), and includes the following sections:

- Chapter 1, *Introduction*, which identifies the purpose and scope of the IS/ND.
- Chapter 2, *Initial Study Checklist*, which presents the CEQA Appendix G Checklist Form including a brief summary of the project, thresholds of significance for different environmental factors, list of environmental factors potentially affected by the project and the determination made by the Lead Agency.
- Chapter 3, *Project Description*, which 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 Analysis*, which presents checklist responses for the environmental factors. This chapter also contains summaries of the findings for the PEIR, and identifies and assesses impacts associated with the proposed project after application of the SCs. For the Venice High School Comprehensive Modernization Project, three planning concepts have been proposed by the Los Angeles Unified School District, and the project activities would be concentrated in four areas of the campus designated as Development Zones 1-4 (representing the areas on the campus that are available for development). This IS/ND evaluates the “worst case” assessment based upon the potential development presented within three design concepts.
- Chapter 5, *References*, which includes a list of documents cited in the IS/ND.
- Chapter 6, *List of Preparers*, which identifies the technical experts, report authors, and supporting personnel.

1.5 Noticing and Review

This Draft IS/ND was made available for public review and comment on March 14, 2017, beginning a 30-day review period. The Notice of Intent to Adopt an IS/ND (NOI), was mailed to owners and occupants of properties within a 0.25-miles of the project site. Copies of the IS/ND was also being distributed, via certified mail, to governmental and regulatory agencies, elected officials, community organizations, and other relevant potential stakeholders and interested parties. The NOI was posted in the classified section of the LA Opinion and Daily Breeze newspapers, at the



❖ INTRODUCTION ❖

Registrar/Recorder Office of the Los Angeles County Clerk, at the State Clearinghouse, project site, on the OEHS website at: <http://achieve.lausd.net/oehs>, and meeting notices were hand delivered to the project site and Mark Twain Middle School and were posted on the websites of three neighborhood councils:

- Mar Vista (http://marvista.org/readpost.php?news_id=460),
- Venice (http://www.venicenc.org/readpost.php?news_id=248), and
- Del Rey (<http://www.delreync.org/>).



2.0 INITIAL STUDY

California Environmental Quality Act INITIAL STUDY CHECKLIST

LEAD AGENCY: Los Angeles Unified School District	SCHOOL SITE: Venice High School Campus	DATE: March 14, 2017
SCHOOL SITE ADDRESS: 13000 Venice Boulevard, Los Angeles, CA 90066		LOCAL DISTRICT: Local District West
PROJECT TITLE: Venice High School Comprehensive Modernization Project		COLIN ID: 10366807

PROJECT DESCRIPTION:
See Section 3.0, Project Description of the Initial Study/Negative Declaration for the Venice High School Comprehensive Modernization Project.

ENVIRONMENTAL SETTING:
See Section 4.0, Environmental Analysis of the Initial Study/Negative Declaration for the Venice High School Comprehensive Modernization Project.

PROJECT LOCATION:
The 28.8-acre existing Venice High School campus, which is located at 13000 Venice Boulevard in the City of Los Angeles, California.

EXISTING ZONING: Venice Community Plan – Public Facility Zone	EXISTING LAND USE DESIGNATION: Public School	<input type="checkbox"/> REQUIRES STATE FUNDING
---	--	--

SURROUNDING LAND USES: Residential and Commercial

OTHER PUBLIC AGENCY APPROVALS: See Table 3.5-1 in Section 3.0, Project Description.

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

Note: Conducting consultation early in the CEQA process allows tribal governments, lead agencies, and project proponents to discuss the level of environmental review, identify and address potential adverse impacts to tribal cultural resources, and reduce the potential for delay and conflict in the environmental review process (see Public Resources Code Section 21083.3.2). Information may also be available from the California Native American Heritage Commission's Sacred Lands File per Public Resources Code Section 5097.94 and the California Historical Resources Information System administered by the California Office of Historic Preservation. Please also note that Public Resources Code Section 21082.3(c) contains provisions specific to confidentiality.⁸

⁸ Final Text for tribal cultural resources update to Appendix G: Environmental Checklist Form. 2016, September 29. The AB 52 regulations adopted by the California Natural Resources Agency were approved by the Office of Administrative Law, and will appear in the California Code of Regulations. Copies of the rulemaking materials can be found at: <http://resources.ca.gov/ceqa>.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

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

- | | | |
|---|--|---|
| <input type="checkbox"/> Aesthetics | <input type="checkbox"/> Greenhouse Gas Emissions | <input type="checkbox"/> Pedestrian Safety |
| <input type="checkbox"/> Agriculture & Forestry Resources | <input type="checkbox"/> Hazards & Hazardous Materials | <input type="checkbox"/> Population & Housing |
| <input type="checkbox"/> Air Quality | <input type="checkbox"/> Hydrology & Water Quality | <input type="checkbox"/> Public Services |
| <input type="checkbox"/> Biological Resources | <input type="checkbox"/> Land Use & Planning | <input type="checkbox"/> Recreation |
| <input type="checkbox"/> Cultural Resources | <input type="checkbox"/> Mineral Resources | <input type="checkbox"/> Transportation/Traffic |
| <input type="checkbox"/> Geology & Soils | <input type="checkbox"/> Noise | <input type="checkbox"/> Utilities & Service Systems |
| | | <input type="checkbox"/> 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 than 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.

ENVIRONMENTAL IMPACTS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
I. AESTHETICS. Would the project:				
a. Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings, or other locally recognized desirable aesthetic natural feature within a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Substantially degrade the existing visual character or quality of the site and its surroundings?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

II. AGRICULTURE AND FORESTRY RESOURCES.

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

a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Conflict with existing zoning for agricultural use, or a Williamson Act Contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. 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 Code § 4526) or timberland zoned Timberland Production (as defined by Government Code § 51104(g))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
d. Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Result in a cumulatively considerable net increase of any criteria pollutant for which the region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Create objectionable odors affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

IV. BIOLOGICAL RESOURCES. Would the project:

a. Have a substantial adverse effect, either directly or through habitat modification, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in the City or regional plans, policies, regulations by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Interfere substantially with the movement of any native	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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 tree preservation policy or ordinance (e.g., oak trees or California walnut woodlands)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

V. CULTURAL RESOURCES: Would the project:

a. Cause a substantial adverse change in significance of a historical resource as defined in State CEQA §15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Cause a substantial adverse change in significance of an archaeological resource pursuant to State CEQA §15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Disturb any human remains, including those interred outside of formal cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Cause a substantial adverse change in the significance of a tribal cultural resource as defined in Public Resources Code section 21074?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii. Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii. Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv. Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Be located on a geologic unit or soil that is unstable, or	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
that would become unstable as a result of the project, and potential result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?				
d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Be located on a site which is included on a list of hazardous materials compiled pursuant to Government Code § 65962.5 and, as a result, would create a significant hazard to the public or the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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 result in a safety hazard for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f. For a project in the vicinity of a private airstrip, result in a safety hazard for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g. Impair implementation of or physically interfere with an adopted emergency response plan or emergency	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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 the urbanized areas or where residences are intermixed with wildlands?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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

a. Violate any water quality standards or waste discharge requirements?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Substantially deplete groundwater supplies or interfere with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned land uses for which permits have been granted)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f. Otherwise substantially degrade water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g. Place housing within a 100-year flood plain as mapped on federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
h. Place within a 100-year flood plain structures which would impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
j. Inundation by seiche, tsunami, or mudflow?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

X. LAND USE AND PLANNING. Would the project:

a. Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Conflict with applicable land use plan, policy or	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

XII. NOISE. Would the project result in:

a. Exposure of persons to or generation of noise in level in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Exposure of people to or generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

XIII. PEDESTRIAN SAFETY. Would the project:

a. Substantially increase vehicular and/or pedestrian safety hazards due to a design feature or incompatible uses?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Create unsafe routes to schools for students walking from local neighborhoods?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Be located on a site that is adjacent to or near a major	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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arterial roadway or freeway that may pose a safety hazard?

XIV. POPULATION AND HOUSING. Would the project:

- | | | | | |
|--|--------------------------|--------------------------|-------------------------------------|-------------------------------------|
| a. Induce substantial population growth in an area either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b. Displace substantial numbers of existing housing necessitating the construction of replacement housing elsewhere? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| c. Displace substantial numbers of people necessitating the construction of replacement housing elsewhere? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
-

XV. PUBLIC SERVICES. 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:

- | | | | | |
|-----------------------------|--------------------------|--------------------------|-------------------------------------|-------------------------------------|
| a. Fire protection? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b. Police protection? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| c. Schools? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| d. Parks? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| e. Other public facilities? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
-

XVI. RECREATION.

- | | | | | |
|--|--------------------------|--------------------------|-------------------------------------|-------------------------------------|
| a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 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? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
-

XVII. TRANSPORTATION/CIRCULATION. 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 | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|--|--------------------------|--------------------------|-------------------------------------|--------------------------|

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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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? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 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? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| d. Substantially increase hazards to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| e. Result in inadequate emergency access? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| 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? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

XVIII. TRIBAL CULTURAL RESOURCES IMPACTS. Will the project be:

- | | | | | |
|---|--------------------------|--------------------------|-------------------------------------|-------------------------------------|
| a. 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)? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 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 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? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

XVIII. UTILITIES. Would the project:

- | | | | | |
|--|--------------------------|--------------------------|-------------------------------------|-------------------------------------|
| a. Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 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? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| c. Require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, the construction of which could cause significant | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
environmental effects?				
d. Have sufficient water supplies available to serve the project from existing entitlements and resource, or are new or expanded entitlements needed?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f. Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g. Comply with federal, state, and local statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

XX. MANDATORY FINDINGS OF SIGNIFICANCE.

a. Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Does the project have impacts which are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of an individual 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).	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Does the project have environmental effects which cause substantial adverse effects on human beings, either directly or indirectly?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>



3.0 PROJECT DESCRIPTION

3.1 Overview

As part of the District's School Upgrade Program,⁹ the District plans to implement a comprehensive modernization project at Venice High School in Los Angeles, California. A campus-wide survey of the Venice High School campus found the existing structures, mechanical systems, and athletic facilities to be outdated, requiring rehabilitation or modernization to meet current needs.¹⁰ Many of the issues to be addressed by the project arise from the fact that the school is more than a century old. The campus was built between 1913 and 1914, and was rebuilt following the 1933 Long Beach earthquake.¹¹ Most of the current buildings were built between 1933 and 1959, although alterations and additions continued through 1980. Many of the campus buildings typify the Public Works Administration (PWA) Moderne style of architecture, which is also a primary period of historical significance for Venice High School.¹²

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 facilities; upgrades to infrastructure and utilities; and various site-wide upgrades per the Americans with Disabilities Act (ADA; 42 U.S. Code Chapter 126).

3.2 Project Location

Venice High School is on a 28.8-acre site located at 13000 Venice Boulevard in the City of Los Angeles, California. The campus is bound on the northwest by Venice Boulevard, on the northeast by residential properties which face Lyceum Avenue, on the southeast by Zanja Street, and on the northwest by Walgrove Avenue. **Figures 3.2-1**, Project Vicinity and **3.2-2**, Project Location depict the site in its regional and local contexts, respectively. Regional access to the campus is provided by Venice Boulevard, which intersects Interstate 405 approximately 1.5 miles to the northeast, while local access is provided by a series of residential collectors, including Lyceum Avenue to the east, Zanja Street to the south, and Walgrove Avenue to the west.

3.3 Campus Setting

The campus contains 53 buildings consisting of 32 permanent buildings and 21 portables, providing a combined 104 classrooms with capacity to accommodate 2,400 students. **Figure 3.3-1**, Campus Layout shows a site plan of the existing facilities, while the existing buildings and structures on the campus are listed in **Table 3.3-1**, Existing Buildings and Structures.

⁹ LAUSD OEHS, "School Upgrade Program Final Environmental Impact Report," <http://achieve.lausd.net/ceqa>, Adopted by the Board of Education on November 10, 2015.

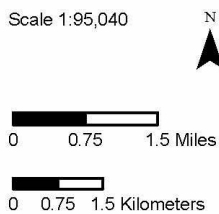
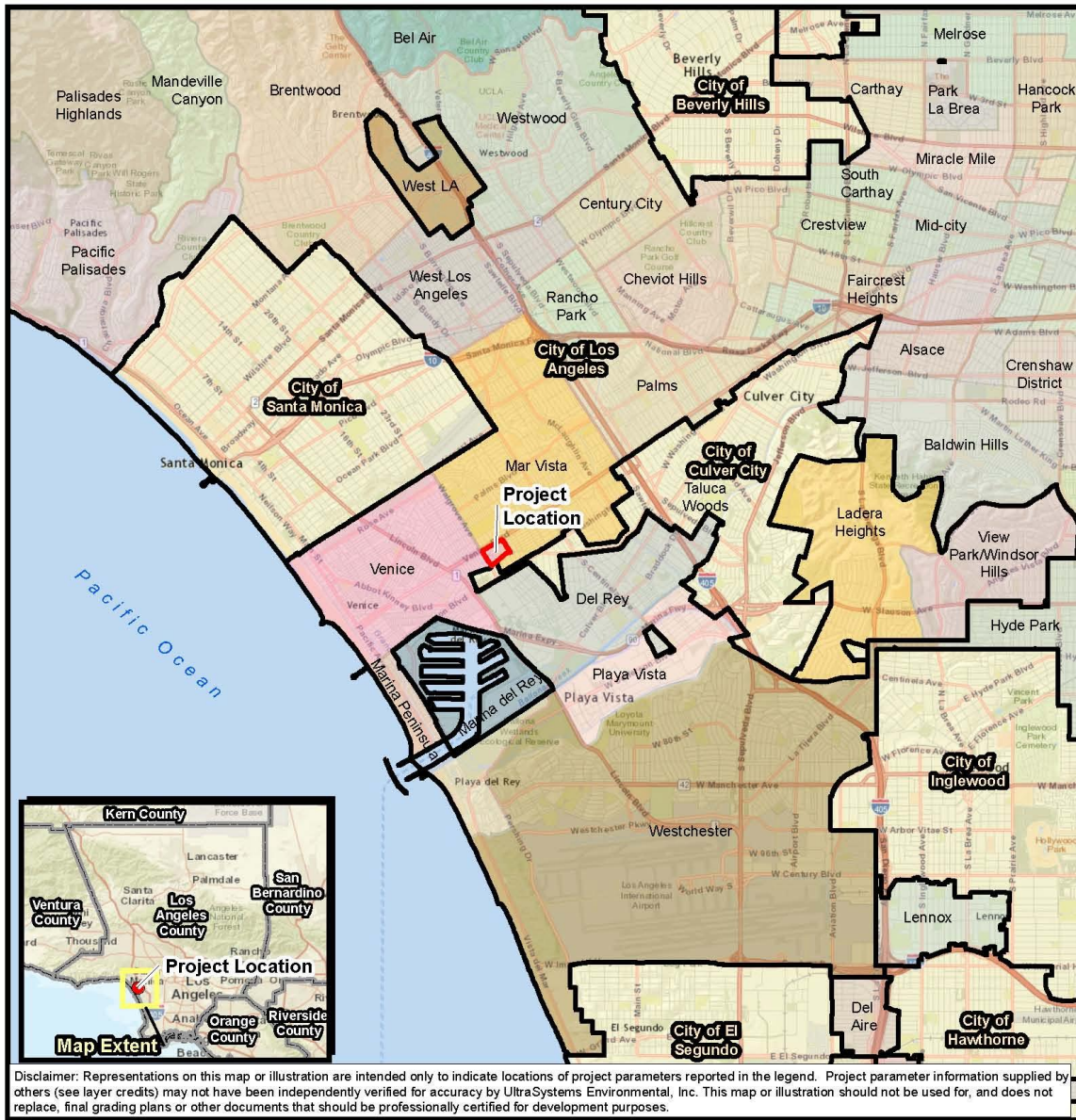
¹⁰ LAUSD, Venice High School: Campus Pre-Planning Survey, 2016

¹¹ LAUSD, July 28, 2015. Character-Defining Features Memorandum (CDFM) for Venice High School, 13000 Venice Boulevard, Los Angeles, California, 90064. Los Angeles, CA.

¹² LAUSD. March 15, 2002. Historic Context Statement, 1870 to 1969. Los Angeles, CA.



**Figure 3.2-1
PROJECT VICINITY**



**Venice High School
Comprehensive
Modernization Project**
Project Vicinity





**Figure 3.2-2
PROJECT LOCATION**



Path: J:\Projects\6011_LAUSD_Venice\MXD\General\6011_Venice_20_Venice_Location_2016_08_24.mxd
 Service Layer Credits: Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AEX, Getmapping, Aerogrid, IGN, IGP, swisstopo, and the GIS User Community, Esri, HERE, DeLorme, MapmyIndia, © OpenStreetMap contributors, Esri, HERE, DeLorme, MapmyIndia, © OpenStreetMap contributors, and the GIS user community. Content may not reflect National Geographic's current map policy. Sources: National Geographic, Esri, DeLorme, HERE, UNEP-WCMC, USGS, NASA, ESA, METI, NRCAN, GEBCO, NOAA, increment P Corp.; LA County Assessor, 2015-2016; UltraSystems Environmental, Inc., 2016

August 24, 2016

**Venice High School
Comprehensive
Modernization Project**

Project Location

Scale 1:7,200



0 300 600 Feet

0 100 200 Meters

Legend

Venice High School Parcel Boundary



**Figure 3.3-1
CAMPUS LAYOUT**



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

Source: LAUSD. June 16, 2011



Venice High School
Comprehensive Modernization Project
Campus Layout



**Table 3.3-1
EXISTING BUILDINGS AND STRUCTURES**

Building #1	Building Name	Year Built	Building Type	Type/Description	Square Feet ²
47	M-425	1922	Portable	Storage	314
19	Ticket Booth	1931	Permanent	Permanent	75
16	Storage #1	1932	Permanent	Permanent	1636
13	Administration Building	1935	Permanent	Permanent	23,791
22	Shop Building #2	1935	Permanent	Permanent	8,500
24	Shop Building #3	1935	Permanent	Permanent	12,810
15	West Building	1935	Permanent	Permanent	28,179
-	Bridge #1	1935	Permanent	Permanent	3,544
5	East Building	1937	Permanent	Permanent	32,706
2	Assembly Hall (Auditorium)	1937	Permanent	Permanent	16,934
4	Craft Building	1937	Permanent	Permanent	2,618
-	Bridge #2	1937	Permanent	Permanent	1,518
18	Cafeteria Building	1940	Permanent	Permanent	12,302
35	LASPD West Div. Locker/Gym Building C	1944	Permanent	Permanent	2,591
21	Competitive Gymnasium Building	1951	Permanent	Permanent	34,740
25	Lath House	1951	Permanent	Permanent	1,965
11	Flammable Storage	1953	Permanent	Permanent	58
6	Practice Gymnasium Building	1955	Permanent	Permanent	21,761
7	Electric Control House	1955	Permanent	Permanent	74
20	Sanitary #1	1956	Permanent	Permanent	1,111
8	South Bleacher	1956	Permanent	Permanent	4,584
26	Greenhouse	1956	Permanent	Permanent	633
10	North Bleachers, Section #2	1956	Permanent	Permanent	3,271
9	North Bleachers, Section #1	1956	Permanent	Permanent	3,257
49	AA-1786	1957	Portable	Bungalow	1,760
48	AA-1785	1957	Portable	Bungalow	1,746
50	AA-1787	1957	Portable	Bungalow	2,359
34	AA-1957	1958	Portable	Bungalow	1,817
51	AA-1986	1959	Portable	Bungalow	1,807
14	Building A	1960	Permanent	Permanent	27,887
3	Music Building	1961	Permanent	Permanent	3,821
27	Utility Building	1962	Permanent	Permanent	2,565
17	Student Store	1962	Permanent	Permanent	1,709
33	AA-2507	1964	Portable	Bungalow	1,789



❖ PROJECT DESCRIPTION ❖

Building # ¹	Building Name	Year Built	Building Type	Type/Description	Square Feet ²
52	AA-2494	1965	Portable	Bungalow	3,161
23	Shop Building #1	1967	Permanent	Permanent	8,932
30	East Bleachers	1969	Permanent	Permanent	986
29	Building B	1969	Permanent	Permanent	23,333
35	LASPD West Div. - AA-2676	1971	Portable	Bungalow	2,699
31	Storage Unit	1973	Permanent	Permanent	366
12	Utility Building (Heating Plant)	1975	Permanent	Permanent	3,311
32	Storage Unit	1979	Permanent	Permanent	359
38	AA-3700	1998	Portable	Classroom	1,919
42	DSA Building	2001	Portable	Classroom	954
36	DSA Building	2001	Portable	Classroom	952
37	DSA Building	2001	Portable	Classroom	952
40	DSA Building	2001	Portable	Classroom	954
41	DSA Building	2001	Portable	Classroom	954
43	DSA Building	2001	Portable	Classroom	954
46	DOH Classroom Building	2001	Portable	DOH	954
39	Sanitary Building	2002	Portable	Sanitary	495
28	New Two-Story Classroom Building	2003	Permanent	Permanent	8,626
17	Lunch Shelter	N/A	Permanent	Lunch Shelter	8,572
-	Arcade #3	N/A	Permanent	Arcade	N/A
-	Arcade #1	N/A	Permanent	Arcade	N/A
-	Arcade #4	N/A	Permanent	Arcade	N/A
-	Arcade #5	N/A	Permanent	Arcade	N/A
-	Mechanical Enclosure	N/A	Permanent	Enclosure	N/A
-	Patio	N/A	Permanent	Enclosure	N/A
10	Announcer's Booth	N/A	Permanent	Permanent	200
Permanent buildings/structures to be removed					102,400
Portable buildings to be removed					20,200

Source: LAUSD, 2016.

1. Building numbers are correlated to Figure 3.3-1, Campus Layout.
2. Building sqft are approximates.

The project site is comprised of permanent buildings, including five primary classroom buildings, two gymnasiums, shop buildings, and one auditorium (**Figure 3.3-1**, Campus Layout). The buildings built between 1933 and 1937 typify the PWA Moderne style of architecture, which was popular during the Great Depression and World War II. They include the Administration Building, West Classroom Building, Shop Buildings 1 and 3, the Assembly Hall, Craft Building, and East Classroom Building. Character defining features include concrete exteriors, flat roofs, symmetrical composition, juxtaposition of vertical and concrete lines, concave and convex elements, fluted and reeded surfaces, sculptural embellishments, stylized chevrons and dentils, steel and wood-framed



sash, and covered outdoor walkways. LAUSD assigned the campus a California Historic Resources status code of 3S, noting that the campus appears individually eligible for the National Register of Historic Places as a result of a survey evaluation.

The remainder of the project site contains portable buildings and is developed with sports fields, a running track, tennis courts, and parking lots. The campus is linked by a system of exterior corridors, walkways, arcades and bridges (**Figure 3.3-1**, Campus Layout).

The campus has three species of California native trees, one California Bay tree (*Umbellularia californica*), one coast live oak (*Quercus agrifolia*) and three California sycamores (*Platanus racemosa*), that were observed within the project site during the field survey and are documented in the tree inventory (Severynen, 2016).

3.4 Description of proposed project

3.4.1 Purpose and Objectives

The purpose of the Venice High School Comprehensive Modernization Project is to provide facilities that are safe, secure, and aligned with the instructional program of Venice High School. The project is designed to address the most critical physical concerns of the buildings and grounds at the campus while providing renovations, modernizations, and reconfigurations that are consistent with the project definition for Venice High School.¹³

3.4.2 Planned Improvements

The major project components include (1) demolition of various buildings and structures, (2) construction of new buildings and structures, (3) upgrades to facilities throughout the campus, and (4) improvements to comply with federal, state and local facilities requirements. **Table 3.4-1**, Summary of Project Improvements summarizes the planned improvements to the campus. Each activity is described in greater detail following the table.

Table 3.4-1
SUMMARY OF PROJECT IMPROVEMENTS

Physical Asset	Activity	Number of Buildings	Floor Space (Square Feet)
Competitive Gymnasium Building	Demolition	1	34,740
Practice Gymnasium Building	Demolition	1	21,761
Utility Building (Heating Plant)	Demolition	1	3,311
Industrial Arts Classroom Buildings (Shop Buildings)	Demolition	3	8,932 8,500 12,810
Classrooms in Relocatable Buildings ¹⁴	Demolition	13	20,200

13 LAUSD, Board of Education. Board of Education Report. Report No. 246-15/16. February 9, 2016.

14 Also referred to as portables or portable buildings.



Physical Asset	Activity	Number of Buildings	Floor Space (Square Feet)
Stadium Bleachers	Demolition	N/A	12,098
Classroom Building (General and Specialty) and Support Spaces	New construction	1	40,718
Shops Building	New construction	1	15,969
Gymnasium	New construction	1	45,195
Site-wide Infrastructure	<ul style="list-style-type: none"> • Upgrade sanitary sewer, water, and electrical utilities; • Create storm drain system • Remove identified and prioritized barriers to program accessibility • Upgrade landscaping and hardscaping • Athletics/PE upgrades (including baseball, fields, bleachers, and backstop, etc.) 	N/A	N/A
Various	<ul style="list-style-type: none"> • Paint building exteriors • Install new flooring • Upgrades for regulatory compliance 	N/A	N/A
TOTAL (Structure Construction)		Up to 122,600 square feet demolished Up to 101,882 square feet Constructed	

3.4.2.1 Demolition

The project would include demolition of:

- Competitive Gymnasium Building,
- Practice Gymnasium Building,
- Three Industrial Arts Classroom Buildings (Shop Buildings),
- Utility Building (school-site Utility Building),
- Approximately 14 classrooms located in relocatable buildings.

3.4.2.2 New Construction and Renovations

The following structures would be built to current federal, state and local code requirements and LAUSD design standards:

- 30 classrooms (general and specialty) and support spaces (within a new Classroom Building and new Shops Building),
- Gymnasium (practice and competitive facilities),
- New bleachers and resurfacing of the grass field and track in the football stadium,
- New bleachers and a backstop for the baseball field,



- Various site-wide upgrades to remove identified and prioritized barriers to program accessibility per the Americans with Disabilities Act (ADA; 42 U.S. Code Chapter 126).

3.4.2.3 Infrastructure Upgrades

The project would also include the following site upgrades:

- Upgrades to site-wide infrastructure, including sanitary sewer, water, and electrical utilities,
- New stormwater facilities, which do not currently exist at the school.

3.4.2.4 Updates for Regulatory Compliance

The project includes various actions to ensure that Venice High School complies with various federal, state and local statutory and regulatory requirements. These include improvements required by the ADA, California Department of General Services, Division of the State Architect, Office of the Independent Monitor, the **SCs**, and the Program Environmental Impact Report (PEIR).¹⁵

3.4.3 Access, Circulation, and Parking

The project would move an existing open parking lot from the southwestern portion of the campus off Venice Boulevard (near the intersection of Walgrove Avenue and Venice Boulevard) to the northern portion of the campus off Venice Boulevard. This space is currently a softball field. Vehicular access and parking would be designed to comply with Section 2.3, Vehicular Access and Parking of the School Design Guide 2016.¹⁶ The School Design Guide contains general parking guidelines as well as guidelines relating to vehicular access and pedestrian safety, and security. Off-site improvements would include construction activities on the sidewalks located immediately adjacent to the campus for the repair, creation, extension, or modification of driveways, a possible curb extension, and existing sidewalks.

3.4.4 Landscaping

The 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 coastal 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 being placed on the campus.

3.4.5 Site Security and Safety

Following the project, the campus would remain an "open campus" with the majority of the campus not being fenced or gated. However, the proposed project may include the addition of fences surrounding new parking lots. Additionally, security lighting would be installed throughout the campus for safety.

15 LAUSD OEHS, "School Upgrade Program Final Environmental Impact Report," <http://achieve.lausd.net/ceqa>. Adopted by the Board of Education on November 10, 2015.

16 <http://www.laschools.org/new-site/asset-management/school-design-guide>



3.4.6 Seismic Safety

The project site is located within the seismically active Southern California region and is likely to experience strong ground shaking from seismic events generated on regionally active faults. In addition to site-specific geotechnical recommendations, the project, design and construction of new buildings will comply with seismic safety requirements of the DSA and CBC. Compliance with DSA and CBC requirements, as well as implementation of **SC-GEO-1**, would ensure that potential hazards from strong seismic ground shaking is addressed through the design of the new building, structures, and modifications.

3.4.7 Sustainability Features

The proposed project's new buildings and structures would be designed to reduce energy use below current levels by incorporating modernized and energy-efficient features, which may include lighting, windows, electrical transformers, building insulation, or installation of irrigation smart controllers, etc. All new construction would exceed by 10 percent or more the California Title 24, Part 6 energy efficiency standards and be consistent with **SC** (including but not limited to **SC-GHG-5**).

3.4.8 Construction Characteristics and Schedule

The project would be executed through a design-build contract. Preconstruction activities are underway and are expected to be completed in the third quarter of 2018. Construction activities are anticipated to begin in the fourth quarter of 2018 and be completed in the fourth quarter of 2020.

Construction would entail (1) demolition of up to approximately 122,600 square feet (approximately 102,400 square feet of existing buildings and structures and approximately 20,200 square feet of demolition of existing portables), and (2) construction of approximately 101,882 square feet of new buildings and structures.

Demolition activities would be managed and conducted by the District's Facilities Environmental Technical Unit (FETU) in accordance with the District's standard practices. FETU would be responsible for ensuring the safe removal of potential asbestos containing materials and lead that may be encountered during construction. LAUSD would ensure that all construction related activities are completed in accordance with all applicable federal, state, and local regulations, including but not limited to the EPA Guidance on Conducting Non-Time-Critical Removal Actions Under Comprehensive Environmental Response, Compensation, and Liability Act, National Oil and Hazardous Substances Pollution Contingency Plan, and all applicable LAUSD specifications, and standards. Construction would also comply with the applicable **SCs**, which include, but are not limited to, **SC-USS-1**, which requires that any construction waste will be recycled to the maximum extent feasible.¹⁷

Any activity that involves cutting, grinding, or drilling during building renovation or demolition, or that involves relocation of underground utilities, could release friable asbestos fibers unless proper precautions are taken. The federal Clean Air Act regulates asbestos as a hazardous air pollutant; the South Coast Air Quality Management District (SCAQMD) locally implements the federal regulation

¹⁷ LAUSD OEHS, "School Upgrade Program Final Environmental Impact Report," <http://achieve.lausd.net/ceqa>, Adopted by the Board of Education on November 10, 2015.



through its Rule 1403. The federal Occupational Safety and Health Administration (OSHA) also regulates asbestos as a potential worker safety hazard. The Asbestos-Containing Materials in Schools rule (Code of Federal Regulations [CFR] Title 40, Part 763, Subpart E), promulgated under the federal Asbestos Hazard Emergency Response Act (AHERA), requires local education agencies to inspect their school buildings for asbestos-containing building material, prepare asbestos management plans, and perform asbestos response actions to prevent or reduce asbestos hazards. AHERA also tasked the U.S. Environmental Protection Agency (EPA) with developing a model plan for states for accrediting persons conducting asbestos inspection and corrective-action activities at schools.

Additionally, soil removal activities would be completed in compliance with the Removal Action Workplan (RAW) that was prepared for the proposed project.¹⁸ The RAW is consistent with the criteria specified in the California Health and Safety Code (H&SC) § 25356.1(h) and includes a description of the onsite impact, a plan for conducting the removal action, and the goals to be achieved by the removal action, as required by H&SC § 25323.1 (see **Appendix F**, Site Assessment).¹⁹

LAUSD's construction contractor would prepare and comply with a Storm Water Pollution Prevention Plan (SWPPP), which includes best management practices (BMPs) for erosion and sediment control. LAUSD standard practices require that all projects require 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 (2009). The proposed project would also comply with all of the applicable federal, state, and local rules and regulations as well as with the following LAUSD Construction BMPs (which are consistent with **SC-AQ-2** and **SC-N-5 through 9**), in carrying out construction of the proposed project.

- Construction contractors shall keep properly functioning mufflers on all internal combustion and vehicle engines used in construction. To the extent feasible, the construction contractor shall store and maintain equipment, including portable equipment, as far away as possible from sensitive noise receptors. Temporary barriers capable of reducing temporary construction related noise shall be installed when construction equipment or activities are anticipated to exceed 75 dBA at 50 feet from the nearest sensitive receptor,
- Construction contractors shall provide advance notice of the start of construction to the school administration and to all noise-sensitive receptors (immediately surrounding noise-sensitive residences) adjacent to the school, including specifically where and when construction activities would occur and provide contact information for filing noise complaints.

Construction related activities would be scheduled to occur during daylight hours to the extent feasible. Construction-related traffic and deliveries would be scheduled to avoid student pick-up, drop-off hours, and during noise sensitive times as coordinated with the school administration.

¹⁸ LAUSD (Prepared by Placeworks). 2017. Removal Action Work Plan for the Venice High School Comprehensive Modernization Project. Los Angeles, CA.

¹⁹ LAUSD (Prepared by Placeworks). 2017. Removal Action Work Plan for the Venice High School Comprehensive Modernization Project. Los Angeles, CA.



Should evening work be required, **SC-BIO-2**,²⁰ which requires the use of shields or light redirecting/minimizing efforts, would be implemented to protect sensitive species from light. Consistent with the City of Los Angeles Municipal Code, all non-emergency construction activities would occur between 7:00 a.m. and 9:00 p.m., Monday through Friday and 8:00 a.m. to 6:00 p.m. on Saturdays and national holidays.²¹ Construction is prohibited on Sundays.²²

At a minimum, it is conservatively anticipated that the project construction would be completed as one overlapping phase where various activities would be staged to occur throughout various parts of the campus at the same time over an approximately 2-year period. The equipment to be used is outlined in **Table 3.4-2**, Construction Equipment Assumptions.

Table 3.4.2
CONSTRUCTION EQUIPMENT ASSUMPTIONS

Phase	Equipment Type	Pieces	HP	Load Factor	Hours/Day
Demolition	Concrete/Industrial Saws	1	81	0.73	8
	Rubber Tired Dozers	2	247	0.4	8
	Excavators	3	158	0.38	8
Site Preparation	Rubber Tired Dozers	3	247	0.4	8
	Tractors/Loaders/Backhoes	4	97	0.37	8
Grading	Excavators	2	158	0.38	8
	Graders	1	187	0.41	8
	Rubber Tired Dozers	1	247	0.4	8
	Scrapers	2	367	0.48	8
	Tractors/Loaders/Backhoes	2	97	0.37	8
Building Construction	Cranes	1	231	0.29	7
	Forklifts	3	89	0.2	8
	Generator Sets	1	84	0.74	8
	Tractors/Loaders/Backhoes	3	97	0.37	7
	Welders	1	46	0.45	8
Architectural Coating	Air Compressors	1	78	0.48	6
Onsite Paving	Pavers	2	130	0.42	8
	Paving Equipment	2	132	0.36	8
	Rollers	2	80	0.38	8
Offsite Paving	Pavers	2	130	0.42	8
	Paving Equipment	2	132	0.36	8
	Rollers	2	80	0.38	8

3.5 Reviewing Agencies

The following agencies will be provided an opportunity to review the project, and IS/ND as applicable, for compliance with applicable requirements, permits, and approvals.

²⁰ LAUSD OEHS, "School Upgrade Program Final Environmental Impact Report," <http://achieve.lausd.net/ceqa>, Adopted by the Board of Education on November 10, 2015.

²¹ City of Los Angeles Municipal Code § 41.40(b).

²² City of Los Angeles Municipal Code § 41.40(b).



**Table 3.5-1
OTHER AGENCY APPROVALS**

Agency	Permit or Approval
California Department of General Services, Division of the State Architect (DSA)	Review and approval of site plans.
County/City of Los Angeles	Demolition, grading, excavation, foundation, construction, drainage, and associated building permits.
California Department of Transportation	Transportation permit for oversized vehicles on State highways.
California Department of Toxic Substances Control (DTSC)	Approval of Phase I Environmental Site Assessment (ESA); Preliminary Environmental Assessment (PEA); and Removal Action Workplan (RAW)
Los Angeles Department of Transportation (LADOT)	Review and approval of Circulation Memo (Traffic Report)
Office of Historic Preservation	None. Review of historic building preservation and renovation plans.
South Coast Air Quality Management District (SCAQMD)	Permit to construct for large boilers or other external combustion equipment exceeding two million British Thermal Unit (BTU) heat input. ²³
State Water Resources Control Board (SWRCB)	Review of Notice of Intent (NOI) to obtain permit coverage; Issuance of General Permit for Discharges of Storm Water Associated with Construction Activity; Review of Storm Water Pollution Prevention Plan (SWPPP).

²³ LAUSD holds five permits to operate, all of which are inactive, for boilers at Venice High School.



4.0 ENVIRONMENTAL ANALYSIS

4.1 Aesthetics

4.1.1 Summary of Impacts

The PEIR evaluated the potential for implementation of SUP-related projects to impact aesthetic and visual resources. Projects implemented under the SUP are anticipated to have less than significant impacts on scenic vistas, scenic resources within designated scenic highways, existing visual character, and day or nighttime views in the LAUSD region.

The PEIR includes Standard Conditions of Approval (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**, Aesthetic and Visual Resources Standard Conditions of Approval and **SC**.

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

Applicable SCs	Description
SC-AE-1	School Design Guide. This document outlines measures for re-use rather than destruction of historical resources. Requires the consideration of architectural appearance/consistency and other aesthetic factors during the preliminary design review for a proposed school upgrade project. Architectural quality must consider compatibility with the surrounding community.
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

	<p>lighting zones (LZO-4) which allow the District to vary the stringency of lighting restrictions according to the sensitivity of the area as well as consideration for the community. The MLO also incorporates the Backlight-Uplight-Glare (BUG) rating system for luminaires, which provides more effective control of unwanted light. IDA-IESNA Model establishes standards to:</p> <ul style="list-style-type: none"> • Limit the amount of light that can be used. • Minimize glare by controlling the amount of light that tends to create glare. • Minimize sky glow by controlling the amount of uplight. • Minimize the amount of off-site impacts or light trespass.
SC-CUL-2	<p>Role of Historic Architect on Design-Build Team</p> <p>The tasks of the Historic Architect on the Design-Build team shall include (but not necessarily be limited to) the following:</p> <ol style="list-style-type: none"> 1. The Historic Architect shall work with the Design Builder and LAUSD to ensure that project components, including new construction and modernization of existing facilities, continue to comply with applicable historic preservation standards, including the <i>Secretary of the Interior's Standards for the Treatment of Historic Properties</i> and <i>LAUSD Design Guidelines and Treatment Approaches for Historic Schools</i>. The Historic Architect shall work with the Design-Builder throughout the design process to develop project options that facilitate compliance with the applicable historic preservation standards. 2. For new construction, the Historic Architect shall work with the Design-Builder and LAUSD to identify options and opportunities for (1) ensuring compatibility of scale and character for new construction, site and landscape features, and circulation corridors, and (2) ensuring that new construction is designed and sited in such a way that reinforces and strengthens, as much as feasible, character-defining site plan features, landscaping, and circulation corridors throughout campus. 3. For modernization and upgrade projects involving contributing (significant) buildings, the Historic Architect shall work with the Design-Builder and LAUSD to ensure that specifications for design and implementation of projects comply with the applicable historic preservation standards. 4. The Historic Architect shall participate in design team meetings through all phases of the project through 100 percent construction drawings, pre-construction, and construction phases. 5. The Historic Architect shall produce brief memos, at the 50 percent and 100 percent construction drawings stages, demonstrating how principal project components and treatment approaches comply with applicable historic preservation standards, including the <i>Secretary of the Interior's Standards for the Treatment of Historic Properties</i> and <i>LAUSD Design Guidelines and Treatment Approaches for Historic Schools</i>. The memos will be reviewed by LAUSD and incorporated into the Mitigation Monitoring and Report Plan (MMRP) for the project. 6. The Historic Architect shall participate in pre-construction and construction monitoring activities to ensure continuing conformance with Secretary's Standards and/or avoidance of a material impairment of the historical resources. 7. The Historic Architect shall provide specialized Construction Specifications Institute (CSI) specifications for architectural features or materials requiring restoration, removal, or on-site storage. This shall include detailed instructions on maintaining and protecting in place relevant features. 8. The Design-Builder and Historic Architect shall be responsible for incorporating

	LAUSD's recommended updates and revisions during the design development and review process.
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According to the PEIR, projects implemented under the SUP are anticipated to have less than significant impacts on aesthetics and visual resources in the LAUSD region. Similarly, the project-specific analysis provided in **Section 4.1.2** concludes that implementation of the Venice High School Comprehensive Modernization Project would also have less than significant impacts on aesthetics, visual resources and visual quality of the existing environment in the project area.

4.1.2 Impacts Associated with the proposed project

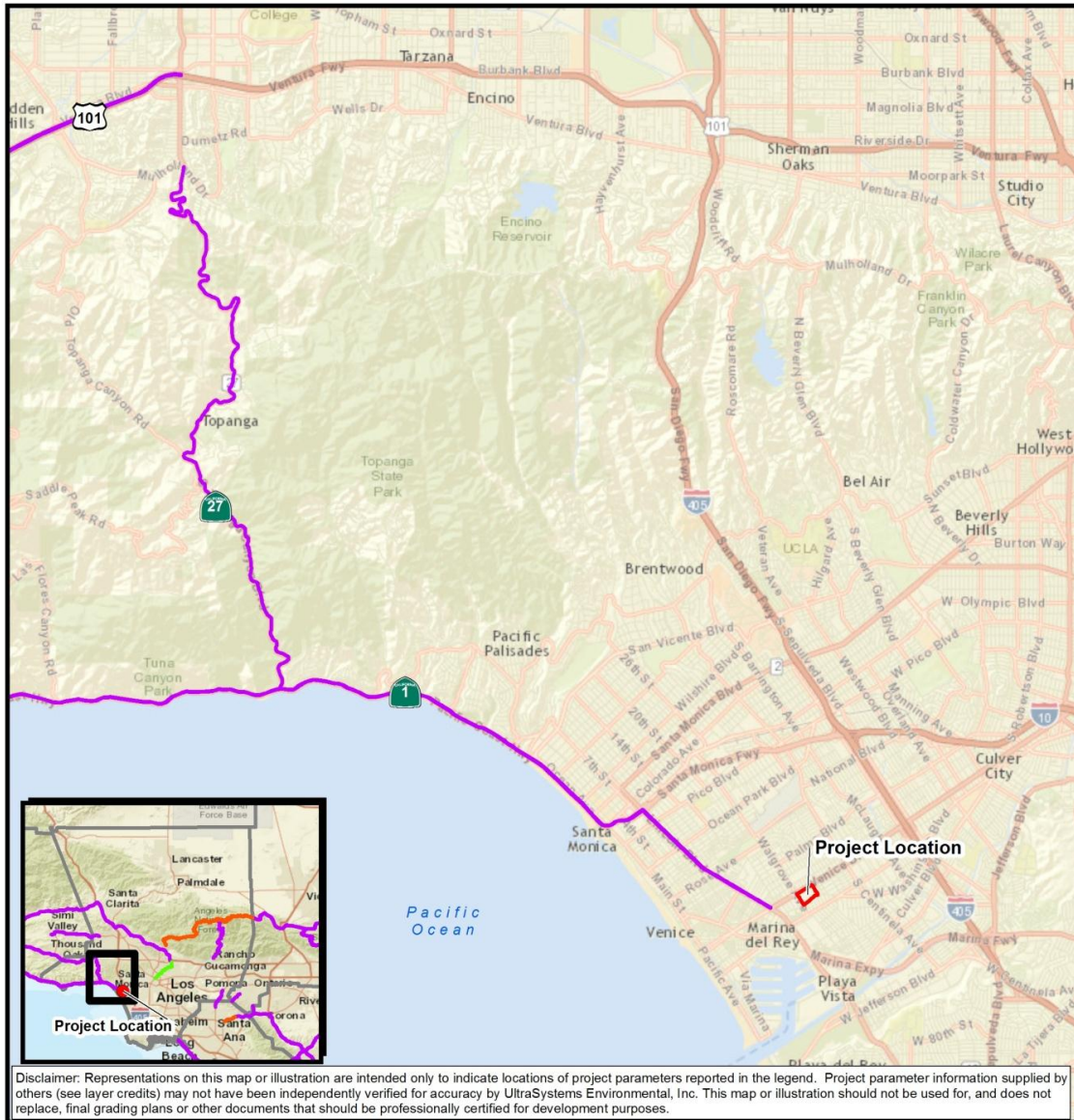
4.1.2.1 Environmental Setting

The proposed project is not located near (within 0.25 mile) an officially designated scenic highway or corridor. **Figure 4.1-1**, Scenic Highways and Byways shows officially designated and eligible national and state scenic highways located near the project site. The nearest scenic highway, State Route 1 - Pacific Coast Highway, which is an eligible scenic highway (not officially designated) is located 0.4-mile northwest of the project. The nearest officially designated state scenic byway (State Route 2 - Angeles Crest Highway) is located approximately 21 miles from the project. The nearest officially designated National Byway and Los Angeles County Highway (Arroyo Seco Historic Parkway - Route 110) is located approximately 11 miles northeast of the project.

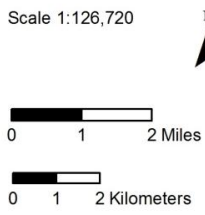
Scenic resources within the project area include Venice Beach, which is located approximately three miles west of the campus; Santa Monica Mountains National Recreational Area, located approximately two miles northwest of the campus; Topanga State Park, located approximately five miles northwest of the campus; and Marina Del Rey Boat Marina, located approximately three miles southwest of the campus. Due to the flat topography of land in the project area, the area is devoid of scenic views of the Venice Beach, Santa Monica Mountains National Recreational Area, Topanga State Park, Marina Del Rey Boat Marina or other natural visual resources from public thoroughfares and open spaces.

The overall visual character in the project area is urban in nature and is characterized by residential and commercial land uses. Existing buildings in the area are low in height, predominantly one- to four-story structures. Major arterials are flanked by low- to medium-density commercial development interspersed with multi-family apartments. In the areas between arterial streets, narrower residential streets allow for low- to medium-density neighborhoods generally composed of detached, single-family residences. Existing buildings in the area are mostly modern in architectural style with colonial architectural details and finishes in some structures. Streets and sidewalks are lined with utility poles, street lights, trees and ornamental vegetation.

**Figure 4.1-1
SCENIC HIGHWAYS AND BYWAYS**



Path: J:\Projects\6011_LAUSD_Venice\MXDs\IS_MND\6011_Venice_4.1_State_Scenic_Hwys_2017_03_07.mxd
 Service Layer Credits: Sources: Esri, HERE, DeLorme, USGS, Intermap, INCREMENT P, NRCan, Esri Japan, METI, Esri Korea, Esri (Thailand), MapmyIndia, NGCC, © OpenStreetMap contributors, and the GIS User Community; Caltrans, 2014; National Byways- U.S. DOT, 2013; UltraSystems Environmental, Inc., 2016
 March 7, 2017



**Venice High School
Comprehensive
Modernization Project**

State Scenic Highways
and National Byways



Consistent with its predominantly urban character, the project area possesses man-made aesthetic resources, including buildings and landscapes that possess a distinctive appearance, history, and/or societal or cultural importance. As discussed in **Section 4.5**, the Venice High School campus comprises buildings and structures that are considered historically significant, meeting the listing criteria for the National Register of Historic Places or the California Register of Historical Resources. The campus was rebuilt in the PWA Moderne-style²⁴ between 1934 and 1937, after the original 1913-1914 campus was damaged and subsequently demolished following the 1933 Long Beach earthquake. Significant character-defining buildings and landscapes represent the 1934-1937 period of significance, are visually prominent, and retain high integrity.

The frontage of the Venice High School campus is a group of PWA Moderne-style buildings constructed in 1935-1937. The Administration Building, Assembly Hall, East Classroom Building (originally identified as Senior Building in 1935) and West Classroom Building (originally identified as Junior Building in 1935), concentrated in the northern portion of the campus, along the southeastern side of Venice Boulevard, form a coherent and continuous front façade for the school.

In terms of architectural style and design these four buildings are considered to be primary contributors to the historical significance of Venice High School campus. These buildings are the most high-profile components of the campus, and their street-facing façades present the best examples of the PWA Moderne-style. The character-defining features of the design include “concrete exteriors, flat roofs, symmetrical composition, juxtaposition of vertical and concrete lines, concave and convex elements, fluted and reeded surfaces, sculptural embellishments, stylized chevrons and dentils, steel and wood-framed sash, and covered outdoor walkways.”²⁵

Figure 4.1-2, Existing Visual Character in the Project Area shows photographs of existing historic buildings on campus and existing visual character in the project area. Views of the character-defining prominent historic buildings described above are available from surface streets surrounding Venice High School, including but not limited to Venice Boulevard, Walgrove Avenue, Zanja Street and Lyceum Avenue.

Shop Building No. 2 and Shop Building No. 3, located in the southwestern part of the campus; and Craft Building (a.k.a. Fine Arts Building) located in the northeast part of the campus; are considered to be secondary or tertiary contributors to the historical significance of Venice High School campus. These buildings are consistent in appearance to the same basic design theme, but are less elaborate in architectural detailing, much lower in profile, and are largely concealed from the surrounding public rights-of-way by other buildings on the campus.

Refer to **Section 4.5**, Cultural Resources of this IS/ND and **Figure 4.5-1**, Locations of Proposed Development Zones and Contributing Elements to Venice High School for more detailed information regarding existing historic buildings and resources in the project area.

²⁴ PWA Moderne is an architectural style of many buildings in the United States completed between 1933 and 1944, during and shortly after the Great Depression as part of relief projects sponsored by the Public Works Administration (PWA) and the Works Progress Administration (WPA). The structures reflect a greater use of conservative and classical elements and have a monumental feel. They include post offices, train stations, public schools, libraries, civic centers, courthouses, museums, bridges, and dams across the country.

²⁵ Heumann, 2002.

Figure 4.1-2
EXISTING VISUAL CHARACTER IN THE PROJECT AREA



View of the Venice High School main access with Historic Administration Building and Myrna Loy Statue located along Venice Boulevard.



View of the Historic Administration Building and Bridge #2 located along Venice Boulevard.



View of Building A and Bridge #1 (forefront) along Venice Boulevard, facing south. The Administration Building and West Building are visible in the background.



View of the Auditorium (Assembly Hall) main entrance (exterior) along Venice.



View of Practice Gymnasium Building and tennis courts with facades facing Lyceum Avenue.



View of surrounding area at the Walgrove Avenue and Zanja Street intersection, facing east.

a) Have a substantial adverse effect on a scenic vista?**Less Than Significant Impact**

Public views which incorporate the project site are available from surface streets surrounding Venice High School, including Venice Boulevard, Walgrove Avenue, Zanja Street and Lyceum Avenue. In general, views from these streets are of the built environment adjacent to the roadways. Due to the flat topography, scenic views of natural visual resources (i.e., the Venice Beach, Santa Monica Mountains National Recreational Area, Topanga State Park or Marina Del Rey Boat Marina) are not available from public thoroughfares and open spaces in the project area.

While no scenic vistas are visible from the campus, the Venice High School campus was assigned California Historical Resource Status Codes of “3S” and “3CS,” which means the subject school appears eligible for the National Register and the California Register through survey evaluation. Therefore, the campus as a whole meets CEQA’s definition of an “historical resource.” The significant (primary) and contributing (secondary and tertiary) character-defining buildings and landscapes of Venice High School date from the period of significance that account for its eligibility as a historical resource. The primary period of significance for Venice High School is between 1934 and 1937, when the campus was rebuilt in the PWA Moderne-style. Significant character-defining buildings and landscapes represent the 1934-1937 period of significance, are visually prominent, and retain high integrity. While contributing character-defining buildings and landscapes retain moderate integrity or may fall outside of the primary period of significance; each significant or contributing building/landscape features contribute to the visual character and architectural significance of the building/landscape from its period of significance.

Under the proposed project, new and updated buildings would be compatible with the general character, massing, and color of existing buildings (including the historic 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.

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.

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

While the project is not located within a State-designated scenic highway, the Pacific Coast Highway (State Route 1) is considered eligible for designation. The Pacific Coast Highway is located approximately 0.4 mile from Venice High School, stretching along the coastline, west of the project site. Scenic resources within the scenic highway corridor would not be significantly impacted by the project, as project construction and operation would not impede views of scenic resources as observed from the Pacific Coast Highway. There would be no change in views from either direction of the Pacific Coast Highway, as the project site would not be visible to drivers due to the distance. Therefore, the project would not have the potential to result in viewshed obstruction and impacts

on scenic resources. Furthermore, implementation of standard condition **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, project impacts would be less than significant.

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

Less than Significant Impact

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 existing mid-century modern architectural style of existing historic 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 in the 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 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 Venice 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. Implementation of **SC-AE-1** requires LAUSD to consider architectural appearance/consistency and compatibility with buildings on campus and the surrounding community, during the design of new buildings and other upgrades proposed as part of the project. **SC-CUL-2** for historic resources, encourages reuse rather than destruction of historical resources, with multiple goals of: retaining and preserving the historic character of a building, structure, or site; treating distinctive architectural features or examples of skilled craftsmanship with sensitivity and; concealing reinforcement required for structural stability or life, or safety, or mechanical systems. **SC-AE-2** requires LAUSD to install measures such as 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 seating areas, nurseries, and existing solar collectors.²⁶

²⁶ 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.

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 residential uses surrounding the project site on three of the campus' four boundaries. Following project construction, impacts associated with shade and shadows would be virtually the same as existing conditions, since the new and updated building 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-1**, **SC-AE-2**, **SC-AE-3**, and **SC-CUL-2** project impacts on visual character or quality of the site and its surroundings would be less than significant.

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 the community of Venice, in an urban area that is characterized by medium nighttime ambient light levels. Artificial lighting is currently utilized on campus and in the surrounding area for security, parking, signage, architectural highlighting, and landscaping/decorative purposes. Street lights and traffic on local streets also contribute to the ambient light levels in the area. Light sensitive uses in the project vicinity are limited to surrounding residences.

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

The project would comply with the requirements of California Building Code (CBC) that 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; include lighting 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, and 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.



4.2 Agriculture and Forestry Resources

4.2.1 Summary of Impacts

The PEIR evaluated the potential for implementation of SUP-related site-specific projects to impact agriculture and forestry resources. LAUSD is urbanized with small areas of scattered important farmland, no land protected under Williamson Act contract, and no forest land or timberland. Therefore, projects implemented under the SUP would have less than significant or no impacts on agricultural and forestry resources.

As no potential impacts on agriculture and forestry resources were identified, the PEIR does not include **SCs** for minimizing impacts on those resources.

According to the PEIR, projects implemented under the SUP are anticipated to have less than significant impacts related to the conversion of farmland to nonagricultural use and no impacts on land protected under a Williamson Act Contract, forest land and timberland uses in the LAUSD region. Similarly, project specific-analysis provided in **Section 4.2.2**, concludes that implementation of the Venice High School Comprehensive Modernization Project would have no impacts on agriculture and forestry resources in the project area.

4.2.2 Impacts Associated with the Proposed Project

4.2.2.1 Environmental Setting

The Venice High School campus is located within a developed urban area that is not mapped as Prime or Unique Farmland or Farmland of Statewide Importance on the California Important Farmland Finder (CIFF) maintained by the Farmland Mapping and Monitoring Program (FMMP).²⁷ No Williamson Act Contracts affect land within or near the Venice High School campus.²⁸ No forest land or timberland is located within or near the school campus.²⁹

4.2.2.2 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

There are no areas of Prime Farmland, Unique Farmland or Farmland of Statewide Importance on or near the Venice High 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

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

28 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.

29 City of Los Angeles. Zone Information and Map Access System (ZIMAS). <http://zimas.lacity.org/>.

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



site or in the surrounding area.³¹ Therefore, the project site is not located on designated Prime Farmland, Unique Farmland, or Farmland of Statewide Importance as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program. The project would not convert farmland to non-agricultural uses. No impact would occur.

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 Venice High School campus. There are no Williamson Act Contracts that affect land in the LAUSD or land within or near Venice High School.³³ Therefore, the project would not conflict with existing zoning for agricultural use or a Williamson Act contract. No impact would occur.

c) Would the project (c) 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 Public Facilities (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.

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.

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?

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). <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/>



No Impact

There are no agricultural uses or related operations on or near the project site.³⁵ Therefore, the project would not involve the conversion of farmland to other uses, either directly or indirectly. No impacts to agricultural uses would occur.

35 City of Los Angeles. Zone Information and Map Access System (ZIMAS). <http://zimas.lacity.org/>



4.3 Air Quality

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 PEIR 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. According to the PEIR, some impacts, even with implementation of regulatory requirements and **SCs** would potentially be significant.

The PEIR 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**, Air Quality Standard Conditions of Approval and in **SCs**. 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-1	<p>OEHS CEQA Specification Manual, Appendix J, Air Toxics Health Risk Assessment (HRA).</p> <p>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</p>
SC-AQ-2	<p>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.</p>
SC-AQ-3	<p>LAUSD’s construction contractor shall:</p> <ul style="list-style-type: none"> • Maintain slow speeds with all vehicles. • Load impacted soil directly into transportation trucks to minimize soil handling. • Water/mist soil as it is being excavated and loaded onto the transportation trucks. • Water/mist and/or apply surfactants to soil placed in transportation trucks prior to exiting the site. • 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.



Applicable SCs	Description
SC-AQ-4	<p>LAUSD shall prepare an air quality assessment:</p> <p>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.</p> <p>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:</p> <p><u>Exhaust Emissions</u></p> <ul style="list-style-type: none"> • Schedule construction activities that affect traffic flow to off-peak hours (e.g. between 10:00 AM and 3:00 PM). • Consolidate truck deliveries and/or limit the number of haul trips per day. • Route construction trucks off congested streets. • Employ high pressure fuel injection systems or engine timing retardation. • Utilize ultra-low sulfur diesel fuel, containing 15 ppm sulfur or less (ULSD) in all diesel construction equipment. • Use construction equipment rated by the United States Environmental Protection Agency as having Tier 3 (model year 2006 or newer) or Tier 4 (model year 2008 or newer) emission limits for engines between 50 and 750 horsepower. • Restrict non-essential diesel engine idle time, to not more than five consecutive minutes. • Utilize electrical power rather than internal combustion engine power generators as soon as feasible during construction. • Utilize electric or alternatively fueled equipment, if feasible. • Utilize construction equipment with the minimum practical engine size. • Utilize low-emission on-road construction fleet vehicles. • Ensure construction equipment is properly serviced and maintained to the manufacturer’s standards.



Applicable SCs	Description
	<p data-bbox="407 331 561 359"><u>Fugitive Dust</u></p> <ul data-bbox="456 367 1390 1472" style="list-style-type: none"><li data-bbox="456 367 1390 464">• Apply non-toxic soil stabilizers according to manufacturers' specification to all inactive construction areas (previously graded areas inactive for ten days or more).<li data-bbox="456 472 1390 499">• Replace ground cover in disturbed areas as quickly as possible.<li data-bbox="456 508 1390 604">• 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).<li data-bbox="456 613 1390 709">• 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.<li data-bbox="456 718 1390 814">• 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.<li data-bbox="456 823 1390 877">• Pave all construction access roads for at least 100 feet from the main road to the project site.<li data-bbox="456 886 1390 940">• Water the disturbed areas of the active construction site at least three times per day, except during periods of rainfall.<li data-bbox="456 949 1390 1052">• 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.<li data-bbox="456 1060 1390 1115">• Suspend all excavating and grading operations when wind speeds (as instantaneous gusts) exceed 25 miles per hour (mph).<li data-bbox="456 1123 1390 1178">• Apply water at least three times daily, except during periods of rainfall, to all unpaved road surfaces.<li data-bbox="456 1186 1390 1220">• Limit traffic speeds on unpaved road to 15 mph or less.<li data-bbox="456 1228 1390 1325">• Prohibit high emission causing fugitive dust activities on days where violations of the ambient air quality standard have been forecast by SCAQMD.<li data-bbox="456 1333 1390 1388">• Tarp and/or maintain a minimum of 24 inches of freeboard on trucks hauling dirt, sand, soil, or other loose materials.<li data-bbox="456 1396 1390 1451">• Limit the amount of daily soil and/or demolition debris loaded and hauled per day. <p data-bbox="407 1480 651 1507"><u>General Construction</u></p> <ul data-bbox="456 1516 1390 1675" style="list-style-type: none"><li data-bbox="456 1516 1390 1543">• Utilize ultra-low VOC or zero-VOC surface coatings.<li data-bbox="456 1551 1390 1579">• Phase construction activities to minimize maximum daily emissions.<li data-bbox="456 1587 1390 1614">• Configure construction parking to minimize traffic interference.<li data-bbox="456 1623 1390 1675">• Provide temporary traffic control during construction activities to improve traffic flow (e.g., flag person).



Applicable SCs	Description
	<ul style="list-style-type: none">• Develop a trip reduction plan for construction employees.• Implement a shuttle service to and from retail services and food establishments during lunch hours.• Increase distance between emission sources to reduce near-field emission impacts.• Require construction contractors to document compliance with the identified mitigation measures.
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.

According to the PEIR, projects implemented under the SUP are anticipated to have less than significant and potentially significant impacts on air quality in the LAUSD region. However, the project specific analysis provided in **Section 4.3.2.2** concludes that implementation of the Venice High School Project would have less than significant impacts on the surrounding community and the school site.

4.3.2 Impacts Associated with the proposed project

4.3.2.1 Environmental Setting

Ambient Air Quality

The proposed project site is located just inside SCAQMD’s Northwest Coastal Los Angeles County source-receptor area (SRA 2). The most representative air quality monitoring station for the site is the Los Angeles Westchester Parkway LAX Station, which is located at 7201 West Westchester Parkway, Los Angeles, California 90045. This station is 2.98 miles southwest of the project site. The Los Angeles Westchester Parkway LAX Station monitors carbon monoxide (CO), respirable particulate matter (PM₁₀), nitrogen dioxide (NO₂) and ozone (O₃). The nearest station that records fine particulate matter (PM_{2.5}) is the Los Angeles North Main Street Station at 1630 North Main Street, Los Angeles, CA 90012, which is 13.28 miles northwest of the project site. No station within a reasonable distance measures SO₂. The ambient air quality data in the proposed project vicinity as recorded at these two stations for 2013 to 2015 and the applicable federal and state standards are shown in **Table 4.3-2**, Ambient Air Quality Monitoring Data.



**Table 4.3-2
AMBIENT AIR QUALITY MONITORING DATA**

Air Pollutant	Standard/Exceedance	Year		
		2013	2014	2015
Carbon Monoxide (CO)	Year Coverage	90.4%	100%	ND ^a
	Max. 1-hour Concentration (ppm)	ND	2	ND
	Max. 8-hour Concentration (ppm)	1.3	1.3	ND
	# Days > Federal 1-hour standard of 35 ppm	ND	ND	ND
	# Days > Federal 8-hour standard of 9 ppm	ND	ND	ND
	# Days > California 8-hour standard of 9.0 ppm	ND	ND	ND
Ozone (O ₃)	Year Coverage	90%	96%	92%
	Max. 1-hour Concentration (ppm)	0.105	0.114	0.096
	Max. 8-hour Concentration (ppm)	0.081	0.080	0.077
	# Days > Federal 8-hour Standard of 0.075 ppm	1	3	1
	# Days > California 1-hour Standard of 0.09 ppm	1	1	1
	# Days > California 8-hour Standard of 0.07 ppm	1	6	3
Nitrogen Dioxide (NO ₂)	Year Coverage	98%	95%	97%
	Max. 1-hour Concentration (ppb)	ND	ND	ND
	Annual Average (ppb)	ND	12	11
	# Days > California 1-hour Standard 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 Standard of 0.04 ppm	ND	ND	ND
Respirable Particulate Matter (PM ₁₀)	Year Coverage	85%	100%	99%
	Max. 24-hour Concentration (µg/m ³)	38	46	42
	#Days > Fed. 24-hour Standard of 150 µg/m ³	0	0	0
	#Days > California 24-hour Standard of 50 µg/m ³	ND	0	ND
	Annual Average (µg/m ³)	20.8	22.1	21.2
Fine Particulate Matter (PM _{2.5})	Year Coverage	95%	83%	94%
	Max. 24-hour Concentration (µg/m ³)	43.1	59.9	56.4
	State Annual Average (µg/m ³)	18.9	ND	12.5
	#Days > Fed. 24-hour Standard of 35 µg/m ³	1.1	ND	8.4
	Federal Annual Average (µg/m ³)	12	ND	12.3
Sources: http://www.arb.ca.gov/adam/select8/sc8start.php . Accessed October 7, 2016. https://www.arb.ca.gov/adam/trends/trends1.php . Accessed October 7, 2016. https://www.arb.ca.gov/adam/topfour/topfourdisplay.php . Accessed October 7, 2016. http://www.aqmd.gov/home/library/air-quality-data-studies/historical-data-by-year . Accessed October 7, 2016.				
^a ND - There were insufficient (or no) data available to determine the value.				

Attainment of Ambient Air Quality Standards

Table 4.3-3 (Federal and State Attainment Status) shows the area designation status of the SCAB for each criteria pollutant for both the NAAQS and CAAQS. Based on regional monitoring data, the SCAB is currently designated as a non-attainment area for O₃; a federal maintenance area for CO and NO₂; and an attainment area for PM₁₀, PM_{2.5}, and SO₂.^{36,37} Designation of the SCAB as a

36 According to the SCAQMD, the “Basin has met the PM10 standards at all stations and a request for re-designation to attainment is pending with U.S. EPA.” (SCAQMD Board Meeting, December 7, 2012, Agenda Item 30, p. 6.)

37 On July 8, USEPA made a finding that the South Coast has attained the 1997 24-hour and annual PM2.5 standards based on 2011-2013 data. <https://www.regulations.gov/document?D=EPA-R09-OAR-2014-0708-0081>. This determination became effective August 24, 2016.



maintenance area means that, although the Basin has achieved compliance with the NAAQS for CO and NO₂, control strategies that were used to achieve compliance must continue. The Federal ozone classification is “extreme.”³⁸ An extreme non-attainment area has an 8-hour ozone design value of 0.187 ppm,³⁹ and has the attainment deadline of June 15, 2024. On June 26, 2013, the U.S. Environmental Protection Agency (USEPA) approved, as a revision to the California State Implementation Plan (SIP), the state's request to redesignate the South Coast Air Basin to attainment for the 24-hour PM₁₀ NAAQS. The USEPA is also approving the PM₁₀ maintenance plan and the associated PM₁₀ motor vehicle emissions budgets for use in transportation conformity determinations necessary for the South Coast PM₁₀ area. Finally, the USEPA approved the attainment year emissions inventory. The USEPA took these actions because the SIP revision meets the requirements of the Clean Air Act (CAA) and USEPA guidance for such plans and motor vehicle emissions budgets.⁴⁰

**Table 4.3-3
FEDERAL AND STATE ATTAINMENT STATUS**

Pollutants	Federal Classification	State Classification
Ozone (O ₃)	Non-Attainment (Extreme)	Non-Attainment
Particulate Matter (PM ₁₀)	Attainment	Non-Attainment
Fine Particulate Matter (PM _{2.5})	Attainment	Non-Attainment
Carbon Monoxide (CO)	Maintenance	Attainment
Nitrogen Dioxide (NO ₂)	Maintenance	Non-Attainment
Sulfur Dioxide (SO ₂)	Attainment	Attainment

Sources:

U.S. Environmental Protection Agency, “California 8-Hour Ozone Nonattainment Areas in Blue Borders.” Green Book. [www.epa.gov/air/oaqps/greenbook/ca8.html]. Updated December 14, 2012;

U.S. Environmental Protection Agency, “Counties Designated Nonattainment for PM-10.” Green Book. [http://www.epa.gov/air/oaqps/greenbook/map/mappm10.pdf]. Accessed January 2017;

California Air Resources Board, “Area Designations Maps/State and National.” [www.arb.ca.gov/desig/adm/adm.htm]. Accessed January 2017.

^aThe California Air Resources Board is proposing to reclassify the SCAB to attainment for the state NO₂ ambient air quality standard. http://www.arb.ca.gov/desig/desig13/2013_workshop_presentation_text.pdf.

Sensitive Receptors

Some people, such as individuals with respiratory illnesses or impaired lung function because of other illnesses, persons over 65 years of age, and children under 14, are particularly sensitive to certain pollutants. 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.

38 U.S. Environmental Protection Agency. 2011. “8-Hour Ozone Nonattainment State/Area/County Report.” Green Book. http://www.epa.gov/air/oaqps/greenbook/gncs.html#CALIFORNIA. Updated December 14, 2012.

39 U.S. Environmental Protection Agency. 2011. “Designations.” Green Book. www.epa.gov/air/oaqps/greenbook/define.html. Updated August 30, 2011.

40 “Approval and Promulgation of Implementation Plans; Designation of Areas for Air Quality Planning Purposes; California; South Coast Air Basin; Approval of PM10 Maintenance Plan and Redesignation to Attainment for the PM10 Standard.” Federal Register 78 (123): 38223-38226. http://www.gpo.gov/fdsys/pkg/FR-2013-06-26/html/2013-15145.htm.



Sensitive receptors for the proposed project include the students on campus as they may be onsite during certain portions of the construction activities. Offsite sensitive receptors representing the various land uses located within 0.25 mile of the proposed project site (measured from the campus boundary) are shown in **Figure 4.3-1**, Offsite Sensitive Receptors and listed in **Table 4.3-4**, Nearest Offsite Sensitive Receptors.⁴¹ The sensitive receptors nearest the campus boundary are single-family residences on Lyceum Avenue whose back yards abut the athletic facilities on the northeast. These receptors were not used in the impact analysis because with the exception of the creation of a parking lot, relatively little construction activity would occur near them (in comparison to other receptors where construction activities may entail demolition, construction of new buildings, etc.). The principal existing sensitive receptors nearest the project site are residential neighborhoods immediately on the northeast, southeast and southwest sides of the school, and across Venice Boulevard to the northwest. Mark Twain Middle School is about 850 feet to the north-northwest.

4.3.2.2 Impact Analysis

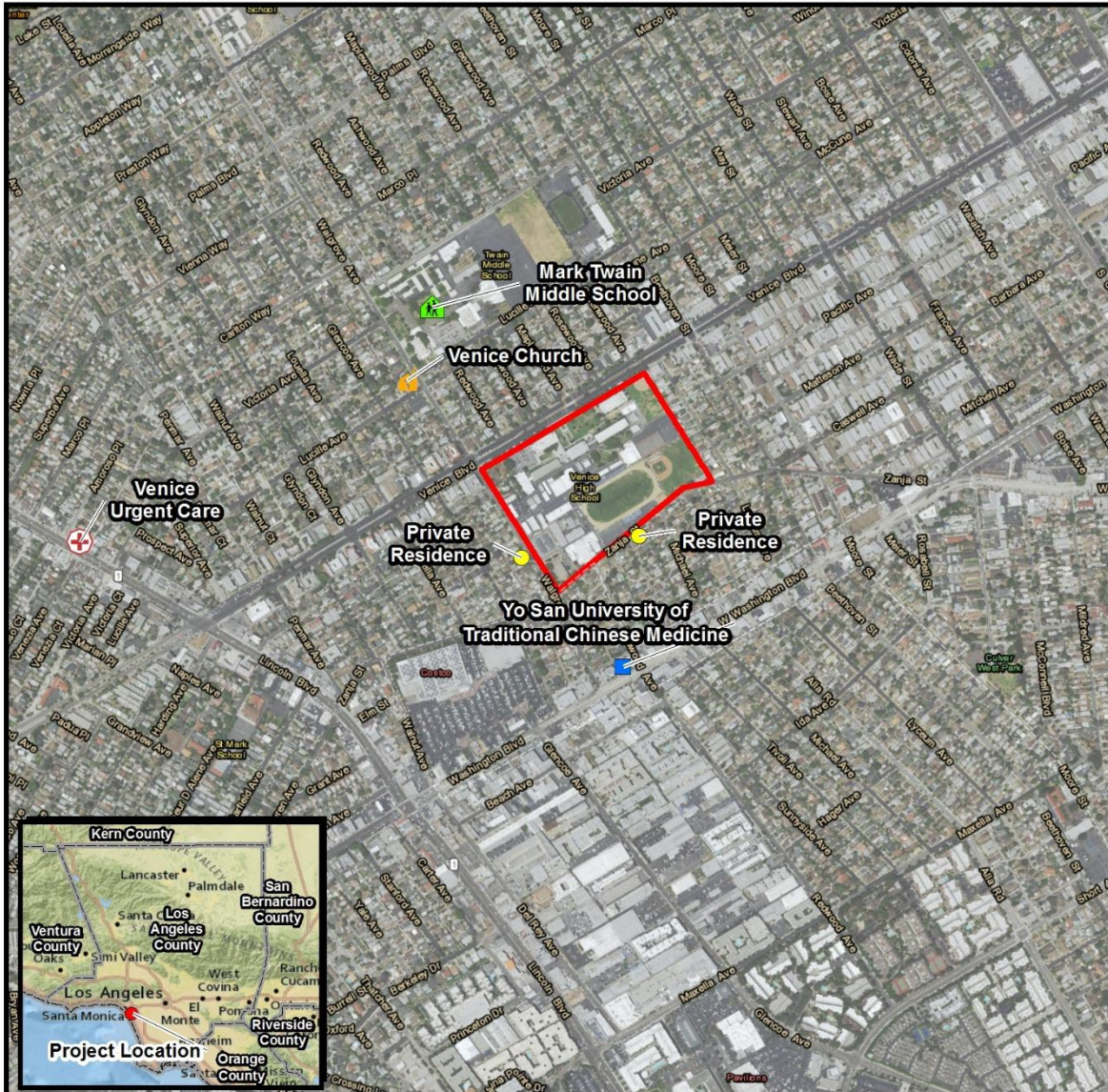
a) Would the project conflict with or obstruct implementation of the applicable air quality plan?

Less than Significant Impact

Neither the Venice High School Comprehensive Modernization Project nor 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 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.

41 The nearest medical facility (Venice Urgent Care) located at: 2006 Lincoln Blvd. Los Angeles, CA, 3,726 feet west of the campus, is also shown in Figure 4.3-1, Offsite Sensitive Receptors.

**Figure 4.3-1
OFFSITE SENSITIVE RECEPTORS**



Disclaimer: Representations on this map or illustration are intended only to indicate locations of project parameters reported in the legend. Project parameter information supplied by others (see layer credits) may not have been independently verified for accuracy by UltraSystems Environmental, Inc. This map or illustration should not be used for, and does not replace, final grading plans or other documents that should be professionally certified for development purposes.

Path: J:\Projects\6011_LAUSD_Venice\MXD\GIS_MND\6011_Venice_4.3_Sensitive_Receptors_2017_01_31.mxd
 Service Layer Credits: Esri, HERE, DeLorme, MapmyIndia, © OpenStreetMap contributors, Esri, HERE, DeLorme, MapmyIndia, © OpenStreetMap contributors, and the GIS user community. Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community. Content may not reflect National Geographic's current map policy. Sources: National Geographic, Esri, DeLorme, HERE, UNEP-WCMC, USGS, NASA, ESA, METI, NRCAN, GEBCO, NOAA, increment P Corp., LA County Assessor, 2015-2016; LA County DPW, 2013; UltraSystems Environmental, Inc., 2016

January 31, 2017

Scale 1:12,000

Legend	
	Venice High School Parcel Boundary
	Mark Twain Middle School
	Private Residence
	Venice Church
	Venice Urgent Care
	Yo San University of Traditional Chinese Medicine

**Venice High School
Comprehensive
Modernization Project**
 Sensitive Receptors





**Table 4.3-4
NEAREST OFFSITE SENSITIVE RECEPTORS**

	Sensitive Receiver Name	Location	Distance from Proposed Project^a (Feet)
1	Private Residence ⁴²	3904 Tivoli Avenue Los Angeles, CA 90066 Latitude: 33.995816 Longitude: -118.442412	<100
2	Private Residence ⁴³	2469 Walgrove Avenue Los Angeles, CA 90066 Latitude: 33.99539 Longitude: -118.445187	<100
3	Yo San University of Traditional Chinese Medicine	13315 W. Washington Blvd. Los Angeles, CA 90066 Latitude: 33.993244 Longitude: -118.442772	787
4	Venice Church	2241 Walgrove Avenue Los Angeles, CA 90066 Latitude: 33.998879 Longitude: -118.447876	870
5	Mark Twain Middle School	2224 Walgrove Avenue Los Angeles, CA 90066 Latitude: 34.000295 Longitude: -118.447325	850

^aDistances measured from border of the campus.

**Table 4.3-5
MAXIMUM DAILY UNMITIGATED REGIONAL CONSTRUCTION EMISSIONS**

Construction Activity	Maximum Emissions (lbs/day)				
	ROG	NO_x	CO	PM₁₀	PM_{2.5}
Maximum Emissions (With Rule 403)	47.2	85.3	56.4	13.6	8.5
<i>SCAQMD Significance Thresholds</i>	<i>75</i>	<i>100</i>	<i>550</i>	<i>150</i>	<i>55</i>
Significant (Yes or No)	No	No	No	No	No

Source: Calculated by UltraSystems with CalEEMod (Version 2016.3.1).

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

42 Inclusive of all residences within the immediate vicinity of this property.

43 Inclusive of all residences within the immediate vicinity of this property.



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 (California Air Pollution Control Officers Association, 2016). All modeling output files and additional assumptions are provided in **Appendix A**.

For the purpose of this analysis, it was estimated that the construction of the proposed project would begin in early January 2018 and finish mid-January 2020. 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 inputted 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. **Table 4.3-5**, Maximum Daily Unmitigated Regional Construction Emissions shows the model's estimates of maximum daily emissions of the criteria pollutants.

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.

- 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 project would replace or upgrade facilities on the campus of Venice High School, but it would not increase the number of students or faculty at Venice 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.

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

Less than Significant Impact

As previously noted, 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. 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. Students on campus were evaluated as sensitive receptors due to their proximity to the proposed construction activities. As seen in **Table 4.3-4**, the nearest offsite sensitive receptors are single-family residences on the northern, southern and western sides of the school.

Following SCAQMD guidance (SCAQMD, 2003), only onsite construction emissions of NO_x , CO, PM_{10} , and $\text{PM}_{2.5}$ were considered in the localized significance analysis. It was estimated that the part of the campus most likely to have significant construction activity would be near the southwest corner, and that the highest onsite emissions of all pollutants except $\text{PM}_{2.5}$ would occur during a combination of grading and new building construction. For $\text{PM}_{2.5}$, the activity with the largest onsite emissions would be the combination of site preparation and new building construction. It was assumed that, as a worst case, the maximum daily disturbance would be a 2.85-acre area containing two adjacent subareas: in one area, new building construction would take place, while on the other, all the construction phases before construction of another building would take place.

Two offsite receptors (residences on Tivoli Avenue and Walgrove Avenue, near the southwest corner of the campus) were analyzed. For the analysis of impacts on Venice 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.

Localized significance thresholds were obtained by interpolation from tables in Appendix C of the SCAQMD's *Final Localized Significance Threshold Methodology*.⁴⁴ **Table 4.3-6**, Results of Localized Significance Analysis 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.

44 Chico, T. and Koizumi, J. Op. Cit.



**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 Tivoli	287	87	82.9	52.7	12.8	8.2
SCAQMD LST for 2.85 acres ^a			172	1,850	36	9.8
Significant (Yes or No)			No	No	No	No
Residence on Walgrove	276	84	82.9	52.7	12.8	8.2
SCAQMD LST for 2.85 acres ^a			172	1,816	35	9.4
Significant (Yes or No)			No	No	No	No
Students on Campus	387	118	82.9	52.7	12.8	8.2
SCAQMD LST for 2.85 acres ^b			181	2,243	45.3	13.3
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.

^a Thresholds interpolated linearly between 50 meters and 100 meters and between 2 acres and 5 acres. Thresholds are for source-receptor area 2 (Northwest Coastal LA County).

^b Thresholds interpolated linearly between 100 meters and 200 meters and between 2 acres and 5 acres. Thresholds are for source-receptor area 2 (Northwest Coastal LA County).

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

Less than Significant Impact

The PEIR found that schools are not one of the types of land uses typically associated with malodorous emissions (wastewater treatment plants, fiberglass manufacturing facilities, etc.). Furthermore, while landscaping equipment, such as lawnmowers and leaf blowers, generates exhaust fumes, the odors would temporary. In any event, whatever odors are associated with campus operations would not change because of the project. Short-term construction-related odors will cease once construction of the project is complete. Therefore, odor impacts associated with the Venice High School Comprehensive Modernization Project would be less than significant.

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 Marina Freeway (State Route 90, which is 1.7 miles southeast of the campus. In addition, the campus fronts Venice Boulevard, a major roadway. The student and faculty population at Venice 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.



4.4 Biological Resources

4.4.1 Summary of Impacts

The PEIR 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**, **SC-BIO-4**, as well as **MM-BIO-1**, the impacts associated with nesting birds, wildlife movement, and impacts to native trees would be less than significant.

The PEIR includes LAUSD Standard Conditions of Approval (SCs) for minimizing impacts on biological resources in areas where future projects would be implemented under the SUP. Applicable SCs related to biological resources impacts associated with the project are provided in **Table 4.4-1**, Biological Resources Standard Conditions of Approval and in **Section 7.0**.

**Table 4.4-1
BIOLOGICAL RESOURCES STANDARD CONDITIONS OF APPROVAL**

Applicable SCs	Description
<p>SC-BIO-2 SC-BIO-3</p>	<p>Light Impacts to Sensitive Species</p> <p>-LAUSD shall protect sensitive species from harmful exposure to light by shielding light sources, redirecting light sources, or using low intensity lighting.</p> <p>Bird and Bat Nesting Sites</p> <p>LAUSD shall comply with the following:</p> <p>-Project activities (including, but not limited to, staging and disturbances to native and nonnative vegetation, structures, and substrates¹) should occur outside of avian breeding season to avoid take of birds or their eggs.² Depending on the avian species present, a qualified biologist may determine that a change in the breeding season dates is warranted.</p> <p>-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.</p>



Applicable SCs	Description
	<p>-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.</p> <p>-No construction shall occur within the fenced next zone until the young have fledged, are no longer being fed by the parents, have left the nest, and will no longer be impacted by the construction.</p> <p>-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.</p>
SC-BIO-4	<p>Removal of any Native Mature Oak Trees or Woodland Habitat</p> <p>LAUSD shall comply with the following:</p> <p>-Mitigation shall not include translocation of rare plants. CDFW, in most cases does not recommend translocation, salvage, and/or transplantation of rare, threatened, or endangered plant species, in particular oak trees, as compensation for adverse effects because successful implementation of translocation is rare. Even if translocation is initially successful, it will typically fail to persist over time.</p> <p>-Permanent conservation of habitat. To ensure the conservation of sensitive plant species, the preferred method is permanent conservation of habitat containing these species; any translocation proposed shall only be an experimental component of a larger, more robust plan.</p> <p>-Off-site acquisition of woodland habitat. Due to the inherent difficulty in creating functional woodland habitat with associated understory components, the preferred method is off-site acquisition of woodland habitat in the local area. All acquired habitat shall be protected under a conservation easement and deeded to a local land conservancy for management and protection.</p> <p>-Creation of oak woodlands. Any creation of functioning woodlands shall be of similar composition, structure, and function of the affected oak woodland. The new woodland shall mimic the function, demonstrate recruitment, plant density, and percent basal canopy, and vegetation cover, as well as other measurable success criteria before the measure is deemed a success.</p> <p>- All seed and shrub sources used for tree and understory species in the new planting site shall be collected or grown from on-site sources or from adjacent areas and shall not be purchased from a supplier. This method should reduce the risk of introducing diseases and pathogens into areas where they might not currently exist.</p> <ul style="list-style-type: none"> - Oaks should be replaced by planting acorns because this has been shown to result in greater oak survival. Monitoring efforts, including the exclusion of herbivores, shall be employed to maximize seedling survival during the monitoring period. - Monitoring period for oak woodland shall be at least 10 years with a minimum of seven years without supplemental irrigation. This allows the trees to go through one typical drought cycle. This should also be the minimal time needed to see signs of stress and disease and determine the need for replacement plantings. <p>-LAUSD shall request CDFW review and comment on any translocation plans, habitat preservation, habitat creation and/or restoration plans.</p>

According to the PEIR, projects implemented under the SUP are anticipated to have less than significant impacts with mitigation on biological resources in the LAUSD region. The project-



specific analysis provided in **Section 4.4.2** concludes that implementation of the Project would also have less than significant impacts on biological resources.

4.4.2 Impacts Associated with the Proposed Project

4.4.2.1 Methodology

Relevant literature, maps, databases, agency web sites, Geographic Information System (GIS) data, and aerial imagery were obtained from public domain sources to: (1) assess habitats, special-status plant and wildlife species, jurisdictional waters, critical habitats, and wildlife corridors that potentially may occur in and near the project site, and (2) identify local or regional plans, policies, and regulations that may apply to the proposed project. Plant and wildlife species protected by federal agencies, state agencies, and nonprofit resource organizations, such as the California Native Plant Society (CNPS), are collectively referred to as “special-status species” in this section.⁴⁵ Some of these plant and wildlife species are afforded special legal or management protection because they are limited in population size, and typically have a limited geographic range and/or habitat. The following data sources were accessed:

- United States Geological Survey (USGS) 7.5-Minute Topographic Map Venice Quadrangle and current aerial imagery.⁴⁶
- California Natural Diversity Database (CNDDDB) provided by the California Department of Fish and Wildlife (CDFW).⁴⁷
- Information, Planning and Conservation (IPaC) provided by the United States Fish and Wildlife Service (USFWS).⁴⁸
- Inventory of Rare and Endangered Plants of California, 8th Edition, provided by the CNPS.⁴⁹
- National Wetlands Inventory (NWI) provided by the USFWS.⁵⁰
- National Hydrography Dataset (NHD) provided by the USGS.⁵¹
- Critical Habitat Portal provided by the USFWS⁵²

Following the literature and data review, a reconnaissance-level field survey was conducted on October 19, 2016 in and near the project site to: (1) assess the potential for sensitive habitats and presence of special-status plant and wildlife species; (2) identify plant communities and potential wildlife corridors; and (3) identify potential impacts to these biological resources, if present. The

45 Avian species protected by the Migratory Bird Treaty Act (MBTA) are not considered “special-status species.”

46 Google Earth©. Accessed on October 19, 2016.

47 CDFW CNDDDB: <https://map.dfg.ca.gov/rarefind/view/RareFind.aspx>. Accessed on September 22, 2016 and March 10, 2017.

48 USFWS IPaC: <http://ecos.fws.gov/ipac/>. Accessed on September 22, 2016.

49 CNPS Topo Quad Search: <http://cnps.site.aplus.net/cgi-bin/inv/inventory.cgi/BrowseAZ?name=quad>. Accessed November 21, 2016.

50 USFWS NWI: <http://www.fws.gov/wetlands/Data/mapper.html>. Accessed on November 23, 2016.

51 USGS NHD: <http://nhd.usgs.gov/>. Accessed on November 23, 2016.

52 USFWS Critical Habitat Portal: <http://ecos.fws.gov/crithab/>. Accessed on October 18, 2016.



CNDDDB query, the IPaC query, and the CNPS Inventory of Rare Plants query can be found in **Appendix B**.

4.4.2.2 Environmental Setting

The project site is located in a developed urban environment. The site is surrounded by residential and commercial land uses. The proposed project is located in the Santa Monica Bay Watershed. The Santa Monica Bay Watershed spans 673 square miles, ranging from the west end of the Santa Monica Mountains in Ventura County to parts of the western Los Angeles Basin and south to the coastal side of the Palos Verdes Peninsula. Many streams in the Santa Monica Mountains, Palos Verdes Hills, and Los Angeles Basin provide drainage in the watershed. Ballona Creek is the major drainage route for much of the part of the watershed in the Los Angeles Basin.

Land Cover Types

Two land cover types were determined to be present within the project site, as determined by the literature review, site visit (“field survey”) and augmented by examining aerial imagery:

- Landscaped/ornamental vegetation.
- Developed lands.

These land cover types are not considered sensitive plant communities. Landscaped/ornamental vegetation is a human-influenced assemblage of plant species associated with the high school buildings, roads, sidewalks, parking lots, and adjacent residences. It consists of non-native horticulture trees, shrubs, garden flowers and plants planted for landscaping and aesthetic purposes. A tree survey that was prepared for the proposed project noted that trees on the campus include: palm trees (*Syagrus* sp.), pines (*Pinus* sp.), carrotwood (*Cupaniopsis anacardioides*), jacaranda (*Jacaranda mimosifolia*), and southern magnolia trees (*Magnolia grandiflora*).⁵³ This community is predominately non-native, but it also contains some native species, such as California sycamore (*Platanus racemosa*), fern pine (*Afrocarpus falcatus*), and coast live oak (*Quercus agrifolia*).⁹ The vegetation on the campus could potentially provide roosting, foraging, and nesting habitat for wildlife species.

Developed lands are non-vegetated features that describe areas occupied by man-made structures, paving and other impermeable surfaces that cannot support vegetation. Developed lands on the campus consist of buildings, paved streets, paved access roads, parking lots, driveways, sidewalks, and other permanent structures. These developed areas provide virtually no habitat for wildlife species; however, birds and bats could use the buildings and structures for nesting. Developed lands and the associated ornamental vegetation are not considered a sensitive plant community. The campus does not contain any sensitive plant communities or habitat for sensitive wildlife populations.

Regulatory Context

Site-specific national, state, regional and local laws, regulations, plans, and guidelines are listed below. Therefore, this section provides a general list of the most important plans and policies that apply to SUP-related projects. Applicable LAUSD SCs are also listed.

53 2016. P.L. Severynen and L. Midura, 2016. Tree Survey and Protection Report – Venice High School Campus: Pieter L. Severynen and Luke Midura, Los Angeles, CA.



Federal

- United States Code, Title 16, § 1531 et seq.: Endangered Species Act
- United States Code, Title 33, § 1251 et seq.: Clean Water Act
- Migratory Bird Treaty Act

State

- California Fish and Game Code, § 2080: Endangered Species Act
- California Fish and Game Code § 3503: Raptor protection
- California Fish and Game Code, § 1600: Lake and Streambed Alteration Program
- California Public Resources Code, Sections 30000 et seq.: California Coastal Act

LAUSD Standard Conditions of Approval

- Project Design Features: SC- BIO-1 through SC-BIO-5

Special-Status Plants

No listed or sensitive plant species were observed within the project site during the field survey. In addition, the literature review and field survey determined that the project site lacks suitable habitats, soils, and/or other factors to support any of the listed or sensitive species in the plant inventory, as referenced in **Section 4.4.2.1 (Appendix B)**.

Special-Status Wildlife

No listed or sensitive wildlife species were observed within the project site during the field survey. In addition, the literature review and field survey concluded that the project site lacks suitable and adequate biological and physical features that are needed to support any of the listed or sensitive species in the wildlife inventory, as referenced in **Section 4.4.2.1 (Appendix B)**.

Protected Trees

In Ordinance 177404 the City of Los Angeles 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*), as referenced in **Section 4.4.2.1**. Three species of native trees, one California bay tree (*Umbellularia californica*), one coast live oak (*Quercus agrifolia*) and three California sycamores (*Platanus racemosa*), were observed within the project site during the field survey and are documented in the tree inventory (Severynen, 2016).

Jurisdictional Areas

The literature review, aerial imagery review, and jurisdictional assessment during the site visit determined that the project site does not contain jurisdictional drainages, wetlands, riparian vegetation, or evidence of an ordinary high water mark (OHWM); therefore, no United States Army Corps of Engineers (USACE), Regional Water Quality Control Board (RWQCB), or CDFW jurisdictional areas are located on-site.



Critical Habitats

The literature review determined that the project site is not located within a designated or proposed critical habitat for listed plant or wildlife species.

Wildlife Corridors

The literature review and field survey determined that the project site does not function as a major wildlife movement corridor, although migratory or resident birds may use the site for occasional foraging, roosting, or nesting. The project site does not contain high value wildlife travel routes, such as a riparian strip, ridgeline, or drainage; or wildlife crossings, such as a tunnel, culvert, or underpass. The project site does not represent a wildlife movement corridor because the site is completely developed and is surrounded by other development, walls, fencing, and roadways. These permanent structures serve as significant barriers to wildlife movement through the project site and region. Common wildlife species such as coyotes (*Canis latrans*), northern raccoons (*Procyon lotor*), striped skunks (*Mephitis mephitis*), and Virginia opossums (*Didelphis virginiana*) could be expected to travel within the project site and surrounding areas.

Nursery Sites

The project site does not support resident or migratory fish species and no native wildlife nursery sites or rookeries were observed within the project site during the field survey.

4.4.2.3 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?**

Less Than Significant Impact

The project site is an existing school campus, and no known candidate, sensitive, or special-status species are known to occur at Venice High School. Where any species do occur, LAUSD requires all SUP-related projects to comply with applicable U.S. Fish and Wildlife Service (USFWS), California Department of Fish and Wildlife (CDFW) and/or the Army Corps of Engineering provisions.

The project is not anticipated to have direct or indirect impacts on listed or sensitive plants or wildlife. In regard to the significance criterion, the project is anticipated to have no 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 CDFW or USFWS.

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 California 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.

Approximately 67 trees of varying age would be removed as a part of the project.⁵⁴

As required by LAUSD, the project would incorporate **SC-BIO-2** and **SC-BIO-3**, which requires shielding of light pollution, an intensive nest search, and delaying of the removal of trees containing active nests. Implementation of **SC-BIO-2** and **SC-BIO-3** would help to avoid, eliminate or reduce direct impacts on breeding birds to less than significant levels.

With implementation of **SC-BIO-2** and **SC-BIO-3**, impacts related to the interference with wildlife movement or nesting would be less than significant.

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 project site, as referenced in **Section 4.4.2** above. Therefore, the project is not anticipated to have direct or indirect impacts on riparian habitats or other sensitive natural communities.

The campus contains an instructional and ornamental garden, which would not be impacted as a part of the project. The garden is subject to frequent disturbances; as such, it does not provide substantial habitat value. Therefore, there would be no impact in this regard.

In regard to the significance criterion, the project is anticipated to have no substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by CDFW or USFWS.

No impact is anticipated.

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 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 CWA. With respect to new construction on existing campuses, such projects would not occur on jurisdictional waters or wetlands. Furthermore, the District is required to comply with USFWS, CDFW, and/or Army Corps permitting, as well as LAUSD Standards.

54 LAUSD. 2016. Tree Survey and Arborist Report for Venice High School. Los Angeles, CA.



In regard to the significance criterion, the project is anticipated to have no substantial adverse effect on federally protected wetlands through direct removal, filling, hydrological interruption, or other means.

No impact is anticipated.

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

Due to the nature of the project and its location within 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, Venice High School is developed and in a suburban/urbanized setting next to urban land uses. Campuses are not available for overland wildlife movement or migration, and no existing District schools are in a designated habitat linkage (Placeworks, 2015).

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 may have direct or indirect impacts on native wildlife movement due to potential impacts to migratory bird breeding sites and resident wildlife species as a result of the removal of trees.

In regard to the significance criterion, with implementation of the SCs below, 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.

- Consistent with **SC-BIO-3**, nests would not be removed or disturbed unless the nest is determined to be inactive by a qualified biologist and only be removed as part of the demolition of a building or tree removal. A nest will not be removed without an associated direct impact, in accordance with the California Fish & Game Code 3503 and 3503.5.^{55,56}
- Adherence to waste management procedures would reduce the attractiveness of the project site to potential pests or opportunistic predators such as the common ravens (*Corvus corax*), northern raccoons, Virginia opossums, and coyotes. All contractors, subcontractors, and employees would adhere to **SC-USS-1**, AB 341, and all applicable general sanitation/trash removal procedures for construction waste.

55 It is unlawful to take, possess, or needlessly destroy the nest or eggs of any bird, except as otherwise provided by this code or any regulation made pursuant thereto. <http://codes.findlaw.com/ca/fish-and-game-code/fgc-sect-3503.html#sthash.3T3pWbyg.dpuf>.

56 It is unlawful to take, possess, or destroy any birds in the orders Falconiformes or Strigiformes (birds-of-prey) or to take, possess, or destroy the nest or eggs of any such bird except as otherwise provided by this code or any regulation adopted pursuant thereto. - See more at: <http://codes.findlaw.com/ca/fish-and-game-code/fgc-sect-3503-5.html#sthash.qdFJC86o.dpuf>.



- Contractors, subcontractors, employees, and site visitors would be prohibited from feeding or collecting wildlife.
- All steep-walled pitfalls (trenches, holes, bores, and other excavations) greater than two feet deep used during the project would be completely covered at all times except when being actively used, to prevent wildlife entrapment (i.e., reptiles and small mammals).

With implementation of **SC-BIO-2**, **SC-BIO-3**, and **SC-USS-1**, impacts related to the interference with wildlife movement or nesting would be less than significant.

No further evaluation is required.

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

Less than Significant

Five trees, comprised of three native tree species, including one California bay tree (*Umbellularia californica*), one coast live oak (*Quercus agrifolia*) and three California sycamores (*Platanus racemosa*), were observed within the project site during the field survey and are documented in the tree inventory.

There is a conflict between the current footprint of proposed Building A and tree #28, a 36-inch diameter at breast height (DBH) California sycamore (*Platanus racemosa*). It may become necessary to severely prune or remove the two smaller and structurally compromised California sycamores adjacent to the Assembly Hall (trees #124 and #125) to accommodate the proposed handicapped ramp. LAUSD shall implement **SC-BIO-3** and **SC-BIO-4**, as applicable. In accordance with the City of Los Angeles' Protected Tree Ordinance, LAUSD will complete the City's tree removal permit process, as appropriate.

With implementation of **SC-BIO-3** and **SC-BIO-4**, impacts conflicting with local policies and ordinances, including tree protection ordinances, would be less than significant.

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, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. 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.



4.5 Cultural Resources

4.5.1 Summary of Impacts

The PEIR evaluated the potential for implementation of the SUP-related site-specific projects to impact cultural resources. Upon implementation of regulatory requirements and **SC**, the impacts associated with historical, cultural and paleontological resources would be less than significant.

The PEIR 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 are listed in **Table 4.5-1**, Cultural Resources **SC** and provided in detail in the **SC**.

Table 4.5-1
Cultural Resources Standard Conditions of Approval

Applicable SCs	Description
SC-CUL-1	<p>Design Build Team to Include Qualified Historic Architect</p> <p>For campuses with qualifying historical resources under CEQA, the Design-Build team shall include a qualified Historic Architect. The Historic Architect shall provide input to ensure ongoing compliance, as project plans progress, with the Secretary of the Interior’s Standards and LAUSD requirements and guidelines for the treatment of historical resources (specific requirements follow in SC-CUL-2).</p> <p>For projects involving structural upgrades to historic resources, the Design-Build team shall include a qualified Structural Engineer with a minimum of eight (8) years of demonstrated project-level experience in Historic Preservation.</p> <p>The Historic Architect/s shall meet the Secretary of the Interior’s Professional Qualifications Standards and the standards described on page 8 of the LAUSD Design Guidelines and Treatment Approaches for Historic Schools. The Historic Architect shall provide input throughout the design and construction process to ensure ongoing compliance with the above-mentioned standards.</p>
SC-CUL-2	<p>Role of Historic Architect on Design-Build Team</p> <p>The tasks of the Historic Architect on the Design-Build team shall include (but not necessarily be limited to) the following:</p> <ol style="list-style-type: none"> 1. The Historic Architect shall work with the Design Builder and LAUSD to ensure that project components, including new construction and modernization of existing facilities, continue to comply with applicable historic preservation standards, including the Secretary of the Interior’s Standards for the Treatment of Historic Properties and LAUSD Design Guidelines and Treatment Approaches for Historic Schools. The Historic Architect shall work with the Design-Builder throughout the design process to develop project options that facilitate compliance with the applicable historic preservation standards. 2. For new construction, the Historic Architect shall work with the Design-Builder and LAUSD to identify options and opportunities for (1) ensuring compatibility of scale and character for new construction, site and landscape features, and circulation corridors, and (2) ensuring that new construction is designed and sited in such a way that reinforces and strengthens, as much as feasible, character-defining site plan features, landscaping, and circulation corridors throughout campus.



Applicable SCs	Description
	<ol style="list-style-type: none"> 3. For modernization and upgrade projects involving contributing (significant) buildings or features, the Historic Architect shall work with the Design-Builder and LAUSD to ensure that specifications for design and implementation of projects comply with the applicable historic preservation standards. 4. The Historic Architect shall participate in design team meetings through all phases of the project through 100 percent construction drawings, pre-construction, and construction phases. 5. The Historic Architect shall produce brief memos, at the 50 percent and 100 percent construction drawings stages, demonstrating how principal project components and treatment approaches comply with applicable historic preservation standards, including the Secretary of the Interior’s Standards for the Treatment of Historic Properties and LAUSD Design Guidelines and Treatment Approaches for Historic Schools. The memos will be reviewed by LAUSD and incorporated into the Mitigation Monitoring and Report Plan (MMRP) for the project. 6. The Historic Architect shall participate in pre-construction and construction monitoring activities to ensure continuing conformance with Secretary’s Standards and/or avoidance of a material impairment of the historical resources. 7. The Historic Architect shall provide specialized Construction Specifications Institute (CSI) specifications for architectural features or materials requiring restoration, removal, or on-site storage. This shall include detailed instructions on maintaining and protecting in place relevant features. 8. The Design-Builder and Historic Architect shall be responsible for incorporating LAUSD’s recommended updates and revisions during the design development and review process.
SC-CUL-3	<p>School Design Guide and LAUSD Design Guidelines and Treatment Approaches for Historic Schools.</p> <p>LAUSD has adopted policies and guidelines that apply to projects involving historic resources. The Design-Builder and Historic Architect shall apply these guidelines, which include the LAUSD School Design Guide and LAUSD Design Guidelines and Treatment Approaches for Historic Schools and the Secretary’s Standards for all new construction and upgrade/modernization projects. In keeping with the district’s adopted policies and goals, LAUSD shall re-use rather than destroy historical resources where feasible.</p> <p>LAUSD shall follow the guidelines outlined in these documents to the maximum extent practicable when planning and implementing projects and adjacent new construction involving historical resources. General guidelines shall include:</p> <ul style="list-style-type: none"> • Retain and preserve the historic character of buildings, structures, landscapes, and site features that are historically significant. • Repair rather than remove, replace, or destroy character-defining features; if replacement is necessary, replace in-kind to match in materials and appearance. • Avoid removing, obscuring, or destroying character-defining features and materials. • Treat distinctive architectural features or examples of skilled craftsmanship that characterize a building with sensitivity. • Conceal reinforcement required for structural stability or the installation of life safety or



Applicable SCs	Description
	<p>mechanical systems.</p> <ul style="list-style-type: none"> Undertake surface cleaning, preparation of surfaces, and other projects involving character-defining features using the least invasive, gentlest means possible. Avoid sandblasting and chemical treatments.
SC-CUL-4	<p>Prior to demolition or mothballing activities, LAUSD shall retain a professional architectural photographer and a historian or architectural historian who meets the Secretary of the Interior’s Professional Qualifications Standards to prepare HABS-like documentation for the historical resources slated for demolition.</p> <p>The HABS-like package will document in photographs and descriptive and historic narrative the historical resources slated for demolition. Documentation prepared for the package will draw upon primary- and secondary-source research and available studies previously prepared for the project. Measured drawings shall not be required for the project.</p> <p>The specifications for the HABS-like package follow:</p> <p>Photographs: Photographic documentation will focus on the historical resources/features slated for demolition, with overview and context photographs for the campus and adjacent setting. Photographs will be taken of interior and exterior features of the buildings using a professional-quality single lens reflex (SLR) digital camera with a minimum resolution of 10 megapixels. Photographs will include context views, elevations/exteriors, architectural details, overall interiors, and interior details (if warranted). Digital photographs will be printed in black and white on archival film paper and also provided in electronic format.</p> <p>Descriptive and Historic Narrative: The historian or architectural historian will prepare descriptive and historic narrative of the historical resources/features slated for demolition. Physical descriptions will detail each resource, elevation by elevation, with accompanying photographs, and information on how the resource fits within the broader campus during its period of significance. The historic narrative will include available information on the campus design, history, architect/contractor/designer as appropriate, area history, and historic context. In addition, the narrative will include a methodology section specifying the name of researcher, date of research, and sources/archives visited, as well as a bibliography. Within the written history, statements shall be footnoted as to their sources, where appropriate.</p> <p>Historic Documentation Package Submittal: The draft package will be assembled by the historian or architectural historian and submitted to LAUSD for review and comment. After final approval, one hard-copy set of the package will be prepared as follows: Photographs will be individually labeled and stored in individual acid-free sleeves. The remaining components of the historic documentation package (site map, photo index, historic narrative, and additional data) will be printed on archival bond, acid-free paper.</p> <p>Upon completion of the descriptive and historic narrative, all materials will be compiled in electronic format and presented to LAUSD for review and approval. Upon approval, one hard-copy version of the historic documentation package will be prepared and submitted to LAUSD. The historian or architectural historian shall offer a hardcopy package and compiled, electronic version of the final package to the Los Angeles Public Library (Central Library), Los Angeles Historical Society, and the South Central Coastal Information Center, to make available to researchers.</p>
SC-CUL-5	<p>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.</p>



Applicable SCs	Description
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. LAUSD shall retain a qualified archeologist to make an immediate evaluation of significance and appropriate treatment of the resource. To complete this assessment, the qualified archeologist will be afforded the necessary time to recover, analyze, and curate the find. The qualified archeologist shall recommend the extent of archeological monitoring necessary to ensure the protection of any other resources that may be in the area. Construction activities may continue on other parts of the building site while evaluation and treatment of historical or unique archaeological resources takes place.
SC-CUL-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



Applicable SCs	Description
	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.

According to the PEIR, projects implemented under the SUP have the potential to result in significant and unavoidable impacts relating to adverse changes in the significance of a historical resource as defined in § 15064.5 and less than significant impacts relating to the remaining cultural resources factors. The project-specific analysis provided in **Section 4.5.2** concludes that implementation of the Venice High School Project would also have a less than significant impacts on cultural resources.

4.5.2 Impacts Associated with the Proposed Project

4.5.2.1 Environmental Setting

The project site is located in an urban environment that is developed. Surrounding land uses consist of residential and retail land uses. The Venice High School campus and surrounding area consist of developed lands (structures) with landscaping consisting of ornamental vegetation, both creating highly disturbed areas.

Methodology

A cultural resources analysis was conducted for the project site. It included a California Historic Resources Inventory System (CHRIS) records and literature search at the South Central Coastal Information Center (SCCIC), which is located at California State University, Fullerton. Additionally, a request was made to the Native American Heritage Commission (NAHC) to conduct a search of its Sacred Lands File (SLF) for potential traditional cultural properties as well as to provide a list of local Native American tribes and Tribal representatives to contact. Finally, a pedestrian survey of the campus for archaeological resources was conducted, and two pedestrian surveys for historic architectural resources were completed. The SCCIC records search was conducted on October 24, 2016. The NAHC request was made on October 17, 2016 and a reply was received on October 18, 2016.⁵⁷ No sites were documented in the NAHC’s sacred land file search. However, the NAHC

57 See Appendix C-2.



identified seven local Native American Tribes to contact. Letters were sent to the listed tribes on October 19, 2016 and follow-up telephone calls were completed on November 14, 2016. To date, four responses have been received but no specific Tribal resources have been identified at the project site, though one resource within the 0.5-mile buffer zone was. The pedestrian field survey for archaeological resources was conducted on January 12, 2017. The pedestrian field surveys for historic architectural resources were conducted on October 19 and November 16, 2016. In addition to the above research, previously prepared historical documentation and assessment reports investigating the historical resources at Venice High School were reviewed. The reports were prepared by Heumann (2002); Jerabek, Kainer and Harness (2015); Sapphos (2014); and SWCA (2015). Two technical reports, a project effect assessment (Tang, 2017),⁵⁸ and a cultural resources study,⁵⁹ were also prepared for the proposed project. These documents were used as source material for this cultural resource analysis.

4.5.2.2 Existing Conditions

In 2002, during a system-wide historic resources survey sponsored by LAUSD in conjunction with the Getty Conservation Institute, the Venice High School campus was assigned California Historical Resource Status Codes of “3S” and “3CS,” which means that the subject school appears to be eligible for the National Register and the California Register through survey evaluation.⁶⁰ Therefore, the campus as a whole meets CEQA’s definition of a “historical resource.” A “substantial adverse change” in the historic significance or integrity of the campus, therefore, would constitute “a significant effect on the environment” under CEQA provisions (PRC § 21084.1) (Tang, 2017:1).

When Venice High School first opened in 1911, classes were held in the former Lagoon Bathhouse. A campus in the Neoclassical style was constructed in 1913-1914, but was demolished following the 1933 Long Beach earthquake. Annexed to the Los Angeles School District in 1925, Venice High School was rebuilt by the architectural firm of Austin and Ashley. The new PWA Moderne buildings, completed between 1935 and 1937, included the Administration Building, West Classroom Building, Shop Buildings 1 and 3, the Assembly Hall, Craft Building, and East Classroom Building.

In a 2015 study (PCR 2015), the following components of the campus, all dating to 1935-1937, were determined to be contributors to the significance of this “historical resource” (see **Figure 4.5-1**, Locations of Proposed Development Zones and Contributing Elements to Venice High School, for locations):

Primary Contributors

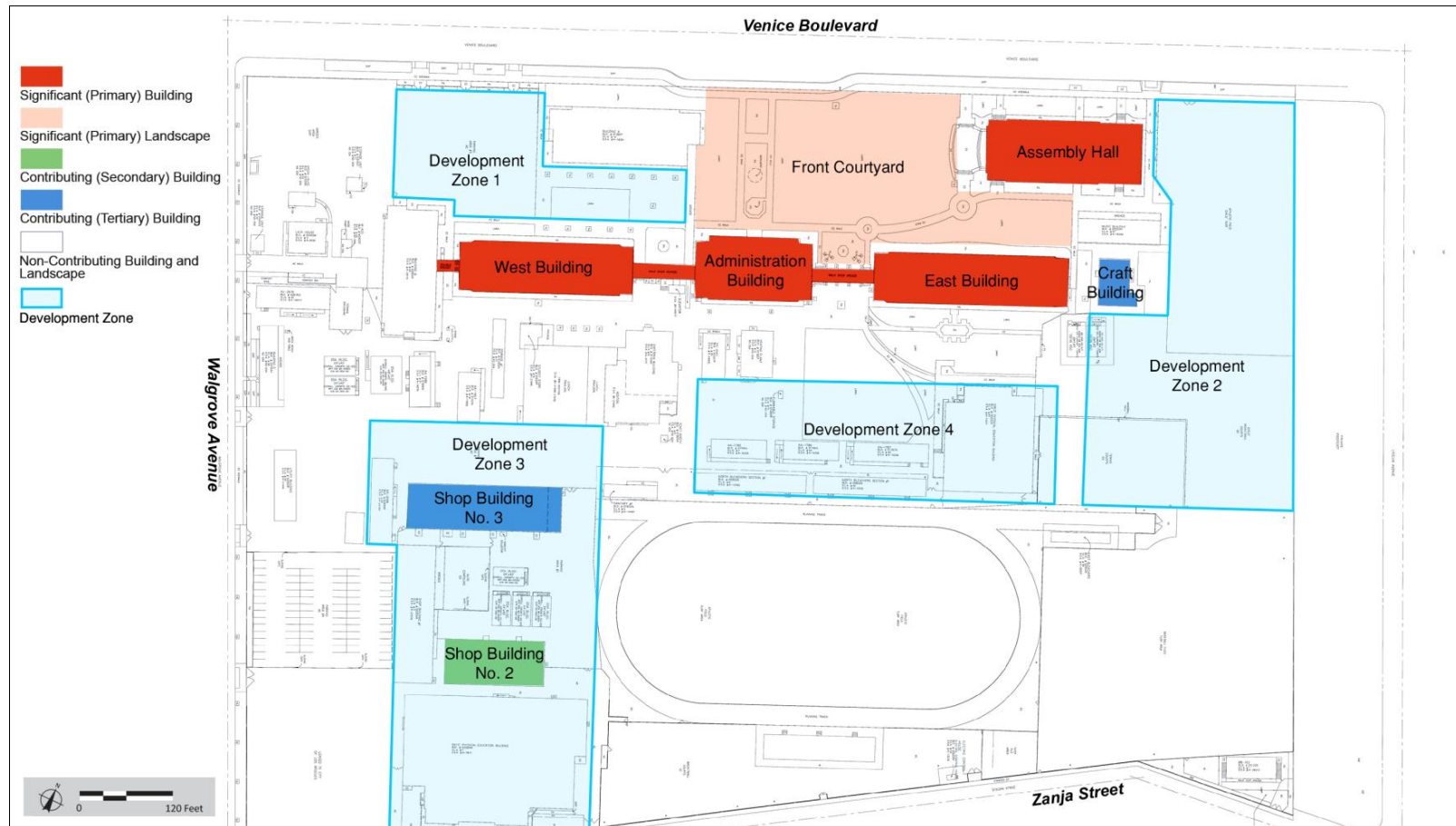
- Administration Building (Building 13),
- Assembly Hall (Auditorium Building 2),
- East Building (originally identified as Senior Building in 1935) (Classroom Building 5),
- West Building (originally identified as Junior Building in 1935) (Classroom Building 15),
- Site plan of the four buildings listed above and front courtyard along Venice Boulevard.

58 See **Appendix C-1**.

59 See **Appendix C-2**.

60 Heumann 2002; Sapphos 2014:3, 78.

**Figure 4.5-1
LOCATIONS OF PROPOSED DEVELOPMENT ZONES AND CONTRIBUTING ELEMENTS TO VENICE HIGH SCHOOL (BASED ON JERABEK ET AL. 2015:7)**





Secondary Contributor

- Shop Building No. 2 (Building 22).

Tertiary Contributors

- Shop Building No. 3 (Building 24),
- Craft Building (also known as Fine Arts Building) (Building 4).

These contributing elements are concentrated in the northern and western portions of the campus. In particular, the five primary contributors, along the southeastern side of Venice Boulevard, essentially formed a coherent and continuous front façade for the school, although the original design for the façade has been altered on the southwestern end by the addition of the 1960 Cunningham Hall and the 1969 Far West Building.

The four 1935-1937 buildings in this group are by design the most high-profile components of the campus, and their street-facing façades present the best examples of the original architectural design by the firm of Austin and Ashley.⁶¹ As identified by Heumann,⁶² the character-defining features of the design include “concrete exteriors, flat roofs, symmetrical composition, juxtaposition of vertical and concrete lines, concave and convex elements, fluted and reeded surfaces, sculptural embellishments, stylized chevrons and dentils, steel and wood-framed sash, and covered outdoor walkways.”

In comparison, the three buildings considered to be secondary or tertiary contributors, although consistent in appearance to the same basic design theme, are less elaborate in architectural detailing, much lower in profile, and are largely concealed from the surrounding public rights-of-way by the other buildings on the campus.⁶³

Historic Resources in the Project Vicinity. The CHRIS archival records search resulted in the identification of no previously identified historic resources within the project site. Two historic period structures were recorded within the 0.5-mile buffer zone but neither was assessed to be qualified for nomination to the National Register. One known prehistoric site, CA-LAN-47, was recorded within the 0.5-mile buffer zone: a shell midden with habitation assemblage consisting of ground and flaked stone, beads and burials; this was largely destroyed during construction of the harbor and a remnant light scatter of lithic flakes was demolished in 1999 during construction of the Price-Costco Plaza approximately 500 feet southwest of the project site.⁶⁴

4.5.2.3 Impact Analysis

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

61 Heumann 2002.

62 *ibid.*

63 **Appendix C-1**; Tang 2017:2.

64 **Appendix C-2**; O’Neil 2017:4-1.



Less Than Significant 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 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 state 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.

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

4.5.2.4 Historical Significance

A previously prepared Character Defining Features Memorandum (CDFM) outlined the significant (primary) and contributing (secondary and tertiary) character-defining buildings and landscapes of Venice High School which date from the period of significance that account for its eligibility as a historical resource (PCR 2015). The primary period of significance for Venice High School is between 1934 and 1937, when the campus was rebuilt in the PWA Moderne style. Significant character-defining buildings and landscapes representing the original period of significance, are visually prominent, and retain high integrity. While contributing character-defining buildings and landscapes retain moderate integrity or may fall outside of the primary period of significance, each significant or contributing building/landscape feature contributes to the visual character and architectural significance of the building/landscape from its period of significance. Non-contributing elements can be found in the resources cited, and non-contributing alterations may be found there as well. The site plan presented as **Figure 4.5-1** visually depicts the character-defining buildings and landscapes of Venice High School (PCR 2015).



4.5.2.5 Impacts Assessment

For the Venice High School Comprehensive Modernization Project, three planning concepts have been proposed by LAUSD, and the project activities would be concentrated in four areas of the campus designated as Development Zones 1-4. The environmental analysis provided in this Initial Study evaluates a “worst case” based upon the potential development presented within the three design concepts. The potential impacts of the project on cultural resources within or adjacent to each of the development zones are analyzed in this section.

The project would also include the installation of various site-wide upgrades to remove identified and prioritized barriers to program accessibility per the Americans with Disabilities Act (ADA; 42 U.S. Code Chapter 126). One such upgrade may include the addition of a ramp to the primary significant Auditorium. Although the ramp would be a reversible feature, the incorporation of SC-CUL-7, would ensure that the project avoids adverse impacts to historic resources.

Development Zone 1

Under Concepts No. 1 and No. 2, a new classroom building designated tentatively as “Building A” may be constructed at the southwestern end of the frontage along Venice Boulevard, next to Cunningham Hall, and on a portion of the faculty and staff parking lot. The new building would be consistent with the characteristics of the 1935-1937 buildings in scale, height, mass, and general appearance, pursuant to the established design guidelines (SWCA 2015). The remaining portion of the existing parking lot would be converted into part of a landscaped Science Quad, which would extend the entire length of the space between Cunningham Hall and West Building.

None of the three planning concepts entails any physical alterations to the contributing elements to the historic significance of the campus. Therefore, no direct impact is anticipated from the proposed project in Development Zone 1.

Development Zone 2

Under all three planning concepts, the existing softball field at the northeast corner of the campus would be converted into a parking lot. Two small portable classroom buildings that do not contribute to the historic significance of the campus, located to the southeast of Craft Building, would be demolished. The southeastern portion of Development Zone 2, which is currently occupied by basketball and tennis courts, would become a new softball field under Concept No. 2, or the site of a new gymnasium under Concepts No. 1 and No. 3.

None of these project activities would have a direct impact on any of the contributing elements to the historic significance of the campus. To minimize potential indirect effects on the buildings nearby, the proposed new gymnasium would be compatible with, but not identical in design to, the contributing buildings in accordance with the established design guidelines (SWCA 2015).

The rest of the proposed project in Development Zone 2 would be concentrated in the area near Craft Building, a tertiary contributor of relatively plain, utilitarian design.



Development Zone 3

Development Zone 3 is located the furthest from the group of primary contributors along Venice Boulevard. At more than 250 feet from the rear (southeastern) façade of West Building, across the existing cafeteria and lunch shelter, the portion of the project in Development Zone 3 has little potential for any effect, either direct or indirect, on the primary contributors.

However, Development Zone 3 contains two of the 1935-1937 buildings that contribute to the significance of the campus, namely Shop Building No. 2, a secondary contributor, and Shop Building No. 3, a tertiary contributor. Also, located in Development Zone 3 are a number of non-contributing buildings, such as the 1951 Boys' Physical Education Building and the 1967 Shop Building No. 1. All of these buildings are slated for demotion under the three proposed planning concepts.

Demolition of Shop Building No. 2 and Shop Building No. 3 would not substantially compromise the architectural merits of the campus that qualify it for listing in the National Register of Historic Places and the California Register of Historical Resources. As documented in the Cultural Resources Project Effects Assessment, the historic district will remain intact and eligible despite removal of Shop Building No. 2 and Shop Building No. 3 (See **Appendix C-1.**)

Development Zone 4

For Development Zone 4, the proposed project calls for the demolition of all existing buildings and structures within and immediately adjacent to the zone boundaries. Under Concept No. 1, the entire zone would be turned into a landscaped courtyard, while Concept No. 2 and Concept No. 3 propose the construction of new building(s) along the southeastern edge of this rectangular-shaped area, leaving the rest to be landscaped. As in the other development zones discussed above, the overall characteristics of the new building(s) would be compatible with, but not identical to, the 1935-1937 buildings.

None of the buildings or structures slated for demolition in and around Development Zone 4 contribute to the historic significance of the campus. None of the three planning concepts proposes any new construction immediately adjacent to the Administration Building or the East Building. Therefore, this portion of the project would not have a direct effect on any contributing elements and the project would not cause a substantial visual, atmospheric, or other indirect impact to the current conditions of the contributing buildings near Development Zone 4.

As documented in the Cultural Resources Study, the Venice High School historic district will remain intact with Implementation of **SC-CUL-1** through **SC-CUL-8** and **SC-CUL-10** through **SC-CUL-12**, which would ensure that potential impacts related to historical resources would be less than significant.

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 SLF by the NAHC, and a pedestrian field survey, is documented in the Phase I Cultural Resources Survey (**Appendix C-2**). 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.

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 which 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.

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 **b) and c)**, the project will not include excavation into previously undisturbed native soils. It is unlikely that human remains would be uncovered during project demolition, excavation, or grading. California Government Code §§ 27460 et seq. mandate 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 Public Resources Code. 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-15** would further ensure that impacts related to the accidental discovery of human remains would be less than significant.



4.6 Geology and Soils

4.6.1 Summary of Impacts

The PEIR evaluated the potential for implementation of the SUP-related site-specific projects to impact geological and soil resources. Upon implementation of regulatory requirements and **SC-GEO-1** for SUP-related projects, it was determined in the PEIR that the impacts associated with seismic hazards, underlying soil characteristics, slope stability, and erosion would be less than significant.

The PEIR 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**, Geology and Soils Standard Condition of Approval.

Table 4.6-1
GEOLOGY AND SOILS STANDARD CONDITION OF APPROVAL

Applicable SCs	Description
SC-GEO-1	<p>OEHS CEQA Specification Manual, Appendix G, Supplemental Geohazard Assessment Scope of Work. This document outlines the procedures and scope for LAUSD geohazard assessments.</p>

According to the PEIR, projects implemented under the SUP are anticipated to have less than significant impacts on geological and soil resources in the LAUSD region. Similarly, the project-specific analysis provided in **Section 4.6.2** concludes that implementation of the Venice High School Project would also have less than significant impacts on geological and soil resources.

4.6.2 Impacts Associated with the Proposed Project

The following evaluation of geology and soils is based, in part, on the technical report entitled “Preliminary Geotechnical Report Proposed Comprehensive Modernization Project, LAUSD Venice High School, 13000 Venice Boulevard, Los Angeles, California” (“Geotechnical Report”).⁶⁵ The Geotechnical Report is included as **Appendix B-1** of this IS/ND and evaluates geological and soil conditions at Venice High School and in the project vicinity, as well as providing site-specific recommendations for appropriate foundations and construction methods.

4.6.2.1 Environmental Setting

Existing Site Conditions

The project site is located within the seismically active Coastal Plain of the Los Angeles Basin near the northern margin of the Peninsular and Transverse Ranges geomorphic provinces. The Transverse Ranges area is structurally characterized by east west trending faults and folds which

65 Group Delta, Preliminary Geotechnical Report (Revision 2) Proposed Comprehensive Modernization Project LAUSD Venice High School, 13000 Venice Blvd, Los Angeles, CA,



dictate the east-west trending mountain ranges and valleys.⁶⁶ The Peninsula Ranges area is structurally characterized by northwest trending faults which dictate the northwest trending mountain ranges and valleys, dissecting the Los Angeles Basin. The Los Angeles Basin is filled with sedimentation thousands of feet thick and the seismicity is largely influenced by thrusting fault blocks and strike slip fault expressions. Along the Coastal Plain of the basin, the topography is low lying flatland gently sloping down to the southwest.⁶⁷

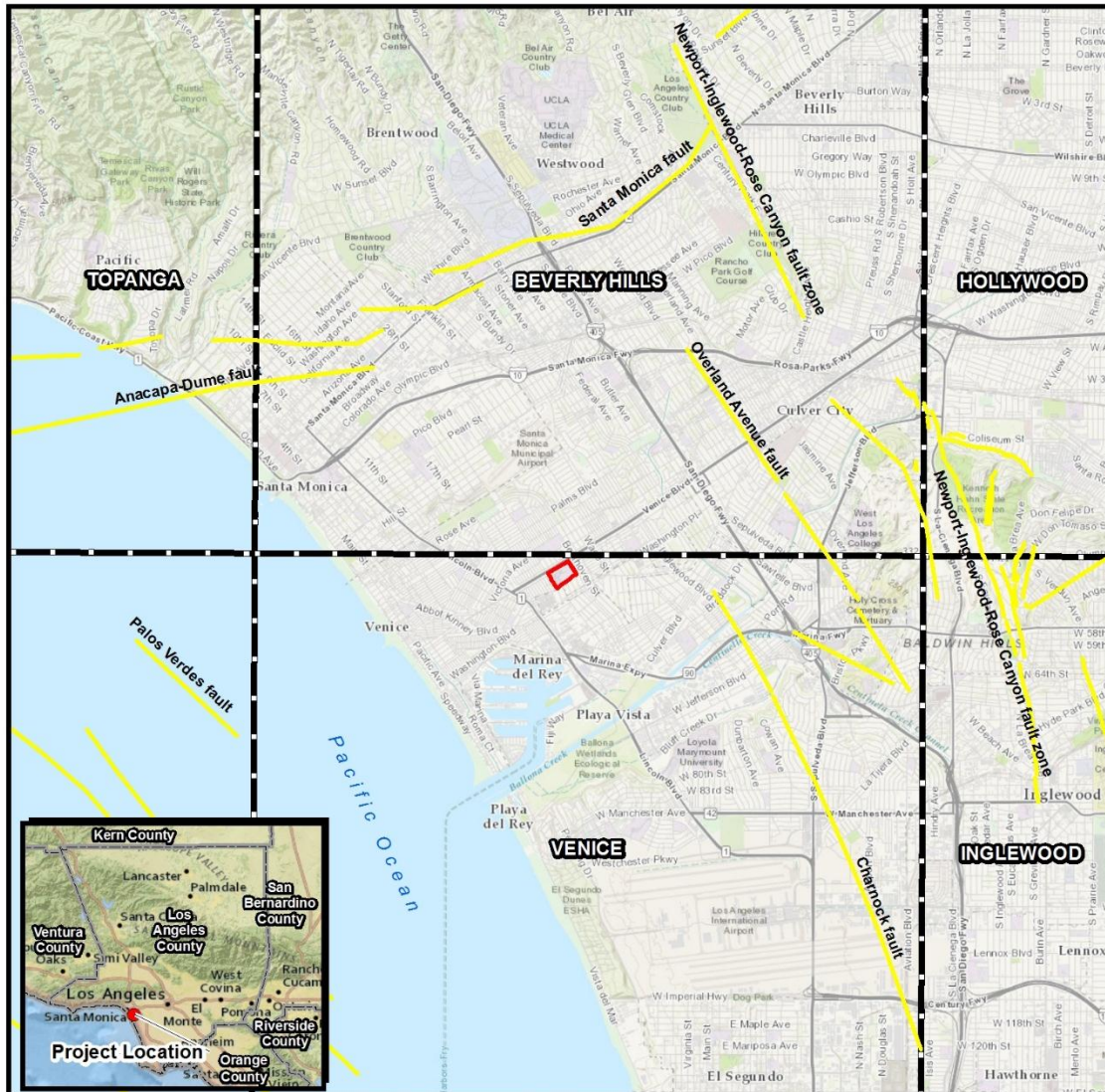
As an existing school campus, the Venice High School campus has been previously graded and compacted. The project site area of the campus is almost completely covered with asphalt that is underlain by native alluvial soils and possibly fill in some areas. From the surface to a depth of 8 to 11 feet below ground surface (bgs), these alluvial soils generally consist of stiff to hard sandy clay. Medium dense to very dense silty sand and sand with very thickly bedded stiff to hard sandy clay are present below a depth of 8 to 13 feet bgs.⁶⁸ Testing indicates that near-surface soils have a very low to low expansion potential.⁶⁹

During the field exploration for the Geotechnical Report, groundwater was encountered between 20 feet and 32.5 feet bgs.⁷⁰ However, a higher, perched, water level can be encountered on the project site, where water perches on top of less permeable soils. The highest historic groundwater level at the project site is reported to be at a depth of 9 feet to 20 feet bgs.⁷¹

Venice High School is not located within an Alquist-Priolo Earthquake Fault Zone or over any known active faults (see **Figure 4.6-1**, Active Faults).⁷² The closest known active fault to the site is the Santa Monica Fault, approximately 3.2 miles north of the campus. The Santa Monica Fault is an east west trending reverse strike-slip fault that could generate a moment magnitude (Mw) 7.3 earthquake if all the fault's segments ruptured at once. If the Potrero Canyon Fault Segment of the Santa Monica Fault ruptured without the other segments, a lesser moment magnitude earthquake of (Mw) 6.6 could be generated.⁷³ The next closest fault is the Newport-Inglewood Fault Zone. This fault system is strike-slip and consists of the Rose Canyon Fault in the San Diego Area, the Newport-Inglewood Fault offshore Orange County and the Newport-Inglewood Fault in the Los Angeles Basin. This fault is about 4.1 miles to the east of the campus, and could produce a moment magnitude (Mw) 7.5 earthquake. Given these distances, the possibility of ground surface fault rupture at the site is considered low.

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- 66 Group Delta, Preliminary Geotechnical Report (Revision 2) Proposed Comprehensive Modernization Project LAUSD Venice High School, 13000 Venice Blvd, Los Angeles, CA, page 2. July 20, 2016.
 - 67 Group Delta, Preliminary Geotechnical Report (Revision 2) Proposed Comprehensive Modernization Project LAUSD Venice High School, 13000 Venice Blvd, Los Angeles, CA, page 2. July 20, 2016.
 - 68 Group Delta, Preliminary Geotechnical Report (Revision 2) Proposed Comprehensive Modernization Project LAUSD Venice High School, 13000 Venice Blvd, Los Angeles, CA, page 5. July 20, 2016.
 - 69 Group Delta, Preliminary Geotechnical Report (Revision 2) Proposed Comprehensive Modernization Project LAUSD Venice High School, 13000 Venice Blvd, Los Angeles, CA, page 17. July 20, 2016.
 - 70 Group Delta, Preliminary Geotechnical Report (Revision 2) Proposed Comprehensive Modernization Project LAUSD Venice High School, 13000 Venice Blvd, Los Angeles, CA, page 7. July 20, 2016.
 - 71 Group Delta, Preliminary Geotechnical Report (Revision 2) Proposed Comprehensive Modernization Project LAUSD Venice High School, 13000 Venice Blvd, Los Angeles, CA, page 7. July 20, 2016.
 - 72 Group Delta, Preliminary Geotechnical Report (Revision 2) Proposed Comprehensive Modernization Project LAUSD Venice High School, 13000 Venice Blvd, Los Angeles, CA, page 5. July 20, 2016.
 - 73 Group Delta, Preliminary Geotechnical Report (Revision 2) Proposed Comprehensive Modernization Project LAUSD Venice High School, 13000 Venice Blvd, Los Angeles, CA, page 3. July 20, 2016.

**Figure 4.6-1
ACTIVE FAULTS**



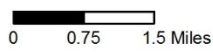
Disclaimer: Representations on this map or illustration are intended only to indicate locations of project parameters reported in the legend. Project parameter information supplied by others (see layer credits) may not have been independently verified for accuracy by UltraSystems Environmental, Inc. This map or illustration should not be used for, and does not replace, final grading plans or other documents that should be professionally certified for development purposes.

Path: J:\Projects\6011_LAUSD_Venice\MXD\SIS_MND\6011_Venice_46_Active_Faults_2016_08_24.mxd
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August 24, 2016

**Venice High School
Comprehensive
Modernization Project**
Regionally Active Faults

Scale 1:95,040



Legend

- Venice High School Parcel Boundary
- Quaternary Fault
- USGS Quadrangle Boundary





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. Four significant earthquakes centered within 30 miles of Venice High School have occurred within the last eight decades: the March 11, 1933 Long Beach earthquake (6.3 magnitude), the February 9, 1971 San Fernando earthquake (6.6 magnitude), the October 1, 1987 Whittier Narrows earthquake (6.0 magnitude) and the January 17, 1994 Northridge earthquake (6.7 magnitude)⁷⁴.

The majority of the project site is not located within a City- or District-designated liquefaction zone.^{75,76} However, a small portion of the southwest corner of the project site is located in a liquefaction zone (see **Figure 4.6-2, Landslides and Liquefaction**).⁷⁷ Preliminary analyses indicate that potentially-liquefiable soils are present in the southwest corner of the campus, from approximately 9 to 13 feet below ground surface.

The property is not mapped within a State of California Earthquake Induced Landslide Zone (CGS, 2015) or in a City of Los Angeles Landslide Zone. The area is relatively flat; therefore, slope instability and land sliding is not considered an issue for the project site.

4.6.2.2 Impact Analysis

- a) **Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:**
- b) **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

The hazard of fault-rupture is generally considered to be associated with a relatively narrow zone along well-defined pre-existing active or potentially active faults.⁷⁸ Venice High School is not located within an Alquist-Priolo Earthquake Fault Zone or over any known active or potentially active faults. 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 Venice 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, foundation, and retaining wall specifics, and outline the conditions under which the buildings should be constructed.⁷⁹ Furthermore, the Division of State Architect (DSA) approves designs for school construction, and all

74 Gorian Associates, Inc. Geotechnical Evaluation and Infiltration Testing, Proposed Student Store and Lunch Pavilion, Venice High School, 13000 Venice Boulevard, Los Angeles, California. March 27, 2014.
75 City of Los Angeles Department of City Planning, Zoning Information and Mapping System (ZIMAS). Website: zimas.lacity.org. Accessed October 2016.
76 LAUSD School Upgrade Program Draft EIR, Figure 5.6-2 – Liquefaction Zones, September 2015.
77 State of California, Division of Mines and Geology, Seismic Hazards Zones, Venice Quadrangle, March 25, 1999.
78 Gorian Associates, Inc. Geotechnical Evaluation and Infiltration Testing, Proposed Student Store and Lunch Pavilion, Venice High School, 13000 Venice Boulevard, Los Angeles, California. March 27, 2014.
79 Group Delta, Preliminary Geotechnical Report (Revision 2) Proposed Comprehensive Modernization Project LAUSD Venice High School, 13000 Venice Blvd, Los Angeles, CA, pages 9 through 17, July 20, 2016.



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 California Building Code (CBC) requirements.⁸⁰ 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 effects of seismic shaking and adverse soil conditions.⁸¹

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 all projects that involve grading, excavation or other ground-disturbing activities. Compliance with DSA and 2016 CBC requirements,⁸² 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.

c) Strong seismic ground shaking?

Less Than Significant

As previously noted, 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. 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 DSA and CBC requirements, as well as implementation of **SC-GEO-1**, would ensure that potential hazards from strong seismic ground shaking would be less than significant. No mitigation measures or further evaluation are required.

d) Seismic-related ground failure, including liquefaction?

Less Than Significant

Except for a small area at the southwestern corner of the Venice High School campus, the project site is not located within a mapped seismic hazard zone for liquefaction. The liquefaction potential, particularly in the southwest corner of the campus, would be outlined in a design-level geotechnical plan that will be developed for the project as a part of the project design and as specified in **SC-GEO-1**.

In addition to design-level 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 DSA and CBC requirements, as well as implementation of **SC-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.

80 State of California, California Building Standards Code (California Code of Regulations, Title 24, 2016 Triennial Edition [effective January 1, 2017]).

81 LAUSD School Upgrade Program Draft EIR, page 5.1-5. September 2015.

82 2016 CBC: Chapter 4, Codes 401.2.3, 403.9, 407.4.1; and Chapter 3, Codes 317.5, 319.

**Figure 4.6-2
LANDSLIDES AND LIQUEFACTION**



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Scale 1:95,040

N

0 0.75 1.5 Miles

0 0.75 1.5 Kilometers

- Legend**
- Venice High School Parcel Boundary
 - USGS Quadrangle Boundary
 - Earthquake-induced Landslides
 - Liquefaction

**Venice High School
Comprehensive
Modernization Project**
Landslides and Liquefaction





e) 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.⁸³ The project site is relatively flat and therefore slope instability and land sliding is not considered an issue for the site. Implementation of the proposed project would not expose people or structures to substantial adverse hazards due to landslides, and there would be no impact in this regard.

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

Less Than Significant

The ground surface will be disturbed 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 (per **SC-GEO-1**). In addition, as the proposed project is greater than one acre, LAUSD's construction contractor would prepare and comply with a Storm Water 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 or the loss of top soil to less than significant levels.

g) 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 Venice 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 there is no ongoing oil or groundwater extraction on the project site or within the immediately surrounding area.⁸⁴ As discussed above, there is no impact related to landslides. With the exception of a small area at the southwestern corner of the campus, the campus is not located within a mapped seismic hazard zone for liquefaction (See **Figure 4.6-2**). In addition to design-level geotechnical recommendations that would be implemented into the project's design and construction of new buildings, the project will comply with seismic safety requirements of the DSA and CBC. Compliance with DSA and CBC requirements, as well as implementation of **SC-GEO-1**, would ensure that impacts associated with associated with unstable geology or unstable soils, including liquefaction would be less than significant.

h) 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?

83 Group Delta, Preliminary Geotechnical Report (Revision 2), Proposed Comprehensive Modernization Project, LAUSD Venice High School, 13000 Venice Boulevard, Los Angeles, CA, page 7. July 20, 2016.

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



Less Than Significant

As previously noted, the Venice High School campus has been previously graded and compacted. Testing indicates that near-surface soils have a very low to low expansion potential.⁸⁵ However, as with all new school construction efforts, design-level geotechnical studies will analyze soil samples for expansion potential, and geotechnical recommendations may include ground stabilization, selection of appropriate foundation type and depths, and the selection of appropriate structural systems. Compliance with 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.

- i) **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.

85 Group Delta, Preliminary Geotechnical Report (Revision 2) Proposed Comprehensive Modernization Project LAUSD Venice High School, 13000 Venice Blvd, Los Angeles, CA, July 20, 2016.



4.7 Greenhouse Gas Emissions

4.7.1 Summary of Impacts

The PEIR 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 PEIR 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**, Greenhouse Gas Emissions Standard Conditions of Approval and are provided in the **Section 7.0**. These include SCs for minimizing potential project-specific impacts related to GHG emissions.

**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.



Applicable SCs	Description
SC-USS-1	<p>School Design Guide. Construction and demolition waste shall be recycled to the maximum extent feasible. LAUSD has established a minimum non-hazardous construction and demolition debris recycling requirement of 75% by weight as defined in Specification 01340, Construction & Demolition Waste Management.</p> <p>Guide Specifications 2004 - Section 01340, Construction & Demolition Waste 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.</p>

According to the PEIR, projects implemented under the SUP are anticipated to have less than significant cumulative impacts on climate change in the LAUSD region. Similarly, project-specific analysis provided in **Section 4.7.2** concludes that implementation of the Venice High School Comprehensive Modernization Project would also have less than significant cumulative impacts on climate change.

4.7.2 Impacts Associated with the Proposed Project

4.7.2.1 Environmental Setting

Because GHG emissions are evaluated in a global (or sometimes regional) context, as previously noted, the project-related climate change impacts are inherently cumulative.

Section 5.7.1.1 of the PEIR contains a summary of national and state laws, regulations, plans and guidelines relevant for analyzing the impacts of GHG emissions from SUP projects in general, as of September 2015. 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 2030.⁸⁶ 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.

4.7.2.2 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 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 (California Air Pollution Control Officers Association, 2016). CalEEMod is a planning tool for estimating emissions related to land use projects. Construction emission results are presented in **Table 4.7-2**, Construction Greenhouse Gas Emissions from Venice High School Comprehensive Modernization Project.

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

Construction Year	GHG Emissions (Metric Tons CO ₂ Equivalent)		
	2018	2019	2020
Annual GHG Emissions	429	476	31
Total Construction Emissions	936		
Amortized Annual Emissions	31.2		
SCAQMD’s Significance Threshold	3,000		
Exceeds Significance Threshold	No		

Amortized annual GHG emissions are 31.2 metric tons of CO₂ equivalent per year. Given that school enrollment is projected to remain the same or decline following the project, and that **SC-GHG-1** through **SC-GHG-5** 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 CO₂e. Therefore, GHG emissions will be less than significant.

- 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 Venice High School will stay the same or decrease over the years, due to declining long-term enrollment and increased energy efficiency of

86 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>.



❖ GREENHOUSE GAS EMISSIONS ❖

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 PEIR or presented in **Section 4.7.2.1**. Therefore, the project's GHG emissions impacts will be less than significant.



4.8 Hazards and Hazardous Materials

4.8.1 Summary of Impacts

The PEIR evaluated the potential for implementation of the SUP-related 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 PEIR 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**, Hazards and Hazardous Materials Standard Conditions of Approval and in **Section 7.0**.

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

Applicable SCs	Description
SC-AQ-1	<p>OEHS CEQA Specification Manual, Appendix J, Air Toxics Health Risk Assessment (HRA).</p> <p>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.</p>

According to the PEIR, projects implemented under the SUP are anticipated to have less than significant impacts related to hazards and hazardous materials in the LAUSD region. Similarly, the project specific analysis provided in **Section 4.8.2** below concludes that implementation of the Venice High School Project would have less than significant impacts or no impacts related to hazards and hazardous materials.

4.8.2 Impacts Associated with the Proposed Project

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”),⁸⁷ Preliminary Environmental Assessment (PEA),⁸⁸ and Remedial Action Workplan (RAW).⁸⁹ The Phase I ESA, PEA and RAW, which are included as **Appendix F**, 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 soil affected; and propose measures to remove the 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 Venice High School.

87 LAUSD (Prepared by AECOM). 2016. Phase I Environmental Site Assessment, Venice High School, 13000 Venice Boulevard, Los Angeles, California 90066. Los Angeles, CA.

88 LAUSD (Prepared by AECOM). 2016. Preliminary Environmental Assessment for the Venice High School Comprehensive Modernization Project, Venice High School 13000 West Venice Boulevard, Los Angeles, California 90066. Los Angeles, CA.

89 LAUSD (Placeworks). 2017. Removal Action Work Plan for the Venice High School Comprehensive Modernization Project. Los Angeles, CA.



4.8.2.1 Environmental Setting

Existing Site Conditions

The Phase I ESA revealed the following RECs (as that term is defined in ASTM Standard Practice E1527-00) in connection with the Site.

Onsite RECs

- Hydraulic lifts – Two underground hydraulic lifts were observed in the automotive repair shop. 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,
- The western corner of the project site is currently used as a garden and appears to have been since before 1970. 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 buildings and structures onsite and the historic agricultural uses, there is potential for asbestos-containing materials (ACM), polychlorinated biphenyls (PCBs), lead based paint (LBP), lead, arsenic, and organochlorine pesticides (OCPs) in the soil.

Any activity that involves cutting, grinding, or drilling during building renovation or demolition, or that involves relocation of underground utilities, could release friable asbestos fibers unless proper precautions are taken. The federal Clean Air Act regulates asbestos as a hazardous air pollutant, which subjects it to regulation by the South Coast Air Quality Management District (SCAQMD) under its Rule 1403. The federal Occupational Safety and Health Administration (OSHA) also regulates asbestos as a potential worker safety hazard. The Asbestos-Containing Materials in Schools rule (Code of Federal Regulations [CFR] Title 40, Part 763, Subpart E), promulgated under the federal Asbestos Hazard Emergency Response Act (AHERA), requires local education agencies to inspect their school buildings for asbestos-containing building material, prepare asbestos management plans, and perform asbestos response actions to prevent or reduce asbestos hazards. AHERA also tasked EPA with developing a model plan for states for accrediting persons conducting asbestos inspection and corrective-action activities at schools.

The following items do not meet the ASTM definition of a REC; however, they demonstrate the environmental setting as it relates to this impact analysis:



- The southwest corner of the project site is located in a liquefaction zone,
- The Santa Monica Municipal Airport is located just over one mile to the north,
- The Ritz-Carlton Hotel Company Heliport is located just under one mile to the southwest,
- A high pressure natural gas pipeline is located along Zanja Street to the south of the proposed project. A 10-inch crude oil pipeline operated by Crimson Pipeline, L. P. is located along Walgrove Avenue to the west of the project site.

The PEA prepared for the project included a review of the Phase I ESA for Venice High School and sampling of shallow soil at the project site. Elevated concentrations of arsenic and lead were identified in 19 locations within the project site.⁹⁰ The source of the arsenic-impacted soil may be the historical use of arsenical-based herbicides for weed control in both paved and unpaved areas.⁹¹ Historically, arsenic was widely used as a pesticide and herbicide and was commonly used at industrial sites as a soil sterilizer.⁹² The source of the lead-impacted soil may be the historical use of lead-based paint in previously demolished and existing buildings.⁹³ In response to the potential harmful effects from lead, the U.S. Consumer Product Safety Commission banned the application of paint containing more than 600 milligrams per kilogram of lead on residential structures in 1978.⁹⁴ Weathering, scraping, chipping, and abrasion can cause lead to be released to, and accumulated in, soil around old structures constructed before 1978.⁹⁵

Based on the findings of the PEA, a Remedial Action Workplan (RAW)⁹⁶ was prepared to: (1) summarize the chemical and physical data from the PEA; (2) estimate the affected area of the site and volumes of soil affected, and; (3) propose measures to reduce the arsenic and lead concentrations in the affected areas of the site to levels below regulatory screening levels for the protection of human health and the environment.⁹⁷ The RAW is also consistent with the criteria specified in the California Health and Safety Code (H&SC) § 25356.1(h) and includes a description of the onsite impact, a plan for conducting the removal action, and the goals to be achieved by the removal action, as required by H&SC § 25323.1.⁹⁸

Three removal alternatives were evaluated in the RAW for the arsenic-impacted soil at the site. These alternatives were screened and evaluated on the basis of their effectiveness, implementability, and cost in the RAW. The alternatives are:

- 1) Alternative 1 – No Action: This alternative includes no institutional controls, no treatment of soil, and no monitoring. There are no costs associated with this alternative;

90 LAUSD (Prepared by Ninyo & Moore). 2016. Preliminary Environmental Assessment for the Comprehensive Modernization Project, Venice High School. Los Angeles, CA. And LAUSD (Prepared by Placeworks). 2017. Removal Action Work Plan for the Venice High School Comprehensive Modernization Project. Los Angeles, CA.

91 LAUSD (Prepared by Placeworks). 2017. Removal Action Work Plan for the Venice High School Comprehensive Modernization Project. Los Angeles, CA.

92 Ibid.

93 Ibid.

94 Ibid.

95 Ibid.

96 Ibid.

97 LAUSD (Prepared by Ninyo & Moore). 2016. Preliminary Environmental Assessment for the Comprehensive Modernization Project, Venice High School. Los Angeles, CA.

98 LAUSD (Prepared by Placeworks). 2017. Removal Action Work Plan for the Venice High School Comprehensive Modernization Project. Los Angeles, CA.



- 2) Alternative 2 – Soil Excavation and Off-Site Disposal: This alternative would entail excavation and offsite recycling, reuse, or direct landfilling of an estimated 204 cubic yards of arsenic and lead impacted soil to depths ranging from 1.5 and 2.5 feet below ground surface. The estimated total cost of this alternative is \$173,460;
- 3) Alternative 3 – Soil Excavation with On-Site Burial, Capping, and Land Use Restrictions: This alternative consists of the excavation of approximately 204 in-place cubic yards of arsenic and lead impacted soil. However, rather than off-site disposal, the majority of the excavated soil would be placed in an engineered on-site burial cell and covered by a protective cap.
- 4) The cap could either be clean soil or pavement. The estimated cost of this alternative is \$208,910.

Alternative 2, Soil Excavation and Off-Site Disposal is the preferred approach because it is effective (it is comprehensive, feasible and cost effective) and less expensive than Alternative 3, and may be implemented without significant challenges. Once the impacted soil has been removed, soil samples will be collected from some of the exposed excavation sidewalls and bottoms to confirm that the site-specific cleanup goals have been met and the remedial action objectives have been achieved. The remedial action would be conducted in general accordance with the California Department of Toxic Substances Control (DTSC) and United States Environmental Protection Agency (USEPA) regulations and guidelines applicable to school sites, including the remediation or mitigation of any detected contamination to levels that are protective of human health.⁹⁹ Excavations will be backfilled and graded with clean soil from the project construction operations.¹⁰⁰

4.8.2.2 Impact Analysis

- c) **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 the applicable standards and regulations, including but not limited to the Resource Conservation and Recovery Act (RCRA); Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA); California hazardous waste control law;¹⁰¹ Occupational Safety and Health Administration (OSHA), Los Angeles County Fire Authority (LCFA), and the Los Angeles County Health Care Agency (LCHCA) 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

99 LAUSD (Prepared by Placeworks). 2017. Removal Action Work Plan for the Venice High School Comprehensive Modernization Project. Los Angeles, CA.

100 LAUSD (Prepared by Placeworks). 2017. Removal Action Work Plan for the Venice High School Comprehensive Modernization Project. Los Angeles, CA.

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



paint. Proposed project construction would be temporary, and onsite activities would be governed by existing regulations of several agencies.

Prior to demolition or renovation of any of Venice High School's existing buildings, any ACM, LBP, or PCBs 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.¹⁰² 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.¹⁰³ 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 Venice 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 § 13280 (Asbestos Abatement and Asbestos Related Disturbance, November 21, 2003) will be implemented as needed.¹⁰⁴

Many of the Venice High School buildings may also contain LBP. All projects at existing school sites must be reviewed by LAUSD's Asbestos Technical Unit for impacts to 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 § 13282 (Lead Abatement and Lead Related Construction Work, March 15, 2007) and LAUSD § 13614 (Abatement of Hazardous Materials, July 7, 2003) will be implemented as appropriate.¹⁰⁵

There is also potential for hydraulic oil, lead, arsenic, and organochlorine pesticides in the soil. The RAW assumes the implementation of best management practices, security measures, field documentation, an excavation plan, air and meteorological monitoring, a fugitive dust plan, transportation for off-site disposal plan, a site restoration plan, post removal action sampling, and procedures that will ensure that the Project does not have the potential to impact people or the environment.¹⁰⁶ The removal action described in the RAW would be conducted in accordance with the Transportation Plan provide in the RAW as well as the applicable federal and state requirements governing hazardous materials excavation, onsite handling, and offsite transport to minimize potential exposures to construction workers, campus occupants and the general public.¹⁰⁷

During operation, the types of hazardous materials associated with the operation of the proposed project would generally be limited to those associated with janitorial, maintenance, and repair

102 LAUSD Facilities School Maintenance and Operations Repair & Construction Safety Standards, February 28, 2013.

103 LAUSD Office of the Inspector General, Report of Audit, Asbestos Technical Unit, October 2, 2001.

104 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.

105 LAUSD (Prepared by Placeworks). 2017. Removal Action Work Plan for the Venice High School Comprehensive Modernization Project. Los Angeles, CA.

106 LAUSD (Prepared by Ninyo & Moore). 2016. Removal Action Work Plan for the Comprehensive Modernization Project, Venice High School 13000 West Venice Boulevard, Los Angeles, California 90066. Los Angeles, CA available for review online at: <http://achieve.lausd.net/Page/3953>.

107 LAUSD (Prepared by Placeworks). 2017. Removal Action Work Plan for the Venice High School Comprehensive Modernization Project. Los Angeles, CA.



❖ HAZARDS AND HAZARDOUS MATERIALS ❖

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.

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.

d) 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 response to **Checklist Question 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, PCBs, or pesticides) are present on the project site, they would be removed in accordance with applicable standards and regulations, including, but not limited to SCAQMD Rule 1403; Asbestos-Containing Materials in Schools rule (Code of Federal Regulations [CFR] Title 40, Part 763, Subpart E); LAUSD Section 13280: Asbestos Abatement and Asbestos Related Disturbance; LAUSD Section 13282: Lead Abatement and Lead Related Construction Work; and LAUSD Section 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 in order 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 ensure 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.

e) 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 Venice High School, the project site, Mark Twain Middle School is located less than 0.25 mile from the project site. The proposed project is an existing school campus and would not emit hazardous emissions or handle significant quantities of hazardous or acutely hazardous materials, substances, or waste. As previously noted, hazardous materials expected at the project site would be associated with janitorial, maintenance, and repair activities. 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. These materials would be used in small quantities and would be stored in compliance with established state and federal requirements. Additionally, 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. The removal activities outlined in the RAW would be conducted, handled and transported in accordance with the RAW in order to avoid or limit potential impacts.¹⁰⁸ Additionally, work activities would be coordinated with the campus administration in order to avoid potential conflicts or instances involving hazards and hazardous materials. Therefore, impacts would be less than significant.

- f) 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

Venice High School is not listed as a hazardous 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.¹⁰⁹ Therefore, no impacts would occur.

- g) 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?**

108 LAUSD (Prepared by Placeworks). 2017. Removal Action Work Plan for the Venice High School Comprehensive Modernization Project. Los Angeles, CA.

109 LAUSD (Prepared by AECOM). 2016. Phase I Environmental Site Assessment, Venice High School, 13000 Venice Boulevard, Los Angeles, California 90066. Los Angeles, CA.



No Impact

The Santa Monica Municipal Airport is located just over one mile to the north of Venice High School (see **Figure 4.8-1**, Airport Influence Area). However, the project site is not located in that airport's influence area.¹¹⁰ Per California Education Code § 17215, the District must receive approval from the California Department of Education and California Department of Transportation before acquiring title to property for a new school site if the proposed site is within 2 nautical miles of an airport runway. However, California Education Code § 17215 does not apply to school sites, such as Venice High School, which were acquired prior to January 1, 1966, nor to any additions or extensions to those sites. Venice High School is an existing campus acquired prior to January 1, 1966 and the proposed project would be constructed within the existing Venice High School campus. Additionally, the Santa Monica Municipal Airport is scheduled to close in 2028.¹¹¹ Therefore, no impacts are anticipated.

- h) 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. There is a heliport located just under one mile southwest of the project site. Venice High School is an existing campus; therefore, the proposed project would not create any new safety hazards associated with heliport operations, and no impact would occur in this regard. No mitigation measures or further evaluation are required.

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

No Impact

Venice 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."¹¹² 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. The project would not alter emergency access to the campus or the surrounding area. 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 impact would occur in this regard.

110 Airport Land Use Commission (ALUC), Los Angeles County. Santa Monica Airport Influence Area. May 13, 2003. http://planning.lacounty.gov/assets/upl/project/aluc_airport-santa-monica.pdf. Accessed October 2016.

111 Santa Monica Municipal Airport, <https://www.smgov.net/departments/airport/>. Accessed March 9, 2017.

112 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.



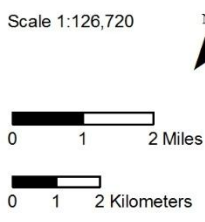
**Figure 4.8-1
AIRPORT INFLUENCE AREA**



Disclaimer: Representations on this map or illustration are intended only to indicate locations of project parameters reported in the legend. Project parameter information supplied by others (see layer credits) may not have been independently verified for accuracy by UltraSystems Environmental, Inc. This map or illustration should not be used for, and does not replace, final grading plans or other documents that should be professionally certified for development purposes.

Path: J:\Projects\6011_LAUUSD_Venice\MXD\SIS_MND\6011_Venice_48_Airport_Influence_Area_2016_08_24.mxd
 Service Layer Credits: Sources: Esri, HERE, DeLorme, USGS, Intermap, INCREMENT P, NRCan, Esri Japan, METI, Esri China (Hong Kong), Esri Korea, Esri (Thailand), MapmyIndia, NGCC, © OpenStreetMap contributors, and the GIS User Community, Cal Fire, 2007, LA County, March 30, 2016, UltraSystems Environmental, Inc., 2016

August 24, 2016



**Venice High School
Comprehensive
Modernization Project**
Airport Influence Area





- j) 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

Venice 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.¹¹³ 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.

113 City of Los Angeles Department of Planning, General Plan Safety Element, Exhibit D – Selected Wildfire Hazard Areas in the City of Los Angeles, November 26, 1996.



4.9 Hydrology and Water Quality

4.9.1 Summary of Impacts

The PEIR 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 PEIR 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**, Hydrology and Water Quality Standard Conditions of Approval and in **Section 7.0**. These include SCs for minimizing potential project-specific impacts related to hydrology and water quality.

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

Applicable SCs	Description
SC-HWQ-1	<p>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.</p>
SC-HWQ-2	<p>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</p>
SC-HWQ-3	<p>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</p>

According to the PEIR, projects implemented under the SUP are anticipated to have less than significant impacts on hydrology and water quality in the LAUSD region. Similarly, the project-specific analysis provided in **Section 4.9.2** concludes that implementation of the Venice High School Project would also have less than significant impacts on hydrology and water quality.



4.9.2 Impacts Associated with the Proposed Project

4.9.2.1 Environmental Setting

Existing Site Conditions

Venice High School is located in the Santa Monica Bay Watershed. The Santa Monica Bay Watershed spans 673 square miles, ranging from the west end of the Santa Monica Mountains in Ventura County to parts of the western Los Angeles Basin and south to the coastal side of the Palos Verdes Peninsula.¹¹⁴ The southeast corner of the watershed is in the Community of San Pedro in the City of Los Angeles. Many streams in the Santa Monica Mountains, Palos Verdes Hills, and Los Angeles Basin provide drainage in the watershed. Ballona Creek is the major drainage route for much of the part of the watershed in the Los Angeles Basin, including the City of Los Angeles and Venice High School.

Venice High School is underlain by the Santa Monica sub-basin of the Coastal Plain of Los Angeles Groundwater Basin. The Santa Monica sub-basin is bounded on the south by the Ballona Escarpment, on the east by the Newport–Inglewood Fault Zone, on the west by the Pacific Ocean, and on the north by the consolidated rocks of the Santa Monica Mountains.¹¹⁵

Groundwater was encountered during the field exploration for the geotechnical report between 20 feet and 32.5 feet bgs.¹¹⁶ However, a higher, perched, water level can be encountered on the project site, where water perches on top of less permeable soils. The highest historic groundwater level at the project site is reported to be at a depth of 9 feet to 20 feet bgs.¹¹⁷

The campus is not located in a Federal Emergency Management Agency (FEMA) mapped flood hazard zone including any 100-year flood hazard zone (see **Figure 4.9-1**, FEMA Firm).¹¹⁸ The project site 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. The school is also not in a dam or tsunami inundation zone.^{119,120}

114 LAUSD School Upgrade Program Draft EIR, page 5.9-14, September 2015.

115 LAUSD (Prepared by AECOM). 2016. Phase I Environmental Site Assessment, Venice High School, 13000 Venice Boulevard, Los Angeles, California 90066. Los Angeles, CA.

116 Group Delta, Preliminary Geotechnical Report (Revision 2) Proposed Comprehensive Modernization Project LAUSD Venice High School, 13000 Venice Blvd, Los Angeles, CA, page 7. July 20, 2016.

117 Group Delta, Preliminary Geotechnical Report (Revision 2) Proposed Comprehensive Modernization Project LAUSD Venice High School, 13000 Venice Blvd, Los Angeles, CA, page 7. July 20, 2016.

118 FEMA, Flood Insurance Rate Map, Los Angeles County, California, Map Number 06037C1752F, Effective Date September 26, 2008

119 State of California, Division of Mines and Geology, Seismic Hazards Zones, Venice Quadrangle, March 25, 1999.

120 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.



4.9.2.2 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 (PRD) demonstrating compliance and coverage under the Los Angeles Regional Water Quality Control Board (RWQCB) General Permit for Stormwater Discharges Associated with Construction and Land Disturbance Activities (Order No. 2012-0006-DWQ; NPDES No. CAS000002).¹²¹

The District has a program-wide stormwater pollution prevention plan (SWPPP) developed in 2005, updated in 2007, and again in 2009.¹²² The program-wide SWPPP, developed by LAUSD in consultation with the Los Angeles Regional Water Quality Control Board (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 § 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).¹²³ The proposed project would be completed in accordance with LAUSD requirements and applicable regulations pertaining to stormwater runoff, including:

- Preparing and implementing sediment and erosion control 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 National Pollutant Discharge Elimination System (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 would 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 avoid potential

121 LAUSD School Upgrade Program Draft EIR, page 5.9-7, September 2015.

122 LAUSD School Upgrade Program Draft EIR, page 5.9-26, September 2015.

123 City of Los Angeles. LA Stormwater. Standard Urban Stormwater Mitigation Plan. <http://www.lastormwater.org/green-la/low-impact-development/>. Accessed March 9, 2017.



impacts to the Maximum Extent Practicable (MEP). While these guidelines were developed in 2009 in anticipation of a forthcoming NPDES Phase II MS4 Permit, they are intended to meet current post-construction Standard Urban Stormwater Mitigation Plan (SUSMP) 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.¹²⁴

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 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.¹²⁵ LAUSD's stormwater runoff control programs and standard conditions, 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.

- 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. Groundwater at the project site was encountered at approximately 20 feet bgs.¹²⁶ No groundwater extraction activities would occur, and no wells would be constructed. The project site currently contains impervious surfaces. It is expected that the area of impervious surfaces on the project site after completion of the proposed project would be reduced or similar to existing conditions as a result of the project design. Project design features would include mechanisms to control runoff from the newly impervious areas, and promote on-site percolation. Therefore, there would not be a decrease in percolation of water from the site into groundwater because of new impervious surfaces. 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 Standards, 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.

124 LAUSD School Upgrade Program Draft EIR, page 5.9-12, September 2015.

125 LAUSD School Upgrade Program Draft EIR, page 5.9-26, September 2015.

126 Group Delta, Preliminary Geotechnical Report (Revision 2) Proposed Comprehensive Modernization Project LAUSD Venice High School, 13000 Venice Blvd, Los Angeles, CA, page 7. July 20, 2016.



- 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 or near the project site. The existing drainage pattern on the project site may be improved as a result of the proposed project. LAUSD standard practices require 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.¹²⁷ 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 proposed project 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,¹²⁸ during project siting, construction and operation would ensure that impacts associated with alteration of the drainage pattern that would result in substantial erosion or siltation on- or off-site, are less than significant.

- d) Would the project substantially alter the existing drainage pattern of the site or area, including through the alternation 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

Runoff from the project site currently discharges into the surrounding street storm drains. The project site is currently developed and implementation of the proposed project would not significantly alter drainage patterns. While the project site is under construction, the rate and amount of surface runoff generated thereon 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 would also be improved as a part of the project; therefore, implementation of the proposed project would have the potential to improve the management of stormwater runoff from the site. The proposed project would not increase the risk of flooding in the surrounding area. LAUSD's construction contractor would 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,¹²⁹ and

127 LAUSD School Upgrade Program Draft EIR, page 5.9-26, September 2015.

128 City of Los Angeles. LA Stormwater. Standard Urban Stormwater Mitigation Plan. <http://www.lastormwater.org/green-la/low-impact-development/>. Accessed March 9, 2017.

129 City of Los Angeles. LA Stormwater. Standard Urban Stormwater Mitigation Plan. <http://www.lastormwater.org/green-la/low-impact-development/>. Accessed March 9, 2017.



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.

- 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 site-specific 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 applied 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, 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 requiring review and approval of grading plans as they relate to design and construction of on-site improvements that affect drainage. LAUSD would comply with California Government Code § 53097 in implementing the proposed project. This compliance would ensure that the proposed project would not have a significant adverse effect on the local drainage system. The implementation of engineered drainage improvements would ensure that impacts to existing or planned drainage systems would be less than significant. Compliance with applicable laws, regulations, and **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.

- 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. With incorporation of LAUSD Standards, the proposed project would not substantially increase pollutants. Therefore, the project would not substantially degrade water quality, and impacts would be less than significant. LAUSD's stormwater runoff control programs and standard conditions, 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.

- 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. The project site is not located within a 100-year flood hazard area.¹³⁰ 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.¹³¹ Therefore, there would be no impact in this regard.

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 the response to **Checklist Question g)**, the project site is not located within an area identified as being susceptible to flooding. Therefore, there would be no impact in this regard.

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?

No Impact

As described above in the response to **Checklist Question g)**, the project site is not located within an area identified as being susceptible to flooding or a City of Los Angeles Safety Element Inundation Zone, including flooding as a result of the failure of a levee or dam, or dam inundation. Therefore, there would be no impact in this regard. No mitigation measures or further evaluation are required.

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

No Impact

The proposed project site is not located near any large body of water. The nearest enclosed body of water is Stone Canyon Reservoir, which is approximately eight miles north of the proposed project. Therefore, there is no potential for a seiche to inundate the project site. Mudflows occur as a result of downslope movement of soil and/or rock under the influence of gravity. The site is relatively flat and there are no nearby slopes which could release mud or rock onto the project site, so there is no potential for a mudflow to affect the site. As described above in the response to **Checklist Question g)**, although the campus is located approximately 1.7 miles east of the Pacific Ocean, the project site is not located within a City of Los Angeles Safety Element Inundation Zone, including inundation by tsunami. Thus, there would be no impact in this regard.

130 FEMA, Flood Insurance Rate Map, Los Angeles County, California, Map Number 06037C1752F, Effective Date September 26, 2008

131 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

4.10.1 Summary of Impacts

The PEIR evaluated the potential for implementation of SUP-related projects to impact existing land uses in the LAUSD service area and conflict with applicable land use plans, policies and regulations, including habitat or wildlife conservation plans. New construction, modernization, repair, replacement, upgrade, remodeling, renovation and installation projects located on existing developed campuses would not divide established communities surrounding the schools.

Projects implemented under the SUP would provide school capacity in neighborhoods so that children in existing residential areas can attend schools within walking and/or bicycling distance of home. All SUP projects are required to meet California Code of Regulations Title 24 energy-efficiency standards. Therefore, site specific projects would be consistent with applicable goals of the Southern California Association of Governments (SCAG) 2012-2035 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), such as encouraging active/non-motorized transportation (such as bicycling and walking), and encouraging energy efficiency.

For avoiding impacts on existing land uses in areas where future projects would be implemented under the SUP, the PEIR requires site-specific projects to comply with applicable state regulations, including: (1) Education Code § 17251, (2) California Code of Regulations, Title 5, §§ 14001 through 14012, (3) California Education Code § 38131.b: Civic Center Act, and (4) California Coastal Act of 1976, PRC § 30000 et seq. No SCs would apply.

According to the PEIR, projects implemented under the SUP that include new construction and modernizations on existing school campuses would not conflict with applicable land use and conservation plans and regulations, would not physically divide an established community, and would have no impacts on existing land uses in the LAUSD region. Similarly, project-specific analysis provided in **Section 4.10.2** concludes that implementation of the Venice High School Comprehensive Modernization Project would have no impacts related to land use and planning.

4.10.2 Impacts Associated with the Proposed Project

4.10.2.1 Environmental Setting

The proposed project is located on the existing Venice High School campus, within the community of Venice, in the western part of the city and county of Los Angeles. The project is located within the Venice Community Plan Area.¹³² The Venice Community Plan designates 56 acres, or about three percent of the Plan area, to public or institutional uses, including schools. According to the Venice Community Plan, there is a continuing need for the modernizing of public facilities to improve services and accommodate changes in the Venice Community Plan.¹³³

The majority of the Venice Community Plan Area, approximately 85 percent, that extends from the Pacific Ocean to Lincoln Boulevard, lies within the California Coastal Zone and is thus subject to the

132 City of Los Angeles. 2000, Venice Community Plan. <http://planning.lacity.org/complan/pdf/vencptxt.pdf>. Adopted by the City Council on September 29, 2000.

133 Ibid.



provisions of the Coastal Act of 1976 and the Venice Local Coastal Program.¹³⁴ The project site is located approximately 0.3 mile east of Lincoln Boulevard, outside the area regulated by the Venice Local Coastal Program.

The project site is located in a densely developed urban area. The Venice High School campus is designated as Public Facilities Zone by the City of Los Angeles. The City's General Plan land use designations and zoning in the vicinity of the project are shown in **Figures 4.10-1**, General Plan Land Use Map and **4.10-2**, Zoning Map, respectively. Most of the areas immediately to the east, west and south of the campus are zoned as Single Family Residential. A large area near the east side of the campus and small areas to the north and west are designated for low, medium or high density Multi-family Residential land use. Small areas to the north and east of the campus are designated for commercial land use.

4.10.2.2 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 campus. 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.

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 project site is zoned PF (Public Facilities), and has a corresponding City of Los Angeles General Plan land use designation of Public Facilities. The PF zone allows the development of public elementary and secondary schools. As, 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. As discussed under **Section 4.10.1** above, as part of the SUP, all existing LAUSD schools are exempt from local jurisdiction zoning regulations.

According to the Venice Community Plan, there is a continuing need for the modernizing of public facilities (including schools) to improve services and accommodate changes in the Community Plan.¹³⁵ The proposed project would include modernizing, constructing, and renovating buildings and infrastructure within the existing Venice High School campus. Proposed new and updated buildings would be compatible with the general character, massing, and color of existing buildings (including the historic buildings) on campus and the surrounding neighborhood in terms of

134 City of Los Angeles. 1999, Venice Local Coastal Program/Land Use Plan.

<http://planning.lacity.org/complan/otrplan/pdf/venluptxt.pdf>. Adopted by the City Council on October 29, 1999.

135 City of Los Angeles. 2000, Venice Community Plan. <http://planning.lacity.org/complan/pdf/vencptxt.pdf>. Adopted by the City Council on September 29, 2000.



architectural style, density, height, bulk, and setback. Therefore, the proposed project would be consistent with the goals and policies of the Venice Community Plan that encourage expansion of existing school facilities prior to acquisition of new sites, and encourage compatibility between school locations, site layout and architectural design with adjacent land uses and community character.¹³⁶

Implementation of the proposed project would fulfill the educational needs of local communities as described in the PEIR, 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 project is located outside the Venice Coastal Zone and therefore is not required to comply with the requirements of the Venice Local Coastal Program.

The proposed project would not conflict with applicable land use plans, policies, or regulations and no impact would occur.

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

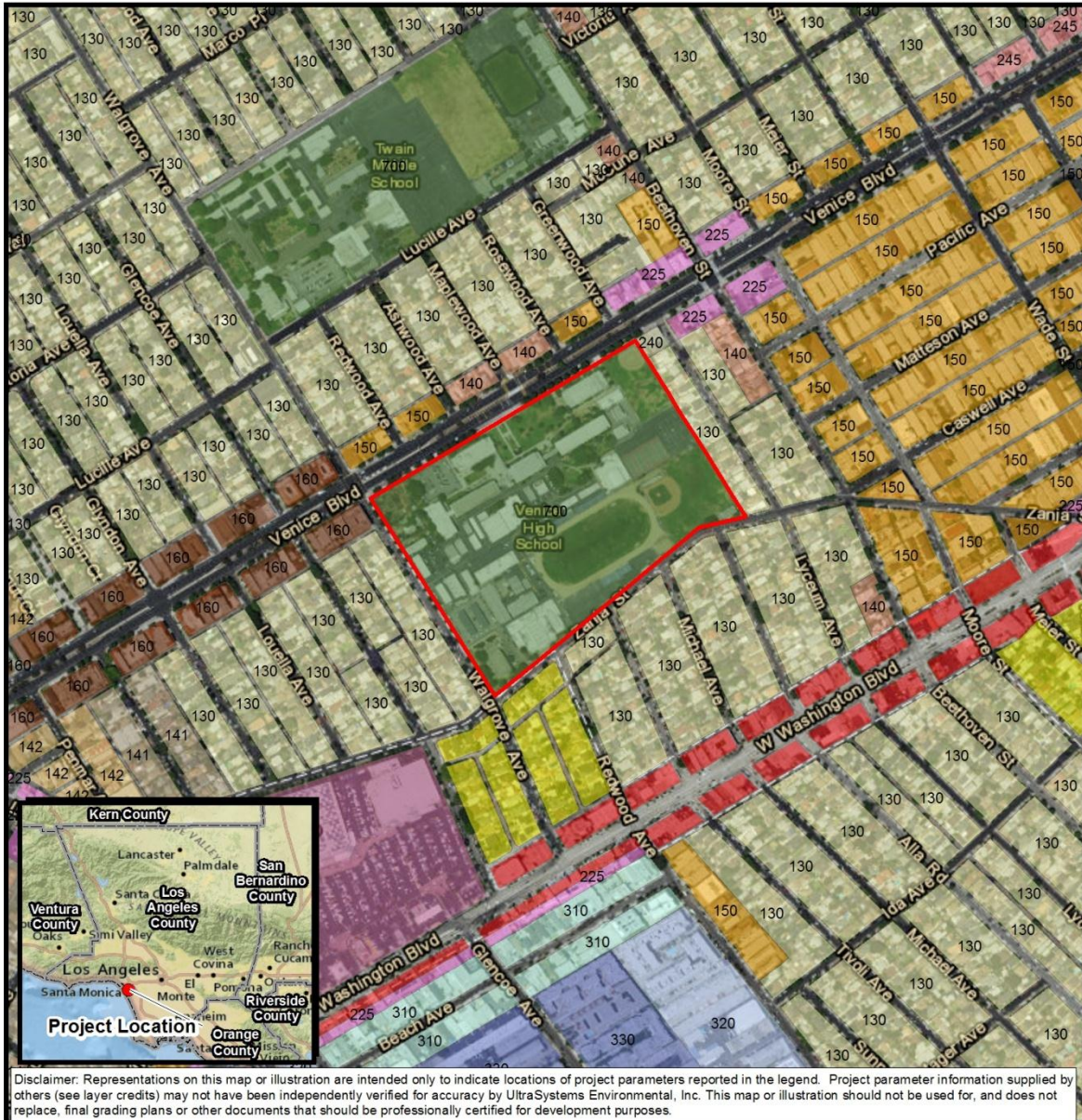
No Impact

The proposed project would be constructed entirely within the Venice 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. As previously noted, the campus is located approximately 0.3 mile east of Lincoln Boulevard, outside the area regulated by the Venice Local Coastal Program. 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.

136 Ibid.



**Figure 4.10-1
GENERAL PLAN LAND USE MAP**



Path: J:\Projects\6011_LAUSD_Venice\WXD\S\MND\6011_Venice_31_GP_LandUse_2016_08_24.mxd
 Service Layer Credits: Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AEX, Getmapping, Aerogrid, IGN, IGP, swisstopo, and the GIS User Community, Esri, HERE, DeLorme, MapmyIndia, © OpenStreetMap contributors, and the GIS user community. Content may not reflect National Geographic's current map policy. Sources: National Geographic, Esri, DeLorme, HERE, UNEP-WCMC, USGS, NASA, ESA, METI, NRCAN, GEBCO, NOAA, increment P Corp., LA County Assessor, 2015-2016, Culver City, 2010. LA City, 2015. UltraSystems Environmental, Inc., 2016

August 24, 2016

Legend

Venice High School Comprehensive Modernization Project

Culver City GP Land Uses:

- General Corridor
- Low Density Single Family
- Regional Center

City of Los Angeles GP Land Uses:

- 130 - Low Single Family Residential
- 141 - Low Medium I Multi-Family Residential
- 142 - Low Medium II Multi-Family Residential
- 140 - Low Medium Multi-Family Residential
- 150 - Medium Multi-Family Residential
- 160 - High Medium Residential
- 245 - Community Commercial
- 225 - General Commercial
- 240 - Neighborhood Office Commercial
- 310 - Commercial Manufacturing
- 320 - Light Manufacturing
- 330 - Limited Manufacturing
- 700 - Public Facilities

General Plan (GP) Land Uses

Scale 1:7,200

0 300 600 Feet

0 50 100 Meters

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**Figure 4.10-2
ZONING MAP**



Path: J:\Projects\6011_LAUSD_Venice\MXD\SIS_MND\6011_Venice_3_1_Zoning_2016_08_24.mxd
 August 24, 2016
 Service Layer Credits: Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AEX, Getmapping, Aerogrid, IGN, IGP, swisstopo, and the GIS User Community, Esri, HERE, DeLorme, MapmyIndia, © OpenStreetMap contributors, Esri, HERE, DeLorme, MapmyIndia, © OpenStreetMap contributors, and the GIS user community. Content may not reflect National Geographic's current map policy. Sources: National Geographic, Esri, DeLorme, HERE, UNEP-WCMC, USGS, NASA, ESA, METI, NRCAN, GEBCO, NOAA, increment P Corp.; LA County Assessor, 2015-2016; Culver City, 2010; LA City, 2015; UltraSystems Environmental, Inc., 2016

Legend

Scale 1:7,200

0 300 600 Feet

0 100 200 Meters

Venice High School Comprehensive Modernization Project

Venice High School Parcel Boundary

Culver City Zoning:

- Commercial General
- Commercial Regional Retail
- Residential Single Family

LA City Zoning:

- Commercial
- Multiple Residential
- Manufacturing
- Public Facilities
- Single Family Residential

Zoning



4.11 Mineral Resources

4.11.1 Summary of Impacts

The PEIR 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.¹³⁷ None of the designated mineral resource zones are located on or near an existing LAUSD school campus.

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

Project-specific analysis provided in **Section 4.11.2** concludes that implementation of the Venice High School Modernization Project would have no impacts on mineral resources in the project area.

4.11.2 Impacts Associated with the Proposed Project

4.11.2.1 Environmental Setting

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.^{138,139} 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,¹⁴⁰ as shown in **Figure 4.11-1**, Mineral Resources. Based on review of the Conservation Element of the Los Angeles General Plan and the Division of Oil, Gas and Thermal Resources mapping,¹⁴¹ the project site is not located within a known oil and gas field or in the vicinity of oil and gas wells, as shown in **Figure 4.11-2**, Oil and Gas Fields.

137 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.

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

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

140 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.

141 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.



4.11.2.2 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

The project is not located within an area designated as a mineral resource zone. As shown in **Figure 4.11-1** and **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, the project activities would be entirely carried out on the grounds of an existing school campus, and there are no mining sites located on existing LAUSD campuses. Therefore, no impact on mineral resources would occur.

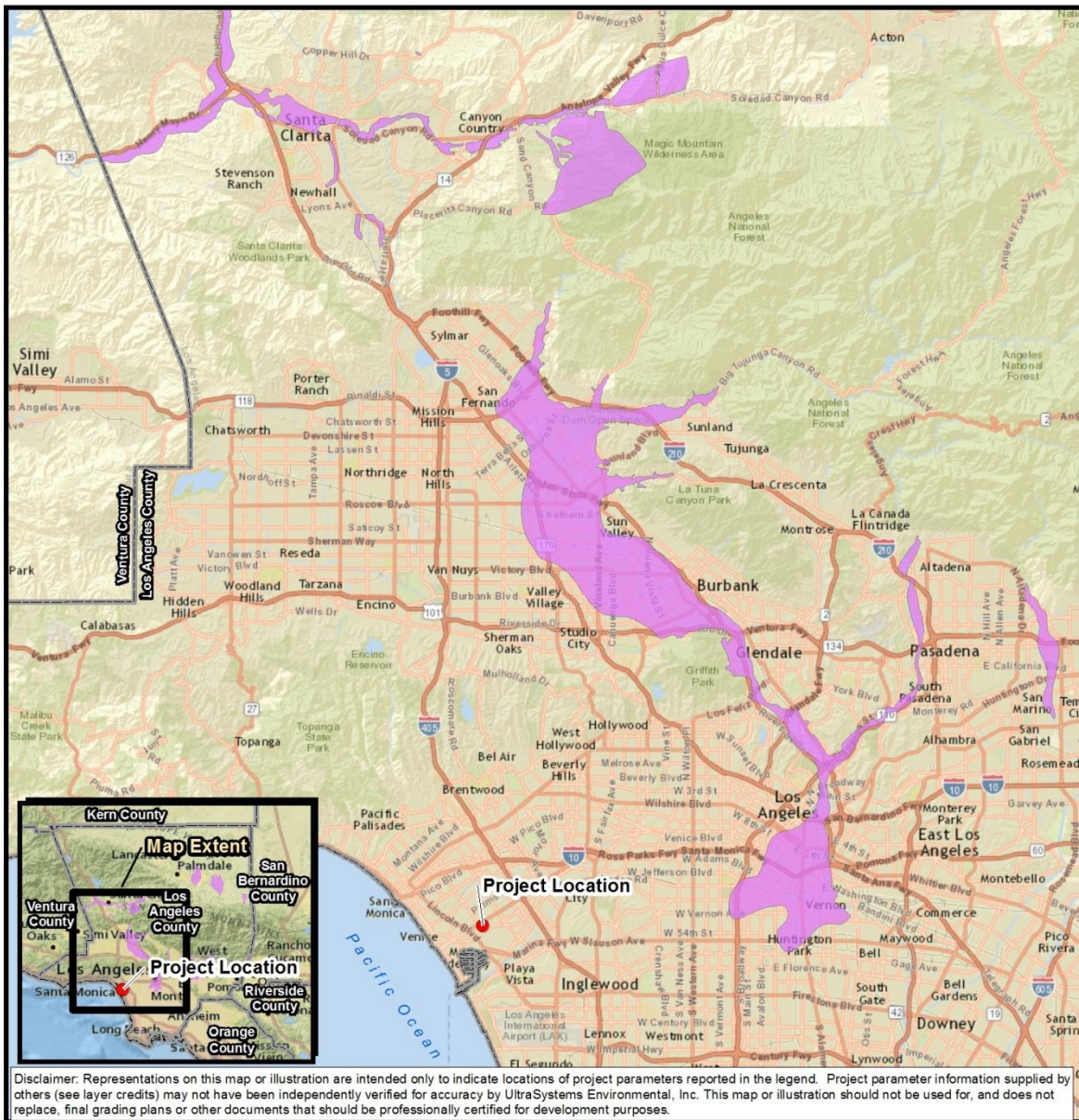
- b) **Would the project result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?**

No Impact

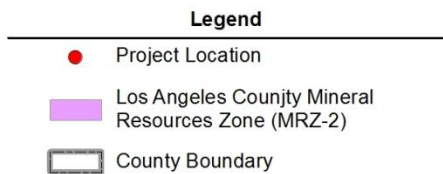
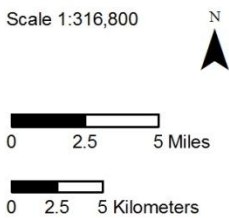
As discussed in the previous response to **Checklist Question 4.11 a)**, project activities would be entirely carried out on the grounds of an existing school campus. No mineral resource recovery sites are located on the existing campus, nor do mineral extraction operations occur on the campus. Therefore, 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.



**Figure 4.11-1
MINERAL RESOURCES**



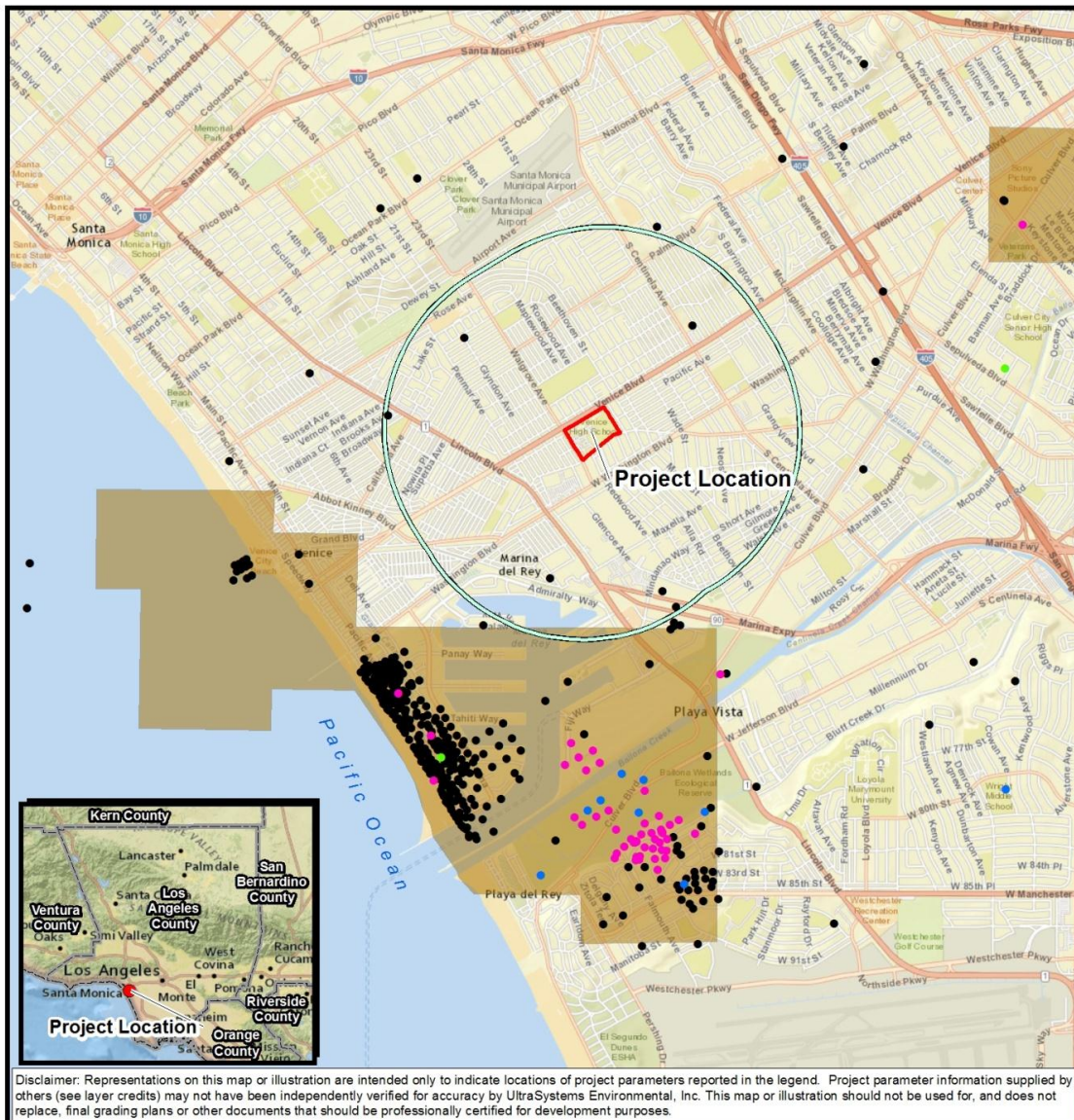
Path: J:\Projects\6011_LAUSD_Venice\MXD\IS\MND\6011_Venice_4.11_Mineral_Resources_2016_08_24.mxd August 24, 2016
 Service Layer Credits: Sources: Esri, HERE, DeLorme, USGS, Intermap, increment P Corp., NRCAN, Esri Japan, METI, Esri China (Hong Kong), Esri (Thailand), MapmyIndia, © OpenStreetMap contributors, and the GIS User Community, Content may not reflect National Geographic's current map policy. Sources: National Geographic, Esri, DeLorme, HERE, UNEP-WCMC, USGS, NASA, ESA, METI, NRCAN, GEBCO, NOAA, increment P Corp.; CA Dept. of Conservation, 1994; LA County Assessor, 2015-2016; UltraSystems Environmental, Inc., 2016



**Venice High School
Comprehensive
Modernization Project**
Mineral Resources



**Figure 4.11-2
OIL AND GAS FIELDS**



Path: J:\Projects\6011_LAUSD_Venice\MXDs\IS_MND\6011_Venice_4.6_Oil_and_Gas_Wells_2016_09_24.mxd
 Service Layer Credits: Sources: Esri, HERE, DeLorme, USGS, Intermop, increment P Corp., NRCAN, Esri Japan, METI, Esri China (Hong Kong), Esri (Thailand), MapmyIndia, © OpenStreetMap contributors, and the GIS User Community. Content may not reflect National Geographic's current map policy. Sources: National Geographic, Esri, DeLorme, HERE, UNEP-WCMC, USGS, NASA, ESA, METI, NRCAN, GEBCO, NOAA, increment P Corp.; LA County Assessor, 2015-2016; CA Dept. of Conservation, June/July 2016; UltraSystems Environmental, Inc., 2016

August 24, 2016

Venice High School Comprehensive Modernization Project

Oil and Gas Wells and Fields

Legend

- Venice High School Parcel Boundary
- 1-Mile Radius
- Oil and Gas Field Boundary
- Buried Well
- Idle Well
- New Well
- Plugged & Abandoned
- Unknown Well Status
- Active Well

Oil and Gas Well Status:

Scale 1:48,000

0 2,000 Feet

0 1,000 Meters

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4.12 Noise

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 D**). The PEIR 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 PEIR includes LAUSD Standard Conditions of Approval (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**, Noise and Vibration Standard Conditions of Approval and in **Section 7.0**. These include **SCs** for minimizing potential project-specific noise impacts.

**Table 4.12-1
NOISE AND VIBRATION STANDARD CONDITIONS OF APPROVAL**

Applicable SCs	Description
SC-N-2	<p>LAUSD shall analyze the acoustical environment of the site (such as traffic) and the characteristics of planned building components (such as heating, ventilation, and air conditioning [HVAC]), and design to achieve interior classroom noise levels of less than 55 dBA L₁₀ or 45 dBA L_{eq} with maximum (unoccupied) reverberation times of 0.6 seconds. Noise reduction methods shall include, 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.</p> <ul style="list-style-type: none"> • 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. • 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. <p>Existing HVAC units operating in excess of 50 dBA should be modified.</p>
SC-N-3	<p>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.</p>
SC-N-4	<p>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.</p> <p>Operational noise attenuation measures include, but are not limited to:</p> <ul style="list-style-type: none"> • buffer zones • berms • sound barriers:



Applicable SCs	Description
	<ul style="list-style-type: none"> • buildings • masonry walls • enclosed bleacher foot wells • other site-specific project design features.
SC-N-5	<p>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.</p>
SC-N-6	<p>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.</p>
SC-N-7	<p>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.</p>
SC-N-8	<p>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.</p> <ul style="list-style-type: none"> • Prior to construction activities, the construction contractor shall inspect and report on the current foundation and structural condition of the historic building. • The construction contractor shall implement alternative methods identified in the preconstruction meeting during demolition, excavation, and construction for work done within 25 feet of the historic building. • The construction contractor shall avoid use of vibratory rollers and packers adjacent to a historic building. • During demolition the construction contractor shall not phase any ground-impacting operations near a historic building to occur at the same time as any ground impacting operation associated with demolition and construction of a new building. <p>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.</p>
SC-N-9	<p>LAUSD shall prepare a noise assessment.</p> <p>If site-specific review of a school construction project identifies potentially significant adverse construction noise impacts, then LAUSD shall implement all feasible measures to reduce below applicable noise ordinances. Exterior construction noise levels exceed local noise standards, policies, or ordinances at noise-sensitive receptors. LAUSD shall mandate that construction bid contracts include the measures identified in the noise assessment. Specific noise reduction measures include, but are not limited to, the following:</p> <ul style="list-style-type: none"> • Source Controls • Time Constraints – prohibiting work during sensitive nighttime hours



Applicable SCs	Description
	<ul style="list-style-type: none"> • 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.

According to the PEIR, projects implemented under the SUP are anticipated to have less than significant and potentially significant impacts on the acoustic environment in the LAUSD region. The project specific analysis provided in **Section 4.12.2** concludes that implementation of the Venice High School Project would have either no impacts or less than significant impacts on the surrounding community.



4.12.2 Impacts Associated with the Proposed Project

4.12.2.1 Environmental Setting

Project-Specific Existing Conditions

The predominant source of noise in the area of Venice High School is motor vehicle traffic. Venice Boulevard, which forms the school's northern boundary, is a secondary/modified secondary highway,¹⁴² with average daily traffic of about 20,000 to 39,000 vehicles per day.¹⁴³

Venice High School is in the city of Los Angeles, as are most of the properties immediately surrounding the school. However, one block of the school boundary, on Zanja Street between Walgrove Avenue and Redwood Avenue is in the city of Culver City. The Noise Element of the City of Los Angeles General Plan deems the following land uses "noise sensitive":¹⁴⁴

- 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 Noise Element of the City of Culver City General Plan lists similar noise-sensitive land uses, omitting nature and wildlife preserves and parks, and adding office buildings and restaurants.¹⁴⁵

The principal existing offsite sensitive receivers nearest the project site are residential neighborhoods immediately on the northeast, southeast and southwest sides of the school, and across Venice Boulevard to the northwest. Mark Twain Middle School is about 840 feet to the north-northwest. **Table 4.12-2**, Nearest Existing Sensitive Receivers shows the distances to the nearest land uses normally considered to be noise-sensitive. Sensitive receivers within 0.25 mile of Venice High School are shown in **Figure 4.12-1**, Sensitive Receivers Near Venice High School.

¹⁴² City of Los Angeles 2010 Bicycle Plan. First Year of the First Five-Year Implementation Strategy and Figueroa Streetscape Project. Draft Environmental Impact Report. City of Los Angeles, p. 4.5-3, <http://planning.lacity.org/EIR/BicyclePlan/DEIR/4.5%20Transportation%20%20Traffic.pdf>. Accessed December 16, 2016.

¹⁴³ Traffic Counts Conducted by LADOT's Traffic Survey Section. 10 Year Summary, 2001-2010. http://ladot.lacity.org/sites/g/files/wph266/f/LACITYP_023705.xls. Accessed December 16, 2016. Additional information is in Section 4.17.

¹⁴⁴ 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.

¹⁴⁵ City of Culver City. General Plan. Noise Element. Adopted July 22, 1996. P. N-16. Internet URL: <http://www.culvercity.org/home/showdocument?id=778>.



**Table 4.12-2
NEAREST EXISTING SENSITIVE RECEIVERS**

	Sensitive Receiver Name	Type	Location	Distance from Proposed Project^a (Feet)
1	Private Residence	Single-Family Dwelling	3904 Tivoli Avenue Los Angeles, CA 90066 Latitude: 33.995816 Longitude: -118.442412	562
2	Yo San University of Traditional Chinese Medicine	School (Private University)	13315 West Washington Boulevard Los Angeles, CA 90066 Latitude: 33.9929 Longitude: -118.442947	787
3	Private Residence	Single-Family Dwelling	2469 Walgrove Avenue Los Angeles, CA 90066 Latitude: 33.99539 Longitude: -118.445187	807
4	Mark Twain Middle School	School (Public Middle School)	2224 Walgrove Avenue Los Angeles, CA 90066 Latitude: 33.99947 Longitude: -118.44792	850
5	Venice Baptist Church	House of Worship	2241 Walgrove Avenue Los Angeles, CA 90066 Latitude: 33.9988889 Longitude: -118.4480556	870
6	Upward Bound House – Family Shelter	Shelter	12841 West Washington Boulevard Culver City, CA 90066 Latitude: 33.99561084 Longitude: -118.438108	915
7	Beethoven Street Elementary School	School (Public Elementary School)	3711 Beethoven Street Los Angeles, CA 90066 Latitude: 34.00216 Longitude: -118.44331	1,179

Source: UltraSystems and Google Earth Pro. 2016.

^aDistances from center of school site.

Figure 4.12-1
SENSITIVE RECEIVERS NEAR VENICE HIGH SCHOOL



Disclaimer: Representations on this map or illustration are intended only to indicate locations of project parameters reported in the legend. Project parameter information supplied by others (see layer credits) may not have been independently verified for accuracy by UltraSystems Environmental, Inc. This map or illustration should not be used for, and does not replace, final grading plans or other documents that should be professionally certified for development purposes.

Path: J:\Projects\6011_LAUDS_Venice\MXD\GIS_MND\6011_Venice_4.12_Sensitive_Receiver_2016_12_19.mxd
 Service Layer Credits: Esri, HERE, DeLorme, MapmyIndia, © OpenStreetMap contributors, Esri, HERE, DeLorme, MapmyIndia, © OpenStreetMap contributors, and the GIS user community. Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community. Content may not reflect National Geographic's current map policy. Sources: National Geographic, Esri, DeLorme, HERE, UNEP-WCMC, USGS, NASA, ESA, METI, NRCAN, GEBCO, NOAA, increment P Corp., LA County Assessor, 2015-2016; LA County DPW, 2013; UltraSystems Environmental, Inc., 2016

August 24, 2016

Scale 1:8,400	N	Legend	
		Venice High School Parcel Boundary	Care Facility
		Quarter-Mile Radius	House of Worship
			School
			Shelter
			Single-family Dwelling

Venice High School Comprehensive Modernization Project

Sensitive Receivers



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 in **Section 4.12.2.2**.

On Wednesday, October 19, 2016, UltraSystems conducted ambient noise sampling at 11 locations on campus and in the general project area. **Table 4.12-3**, Characteristics of Ambient Noise Measurement Locations lists the measurement points and why the sites were chosen. Measurement locations are shown in **Figure 4.12-2**, Ambient Noise Monitoring Sites for Venice High School. The sampling locations were chosen to provide ambient noise data to compare with the results of construction noise estimates. (See **Section 4.12.2**.) 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 **Appendix D**.

Table 4.12-3
CHARACTERISTICS OF AMBIENT NOISE MEASUREMENT LOCATIONS

Point	Sampling Location	Date	Time Interval	Purpose of Selection
1	1620 Venice Boulevard (Residential Area)	10/19/2016 Wednesday	0930-0945	Nearest residential area west of the project site
2	2449 Walgrove Avenue (Residential Area)	10/19/2016 Wednesday	0952-1007	Nearest residential area southwest of the project site
3	13341 Zanja Street (Residential Area)	10/19/2016 Wednesday	1013-1028	Nearest residential area south of the project site
4	13204 Zanja Street (Residential Area)	10/19/2016 Wednesday	1035-1050	Nearest residential area southeast of the project site
5	On Venice HS Campus (behind the main office)	10/19/2016 Wednesday	1141-1156	Nearest building to future construction
6	On Venice HS Campus (in front of the gym)	10/19/2016 Wednesday	1202-1217	Additional building near to construction
7	On Venice HS Campus (behind the cafeteria)	10/19/2016 Wednesday	1243-1258	Additional building near to construction
8	13103 Venice Boulevard (Residential Area)	10/19/2016 Wednesday	1321-1336	Nearest residential area northwest of the project site
9	3891 Lyceum Avenue (Residential Area)	10/19/2016 Wednesday	1345-1400	Nearest residential area east of the project site
10	3849 Lyceum Avenue (Residential Area)	10/19/2016 Wednesday	1406-1421	Nearest residential area northeast of the project site
11	3815 Lyceum Avenue (Residential Area)	10/19/2016 Wednesday	1426-1441	Nearest residential area north of the project site

**Figure 4.12-2
AMBIENT NOISE MONITORING SITES FOR VENICE HIGH SCHOOL**



Path: J:\Projects\6011_LAUSD_Venice\MXD\IS_MND\6011_Venice_4.12_Noise_Monitoring_2016_08_24.mxd
 Service Layer Credits: Esri, HERE, DeLorme, MapmyIndia, © OpenStreetMap contributors, Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community, Content may not reflect National Geographic's current map policy. Sources: National Geographic, Esri, DeLorme, HERE, UNEP-WCMC, USGS, NASA, ESA, METI, NRCAN, GEBCO, NOAA, increment P Corp., LA County Assessor, 2015-2016, UltraSystems Environmental, Inc., 2016

Scale 1:7,200

N

0 300 600 Feet

0 100 200 Meters

Legend

- Noise Monitoring Location
- Venice High School Parcel Boundary

**Venice High School
Comprehensive
Modernization Project**

Ambient Noise
Measurement Locations





Table 4.12-4, Measured Ambient Noise Levels shows the results of the ambient noise sampling. Ambient noise levels (L_{eq}) for the 11 sampling points ranged from 48.4 to 76.8 dBA and averaged (L_{eq}) 67.8 dBA. L_{90} values averaged 53.2 dBA. The highest average noise levels were at measurement point 8, which is near the heavily traveled Venice Boulevard, which has three lanes traveling in each direction. For most of the ambient monitoring locations, the difference between the L_{eq} and L_{90} values ranged from 1.6 to 21.0 dBA. Since the L_{90} is a measure of general “background” noise, it is likely that Venice Boulevard is an important noise contributor on the northern side of the project area. The three ambient monitoring locations on campus (measurement points 5 through 7) yielded the lowest differences between the L_{eq} and L_{90} values.

**Table 4.12-4
MEASURED AMBIENT NOISE LEVELS**

Point	Measurement Results (dBA)		
	15-Minute L_{eq}	L_{max}^{146}	L_{90}
1	67.6	79.7	58.4
2	66.3	79.6	55.1
3	66.0	80.9	56.4
4	58.7	75.3	48.2
5	54.2	70.8	49.1
6	48.4	55.4	46.8
7	58.7	85.3	48.8
8	76.8	102.3	55.8
9	59.2	79.0	46.7
10	56.2	70.6	45.4
11	59.4	80.3	49.7

Project-Specific Regulations

Section 5.12 of the PEIR describes in considerable detail the laws, regulations and policies of the federal government, the State of California, and the City of Los Angeles¹⁴⁷ 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 Venice High School comprehensive modernization project.

Federal

Because Venice High School is surrounded on three 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 L_{dn} as a desirable maximum interior standard for residential units developed under HUD funding (HUD, 1985) is pertinent. While HUD does not specify acceptable exterior noise levels, standard construction of residential dwellings constructed under Title 24 of the California Code of

146 No observations that would explain the notably high L_{max} value at noise monitoring location 8 were recorded. The measurement location was on Venice Boulevard.

147 Because Venice 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.



Regulations typically provides 20 dBA of acoustical attenuation with the windows closed and 10 dBA with the windows open. Based on this assumption, the exterior L_{dn} or CNEL should not 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 (OPR, 2003).¹⁴⁸ 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.¹⁴⁹ For the single-family houses immediately surrounding Venice 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 PEIR, 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.¹⁵⁰

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

148 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.

149 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>.

150 City of Los Angeles Municipal Code. § 41.40(b).



construction equipment exceed that 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.¹⁵¹ It is assumed that all existing regulations for the 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,¹⁵² 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.

151 This discussion takes City of Culver City regulations into account because some residences south of the intersection of Walgrove Avenue and Zanja Street are near enough to the campus to potentially be affected by construction noise, but are in Culver City. The Culver City Noise Element has established exterior sound level design standards of 65 dBA CNEL and 75 dBA CNEL for residential and commercial land use types, respectively. The Culver City Municipal Code prohibits noise-generating construction activities outside the hours of 8:00 a.m. to 8 p.m., on Mondays through Fridays; 9:00 a.m. to 7:00 p.m. on Saturdays; and 10:00 a.m. to 7:00 p.m. on Sundays. References: Culver City General Plan, Noise Element. Culver City, (Approved July 22 1996) and "The Municipal Code of the City of Culver City, California" (passed July 11, 2011), § 9.07.035.

152 PEIR, p. 5.12-25.



- 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.

**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						



Land Use Category	Noise Exposure (dBA, CNEL)					
	55	60	65	70	75	80
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.

Impact Analysis

The following analyses are provided in detail in the noise technical study for the proposed project, which is in **Appendix D**.

- 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 proposed project will replace or upgrade facilities on the campus of Venice High School, but it will not increase the number of students or faculty at the school, and, with one exception, will not introduce major new on-site noise sources or bring existing noise sources closer to sensitive receivers. The exception is that a new parking lot is proposed for the northeast corner of the campus, near the back yards of single-family residences on Lyceum Avenue. Residents are currently exposed to noise from athletic activities on the existing softball field. After project



construction, passenger vehicles will drive on the new lot at morning and afternoon peak hours and, to a lesser extent, during the school day. According to an analysis presented in **Appendix D**, the increase in noise exposure from parking activities would be about 0.5 dBA, which would not be noticeable. Therefore, there will be no change in exposure to the community and the impact will be less than significant.

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 PEIR, school operations do not involve sources that cause substantial ground-borne vibration. Therefore, the modernization project at Venice High School 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. If use of piles 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. Similarly, if construction activities are proposed to occur within 25 feet of an historic building, then LAUSD and the construction contractor would implement **SC-N-8** to ensure that no vibration damage occurs. 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 Venice High School, but it would not increase the number of students or faculty at Venice 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.

For offsite, on road noise impacts to be significant, it is generally necessary for traffic to double.¹⁵³ As stated in the traffic study for the Venice High School Comprehensive Modernization Project, 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.¹⁵⁴ 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?

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

154 Draft Traffic Study. Venice High School Modernization. Transpo Group, Inc., Santa Ana, California for UltraSystems Environmental, Inc., Irvine, California. January, 2017.



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 the construction of the proposed project would begin in 2018 and finish in 2020.

Using preliminary design and scheduling information from LAUSD,¹⁵⁵ UltraSystems used the air pollutant emissions estimation model CalEEMod, Version 2016.3.1 (California Air Pollution Control Officers Association, 2016) 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 CalEEMod and UltraSystems’ experience with similar projects. The CalEEMod equipment mix is based on a construction survey performed by the South Coast Air Quality Management District (SCAQMD) (California Air Pollution Control Officers Association, 2016). **Table 4.12-6**, Construction Equipment Noise Characteristics 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.¹⁵⁶ 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	0.48	81
Concrete/Industrial Saw	81	0.2	90
Crane	231	0.29	83
Excavator	158	0.4	80
Forklift	89	0.2	67
Generator Set	84	0.5	73

155 Email from Eimon Smith, Los Angeles Unified School District, Los Angeles, CA to Betsy Lindsay and Michael Rogozen, UltraSystems Environmental, Inc., Irvine, CA. November 18, 2016.

156 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.



Equipment Type	Horsepower	Usage Factor	Maximum Sound Level (dBA @ 50 feet)
Grader	187	0.41	85
Paver	130	0.5	77
Paving Equipment	132	0.5	85
Roller	80	0.2	80
Rubber Tired Dozer	247	0.4	79
Scraper	367	0.4	84
Tractor/Loader/Backhoe	97	0.37	85
Welder	46	0.45	74

Because a final design concept had not been chosen yet, the three schematic designs under consideration¹⁵⁷ were reviewed to identify construction scenarios that had the highest potential for affecting neighborhood sensitive receivers, i.e., those with the greatest concentration of construction activity near the receivers. It was posited that the southwest portion of the campus, which would have both major demolition and construction, met that criterion.

According to the schedule developed for the CalEEMod analysis, the project would have ten unique combinations of construction phases, all of which could reasonably be expected to occur in the aforementioned southwest area of the campus. The impact analysis focused on two residential sensitive receivers in the area, which are identified as receivers 1 and 3 in **Table 4.12-2** and shown in **Figure 4.12-1**. These residences correspond approximately to ambient noise sampling points 4 and 2, respectively. Distances between each construction activity and each sensitive receiver were determined by GIS analysis.

Table 4.12-7, Construction Noise Exposures at Two Sensitive Receivers shows the calculated one-hour average noise exposure (L_{eq}) at each receiver during each of the ten construction phase combinations. The highest exposures (about 81 and 87 dBA L_{eq}) would occur during street paving during the final weeks of construction. The reason for the high exposures is that the residences are assumed to be on the streets to be paved. These results represent a worst case, since paving will comprise a small fraction of the activity for this construction phase, and will occur entirely on the side of the street across from the residences. In any event, since street paving is a common activity that occurs irrespective of school construction projects, the noise exposure therefrom was not included in the significance analysis.

157 Los Angeles Unified School District. Venice High School Comprehensive Modernization Project. Preliminary Schematic Design. gkkworks, Irvine, California. September 27, 2016.



Table 4.12-7
CONSTRUCTION NOISE EXPOSURES AT TWO SENSITIVE RECEIVERS

Construction Phase Combination	Hourly Exposure (dBA L _{eq})	
	Tivoli Residence	Walgrove Residence
Demolition	67.7	67.8
Site Preparation	69.3	69.4
Grading	70.2	70.2
Grading + Construction	71.7	71.9
Demolition + Construction	70.1	70.5
Site Preparation + Construction	71.1	71.4
Architectural Coating + Construction	68.6	69.6
Onsite Paving + Construction	69.8	73.5
Offsite (Street) Paving + Construction	86.7	81.0
Architectural Coating	59.7	59.7

The next highest exposures would be 71.7 dBA L_{eq} at the Tivoli residence during the combination of grading and construction, and 73.5 dBA L_{eq} at the Walgrove residence during the combination of onsite paving and construction. For the Tivoli and Walgrove residences, the increase over the measured ambient levels would be 13.2 and 8.0 dBA L_{eq}, respectively. These increases in unmitigated noise exposure would normally be considered significant. However, the construction noise measures enumerated in **SC-N-9** will be able to reduce exposures to a less than significant level. These measures will be incorporated in the design build contract for the proposed project. Those having particular utility for the exposures near the southwestern portion of 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.

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 Santa Monica Municipal Airport is located just over one mile to the north of Venice High School (see **Figure 4.8-1**, Airport Influence Area). However, the project site is not located in the airport influence area for Santa Monica Municipal Airport (ALUC 2003). Per Education Code § 17215, the District must receive approval from the CDE and California Department of Transportation before



acquiring title to property for a new school site if the proposed site is within 2 nautical miles of an airport runway. However, Education Code § 17215 does not apply to school sites acquired prior to January 1, 1966, nor to any additions or extensions to those sites. Venice High School is an existing campus acquired prior to January 1, 1966. 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. There is a heliport located just under one mile southwest of the project site. Venice High School is an existing campus; therefore, the proposed project would not create any new noise exposures associated with heliport operations, and no impact would occur in this regard.



4.13 Pedestrian Safety

4.13.1 Summary of Impacts

The PEIR evaluated the potential for SUP-related projects to impact pedestrian safety. Most of LAUSD’s campuses and Venice High School specifically, are located in urban areas with established street systems that provide access to the school sites. Vehicular and pedestrian access to Venice High School is provided via Venice Boulevard, Zanja Street, Walgrove Avenue, and Lyceum Avenue. These access routes for vehicles and pedestrians will not change as a result of the comprehensive modernization project at Venice High School. The project-specific traffic study includes a pedestrian access analysis¹⁵⁸ (See **Appendix E**).

The PEIR includes **SCs** for minimizing impacts on pedestrian safety in areas where future projects would be implemented under the SUP. Applicable **SCs** related to pedestrian safety for the project are provided in **Table 4.13-1**, Pedestrian Safety Standard Conditions of Approval and **Section 7.0**.

Table 4.13-1
PEDESTRIAN SAFETY STANDARD CONDITIONS OF APPROVAL

Applicable SCs	Description
SC-PED-5	<p>School Design Guide. The Guide states student drop-off and pick-up, bus loading areas, and parking areas shall be separated to allow students to enter and exit the school grounds safely.</p>

According to the PEIR, projects implemented under the SUP are anticipated to have less than significant impacts on pedestrian safety in the LAUSD region. Similarly, project-specific analysis provided in **Section 4.13.2** concludes that implementation of the Venice High School Comprehensive Modernization Project would have less than significant impacts on pedestrian safety.

4.13.2 Impacts Associated with the Proposed Project

4.13.2.1 Environmental Setting

The proposed project is located on the Venice High School Campus, within the community of Venice, a densely-developed area in the western part of the city of Los Angeles. The campus is served by public transit (buses) with established routes. Most of the areas located immediately to the east, west and south of the campus are primarily zoned as single family residential. An area near the east side of the campus and areas to the north and west are designated for low, medium or high density multi-family residential land uses. Areas to the north and east of the campus are designated for commercial land use.

The campus is bounded by Venice Boulevard to the north, Zanja Street to the south, Walgrove Avenue to the west, and Lyceum Avenue to the east. Vehicular and pedestrian access to Venice High

158 Traffic Study Venice High School Modernization, Transpo Group January 2017



School is provided via Venice Boulevard, Zanja Street, Walgrove Avenue and Lyceum Avenue. These access routes will not change as a result of the modernization project at Venice High School.

The Project would move an existing open parking lot from the southwest portion of the campus off Venice Boulevard (near the intersection of Walgrove Avenue and Venice Boulevard) to the northern portion of the campus off Venice Boulevard. This space is currently a softball field. Vehicular access and parking will be designed to comply with **Section 2.3**, Vehicular Access and Parking of the School Design Guide. 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 located immediately adjacent to the campus for repair, creation, extension, or modifications of driveways and existing sidewalks.

4.13.2.2 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 would not increase the capacity of Venice High School, nor would it result in increased enrollment at the school. As described in **Section 3.0**, the project would improve vehicular and pedestrian access to the site by eliminating faculty and staff parking along the existing fire access/service road bisecting the campus. While the proposed project would retain this road, the road would be restricted to pedestrian travel during school hours (except in emergencies). The designated main entrance for the school is Venice Boulevard, which has a curb cut and student pick-up and drop-off areas. Under the project, the curb cut may be extended; however, the existing drop-off/pick-up area will remain. Walgrove Avenue is also used by pedestrians to access the campus. A parking lot that is currently located on the northwestern portion of the campus immediately off Venice Boulevard would be relocated to the northeastern portion of the campus off Venice Boulevard. These changes to vehicular and pedestrian access to the campus will have a less than significant impacts on pedestrians.

In addition, projects are required to provide for emergency vehicle access, as required by the City of Los Angeles Fire Department (LAFD), and conformance to local ordinances to ensure that adequate access would be maintained.

The proposed project at Venice High School will not increase the number of students at the school, nor will it add additional uses at the school. Therefore, the proposed project will not generate permanent additional traffic in the vicinity of the school. In addition, pedestrian access to Venice High School will continue to be provided via Venice Boulevard, Zanja Street, Walgrove Avenue, and Lyceum Avenue during construction and after the modernization project is complete.

Implementation of **SC-PED-5** and LAFD requirements would ensure that project impacts would be reduced to less than significant. The project as designed would enhance pedestrian safety. Impacts with respect to vehicular and/or pedestrian safety hazards would be less than significant.

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



No Impact

The proposed project would occur on the existing Venice High School campus. Project operation would not be expected to generate additional trips. Currently, pedestrians accessing the campus via Venice Boulevard, Zanja Street, Walgrove Avenue, and Lyceum Avenue, and these routes will continue to be used during construction and after the modernization project is complete. The anticipated construction and new campus design may alter the orientation or location of certain campus features such as the parking lots; however, the recommended and primarily pedestrian access routes to the campus will remain unchanged. Therefore, the proposed project would not create an unsafe route to school, and there would be no impacts to students walking from local neighborhoods.

- 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 the existing Venice High School campus. The campus frontage is located on Venice Boulevard. Students currently walk and bike to the existing school campus, and safety devices, such as crosswalks, traffic lights, and signage, are in place to protect students accessing the campus. As discussed in the responses for **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 at Venice High School would not pose a new safety hazard, as compared to current conditions. No impact would occur.



4.14 Population and Housing

4.14.1 Summary of Impacts

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

The PEIR 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. As the proposed project includes renovation and modernization of an existing school campus, located entirely within the boundary of the existing Venice High School campus, no property acquisition would be required. Therefore, the **SC** related to displacement of properties is not applicable to the proposed project.

According to the PEIR, new construction, renovation and modernization projects implemented under the SUP on existing LAUSD campuses are anticipated to have less than significant impacts related to indirect population growth and no impacts related to displacement of housing and people in the LAUSD region. Similarly, the project-specific analysis provided in **Section 4.14.2** concludes that implementation of the Venice High School Modernization 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 Impacts Associated with the Proposed Project

4.14.2.1 Environmental Setting

The 2010 population within the LAUSD boundaries was 4,579,411, slightly less than half the 9,818,605 population of Los Angeles County.¹⁵⁹ The 2010 population within the Community of Venice was 46,198, approximately one percent of the total population in the LAUSD area. The 2010 total number of households in Venice was 21,955, approximately 1.3 percent of the 1,645,648 households in the LAUSD area.^{160,161} Between 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.¹⁶²

4.14.2.2 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)?**

159 LAUSD OEHS. "School Upgrade Program Final Environmental Impact Report." <http://achieve.lausd.net/ceqa>. Adopted by the Board of Education on November 10, 2015.

160 City of Los Angeles. Venice Community Plan. <http://planning.lacity.org/complan/pdf/vencptxt.pdf>. Accessed October 2016.

161 LAUSD OEHS. "School Upgrade Program Final Environmental Impact Report." <http://achieve.lausd.net/ceqa>. Adopted by the Board of Education on November 10, 2015.

162 LAUSD OEHS. "School Upgrade Program Final Environmental Impact Report." <http://achieve.lausd.net/ceqa>. Adopted by the Board of Education on November 10, 2015.



Less Than Significant Impact

The proposed project would include modernizing, constructing, and renovating buildings and infrastructure within the Venice High School campus. The project would not increase student capacity at Venice High School 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 on-site 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 are 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 off-site 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.

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 Venice 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 on-site 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.

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.



4.15 Public Services

4.15.1 Summary of Impacts

The PEIR evaluated the potential for implementation of SUP-related projects to impact public services in the LAUSD region. Proposed new construction projects under the SUP could lead to an expansion of existing school campuses or increase in total building area or changes in access, circulation and site plans, thereby generating increased demands for fire and police protection services.

The PEIR includes **SCs** for minimizing impacts on fire protection, emergency 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**, Public Services Standard Conditions of Approval and **Section 7.0**.

**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.

According to the PEIR, projects implemented under the SUP are anticipated to have less than significant impacts on fire protection, emergency and police protection services, and no impacts on existing public facilities such as schools, parks and libraries in the LAUSD region. Similarly, a project-specific analysis, provided in **Section 4.15.2**, concludes that implementation of the Venice High School Modernization Project would also have less than significant impacts on fire protection, emergency, police protection, and park services and no impacts on existing public facilities, such as schools and libraries in the project area.

4.15.2 Impacts Associated with the Proposed Project

4.15.2.1 Environmental Setting

Fire Protection

The Los Angeles Fire Department (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 63, located at 1930 Shell Avenue, approximately one mile west of the project site. Other LAFD fire stations near the project site include Fire Station 62, located at 11970 Venice Boulevard, approximately two miles away; and Fire Station 67, located at 5451 Playa Vista Drive, approximately three miles from the project site. The LAFD’s Schools, Churches and Institutions Units are responsible for the



inspection of all 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.¹⁶³

Police Protection

The Los Angeles School Police Department (LASPD) is the primary provider of police protection to LAUSD schools, providing security to schools within LASPD'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.¹⁶⁴ LASPD's West division office is located on the Venice High School Campus.

The Los Angeles Police Department (LAPD) would be the secondary providers of law enforcement services within the project area and would supplement LASPD. The West Bureau's Pacific Division Police Station is located at 12312 Culver Boulevard, approximately 2.2 miles from the project site.¹⁶⁵ LASPD maintains a cooperative working relationship with the LAPD.

Parks

The City of Los Angeles Department of Recreation and Parks operates public parks and recreational facilities in the Venice community. There are eight small parks, three neighborhood parks, two community parks, and two regional parks in the Venice Community Plan area, with a total area of approximately 254 acres.¹⁶⁶ The nearest recreational facility is the Venice Pool community facility located within the Venice High School Campus. The project site is not located within 0.25 mile of any other public parks or recreational facilities serving the community of Venice. In accordance with the California Education Code and Board of Education rules, public school facilities, including sports and recreational facilities on public school campuses (i.e., Venice High School) are available for use by the public. Organized groups may also apply to the LAUSD for use of sports and recreational facilities on public school campuses.

Other Public Facilities

The LAUSD is served by two library systems: the Los Angeles City Public Library (LAPL) and the County of Los Angeles Public Library (CLAPL). The LAPL provides library services within the community of Venice. The LAPL has 72 branch libraries, including the Central Library in downtown Los Angeles. Its collection consists of over six million books, audiobooks, periodicals, DVDs, and CDs.¹⁶⁷ The community of Venice is served primarily by the Venice-Abbot Kinney Memorial Branch Library located at 501 South Venice Boulevard, approximately 1.5 miles west of the project site. Other libraries serving different parts of the community include the Mar Vista Branch Library, located in the Palms-Mar Vista area; and the West Los Angeles Regional Library.¹⁶⁸ No CLAPL

163 Los Angeles Fire Department. <http://www.lafd.org/fire-prevention/schools-churches-institutions>. Accessed October 2016.

164 Los Angeles Unified School District, Los Angeles School Police Department. <http://achieve.lausd.net/Page/8851>. Accessed October 2016.

165 Los Angeles Police Department. http://lapdonline.org/pacific_community_police_station. Accessed October 2016.

166 City of Los Angeles. 2000, Venice Community Plan. <http://planning.lacity.org/complan/pdf/vencptxt.pdf>. Adopted by the City Council on September 29, 2000.

167 LAUSD School Upgrade Program, Final Environmental Impact Report, Section 5.15 Public Services.

168 City of Los Angeles, Venice Community Plan. Internet URL: <http://planning.lacity.org/complan/pdf/vencptxt.pdf>. Accessed October 2016



branch libraries are located within the community of Venice. The closest CLAPL branch library to the Venice High School campus is the Lloyd Taber-Marina del Rey Library, located at 4533 Admiralty Way in Marina del Rey.

The community of Venice is well served by a range of medical facilities, including hospitals, medical centers, urgent care facilities, and nursing facilities. The closest hospital providing general acute medical services and 24/7 emergency care is the Marina Del Rey Hospital, located at 4650 Lincoln Boulevard, approximately 1.5 miles south of the Venice High School campus.

The city of Los Angeles is served by 61 United States Postal Service (USPS) office locations.¹⁶⁹ The USPS post office providing service to Venice High School is at 3826 Grand View Boulevard, in Mar Vista, approximately 1.3 miles east of the project site. The nearest post office is the Marina Del Rey post office located at 4325 Glencoe Avenue, approximately one mile south of the Venice High School campus.

4.15.2.2 Impact Analysis

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:

a) Fire Protection?

Less than Significant Impact

Construction of the project may result in a temporary increase in demand for fire protection and emergency medical services related specifically to construction workers during onsite construction activities. However, through the use of appropriate construction safety barriers, notices and construction warning signage, students, teachers/staff and visitors to Venice High School during the construction period will be advised of the additional safety procedures implemented during construction.

The project would not result in an increase in enrollment within LAUSD or at Venice High School. Furthermore, overall LAUSD enrollment is forecast to decrease by 2.2 percent over the next ten years.¹⁷⁰ Therefore, implementation of the proposed project would not generate increased demands for fire protection and emergency services due to a significant increase in students or staff at the school. As LAFD is already serving 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, fire hydrant pressure and accessibility for firefighting equipment to minimize any 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**.

¹⁶⁹ <http://postofficefinder.org/ca/los-angeles/los-angeles/>. Accessed March 2017.

¹⁷⁰ Ibid.



Additionally, LAUSD has emergency procedures in place to ensure the safety of people on and around schools as outlined in **SC-PS-2**.¹⁷¹

Compliance with applicable state, City and LAUSD requirements, including implementation of Standard Conditions **SC-PS-1** and **SC-PS-2**, would ensure that no new or expanded fire protection services would be required. Impacts on fire protection services would be less than significant.

b) Police Protection?

Less than Significant Impact

Demands for police protection are generated more by an increase in the population within a service area than by the number of buildings or total building area. Implementation of the proposed project would not increase the school capacity at Venice High School. Furthermore, overall LAUSD enrollment is forecast to decrease by 2.2 percent over the next 10 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 local police departments to ensure safety and access as outlined in **SC-PS-1**. Additionally, LAUSD has appropriate emergency procedures in place to ensure the safety of people on and around schools as outlined in **SC-PS-2**.¹⁷²

Implementation of **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.

c) Schools?

No Impact

Implementation of the proposed project would be limited to improvements at the existing Venice High School campus. Project implementation would not increase population in the project area and the project is not designed or intended to generate new students at Venice High School. No impact on the provision of schools would occur.

d) Parks?

Less Than Significant Impact

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. During construction, some recreational facilities at the campus may be temporarily inaccessible. If necessary, neighboring LAUSD schools (such as to Mark Twain Middle School or Westchester High School) may be used for athletic activities such as football games, if the athletic facilities at Venice High School are unavailable. This temporary use would not be expected to adversely impact these campuses, which are designed to accommodate such uses and will be maintained by the District. During construction, some community activities that might have

171 LAUSD School Upgrade Program, Final Environmental Impact Report, Section 5.15 Public Services.

172 Ibid.



otherwise used the recreation facilities at the campus might be diverted to the surrounding recreational facilities. However, these uses would be temporary. The Venice High School recreational facilities would be enhanced with implementation of the project. Therefore, the project would not create increased demands for parks. A less than significant impact would occur.

e) Other Public Facilities?

No Impact

Demands for other public services and facilities such as libraries are generated by an increase in population in the facilities' service areas. The project is not designed to increase current student enrollment at Venice High School or generate population growth in the project area. Therefore, the project would not generate an increased demand for additional public facilities (such as libraries, hospitals, and post offices) and no new or physically altered government or public facilities would be required as a result of implementing the project. No impacts would occur.



4.16 Recreation

4.16.1 Summary of Impacts

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

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

Project-specific analysis provided in **Section 4.16.2** concludes that implementation of the Venice High School Modernization Project would have less than significant impacts on existing park and recreation facilities in the project area and no impact on the from the provision of new and/or expanded facilities.

4.16.2 Impacts Associated with the Proposed Project

4.16.2.1 Environmental Setting

The City of Los Angeles Department of Recreation and Parks operates public parks and recreational facilities in Venice. Approximately 254 acres within the Venice community are developed for parks and recreation¹⁷³ and include:

- Eight small parks:
 - ◆ Amorosa Triangle, Los Angeles, CA (approximately 0.9 mile from the campus)
 - ◆ Canal Park, 200 Linnie Canal, Venice Los Angeles, CA 90291 (approximately 1.5 miles from the campus)
 - ◆ Crescent Place Triangle, Crescent Place Triangle, Venice, CA 90291 (approximately 1 mile from the campus)
 - ◆ Culver West Park, 4162 Wade Street, Los Angeles, CA (approximately 0.5 mile from the campus)
 - ◆ Marco Place Parkway, Los Angeles, CA (approximately 0.9 mile from the campus)
 - ◆ Marco Triangle, Los Angeles, CA (approximately 1 mile from the campus)
 - ◆ Nowita Triangle, Los Angeles, CA (approximately 1.2 miles from the campus)
 - ◆ San Juan Garage, Los Angeles, CA (approximately 1.6 miles from the campus)
 - ◆ Triangle Park, Oxford Ave & Marr St, Venice, CA 90291 (approximately 0.9 mile from the campus)
- Three neighborhood facilities:
 - ◆ Oakwood Recreation Center, 767 California Ave., Venice, CA 90291 (approximately 1 mile from the campus)
 - ◆ Venice Beach Recreation Center, 1800 Ocean Front Walk, Venice, CA 90291 (approximately 1.8 miles from the campus)
 - ◆ Westminster Senior Citizens Center, 1234 Pacific Ave, Venice, CA 90291 (approximately 1.7 miles from the campus)

¹⁷³ City of Los Angeles, Venice Community Plan. Available at: <http://planning.lacity.org/complan/pdf/vencptxt.pdf>.



- Two community facilities:
 - ◆ Penmar Recreation Center, 1341 Lake St., Venice, CA 90291 (approximately 0.9 mile from the campus)
 - ◆ Venice Pool, Zanja Street, 2490 Walgrove Ave, Los Angeles, CA 90066 (located within the Venice High School Campus)
- Two regional recreational areas:
 - ◆ Venice Beach, 1800 Ocean Front Walk, Venice, CA 90291 (approximately 1.8 miles from the campus)
 - ◆ Penmar Golf Course, 1233 Rose Avenue, Venice, CA 90291 (approximately 1 mile from the campus)

The closest recreational facility is the Venice Pool community facility located within the Venice High School Campus. No other public parks and recreational facilities serving the community of Venice are located within a 0.25-mile radius of the project site.

4.16.2.2 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

Demands for park and recreational facilities are typically generated by an increase in the 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 an existing campus. The project is not designed or intended to result in an increase in the student capacity. During construction, some recreational facilities at the campus may be temporarily inaccessible. If necessary, neighboring LAUSD schools (such as Mark Twain Middle School or Westchester High School) may be used for some athletic activities such as football games, if the athletic facilities at Venice High School are unavailable. This temporary use would not be expected to adversely impact these campuses, which are designed to accommodate such uses and will be maintained by the District. The Venice High School recreational facilities would be modernized and improved for students and the community with implementation of the project.

The closest recreational facility is the Venice Pool community facility located within the Venice High School Campus. The project site is not located within 0.25 mile of any other public parks or recreational facilities serving the community of Venice. In accordance with the provisions of California Code of Regulations, Title 5,¹⁷⁴ California Education Code §§ 38130–38139 and Civic Center Act,¹⁷⁵ public school facilities, including sports and recreational facilities on public school campuses (i.e., Venice High School) are available for use by the public. Organized groups may also apply to the LAUSD for use of sports and recreational facilities on public school campuses. During construction, some community activities that might have otherwise used the recreation facilities at

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

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



the campus might be diverted to the surrounding recreational facilities. However, these uses would be temporary. Based on these combined factors, the proposed project will have a less than significant impact to existing parks and recreational facilities.

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?

No Impact

The proposed project does not include nor would it result in the need for development of additional recreational facilities outside of LAUSD-owned properties. As previously noted, Venice High School has existing athletic and recreational facilities which will be modernized and improved as a part of the project. Under the project, the existing gymnasium buildings would be reconstructed and replaced by a new gymnasium building. The proposed improvements at the existing stadium, and baseball and football fields would include replacement of bleachers and grass, addition of new bleachers, and resurfacing of track. As discussed in **Sections 4.1** through **4.19**, construction and improvement of these facilities as part of proposed project would not result in adverse environmental impacts.

The proposed project would not result in any adverse impacts to local or regional recreational resources or require expansion of existing local or regional recreational facilities. Pursuant to the requirements of the Civic Center Act,¹⁷⁶ school facilities such as gyms, playing fields, stadiums, auditoriums, multipurpose rooms, cafeterias, and classrooms may be permitted by LAUSD for public use within designated time frames outside school hours. Therefore, the proposed project's improvement of existing recreation facilities at Venice High School would support and increase the availability of recreational facilities in the community near the project. No adverse impact would occur.

176 Ibid.



4.17 Transportation and Traffic

4.17.1 Summary of Impacts

The PEIR evaluated the potential for implementation of SUP-related projects to result in impacts related to transportation and traffic.

The PEIR 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**, Transportation and Traffic Standard Conditions of Approval and **SCs**.

Table 4.17-1
TRANSPORTATION AND TRAFFIC STANDARD CONDITIONS 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.

According to the PEIR, projects implemented under the SUP are anticipated to have less than significant and potentially significant impacts on transportation and traffic in the LAUSD region. The project specific analysis provided in **Section 4.17.2** concludes that implementation of the Venice High School Project would have either no impacts or less than significant impacts on transportation and traffic in the surrounding community.

4.17.2 Impacts Associated with the proposed project

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 E**.) The findings of that study are incorporated into the following impact analysis.

4.17.2.1 Environmental Setting

The Venice High School campus is bounded by Venice Boulevard to the northwest, Zanja Street to the southeast, Walgrove Avenue to the southwest, and single-family residences adjacent to Lyceum Avenue to the northeast.

Street System

Characteristics of the existing street system in the proposed project vicinity are shown in **Table 4.17-1**, Existing Street System. Vehicular and pedestrian access to Venice High School is provided via Venice Boulevard, Zanja Street, Walgrove Avenue, and Lyceum Avenue. These access routes would not change as a result of the comprehensive modernization project at Venice High School.



**Table 4.17-1
EXISTING STREET SYSTEM**

Roadway	Street Classification ¹	Posted Speed Limit (MPH)	Number of Travel Lanes	Parking	Sidewalks	Bicycle Lanes
Venice Boulevard	Boulevard II	40	6	On some segments	Yes	Yes
Lincoln Boulevard	Boulevard I/Boulevard II	35	4	On some segments	Yes	No
Walgrove Avenue	Collector	25	2	On some segments	Yes	No
Beethoven Street	Collector	30	2	Yes	Yes	No
Zanja Street	Local/Other Streets	30	2	On some segments	Yes	No
Lyceum Avenue	Local/Other Streets	25	2	Yes	Yes	No
Redwood Avenue	Local/Other Streets	25	2	Yes	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:

- Venice Boulevard, from Walgrove Avenue to Lyceum Avenue: 38,400 ADT
- Walgrove Avenue, from Venice Boulevard to Lucille Avenue: 16,200 ADT
- Zanja Street, from Redwood Avenue to Alla Road: 3,400 ADT

Intersection Operations

Level of Service (LOS) analyses were prepared for the project construction year (2018) conditions (2018 without-project) per Los Angeles Department of Transportation (LADOT) requirements and are shown in **Table 4.17-2**, Project Construction Year (2018) Without-Project Weekday Peak Hour Intersection LOS. The operating condition of study intersections and their individual turning movements are described alphabetically with a range of Level of Service (LOS A through F). LOS A indicates free-flow traffic and LOS F indicates extreme congestion and long vehicle delays.¹⁷⁷

177 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 4.17-2
PROJECT CONSTRUCTION YEAR (2018) WITHOUT-PROJECT WEEKDAY PEAK HOUR
INTERSECTION LOS

Intersection	AM Peak		PM Peak	
	V/C ¹	LOS ²	V/C ¹	LOS ²
1. Beethoven Street/Venice Boulevard	0.704	C	0.756	C
2. Lyceum Avenue/Venice Boulevard	0.627	B	0.500	A
3. Walgrove Avenue/Venice Boulevard	0.836	D	0.843	D
4. Lincoln Boulevard/Venice Boulevard	0.772	C	0.866	D
5. Beethoven Street/Zanja Street-Caswell Avenue	0.623	B	0.706	C
6. Lyceum Avenue/Zanja Street	0.397	A	0.355	A
7. Redwood Avenue/Zanja Street	0.577	A	0.632	B
8. Walgrove Avenue/Zanja Street	0.713	C	0.870	D

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

As shown in **Table 4.17-2**, all of the study 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, known as Metro;¹⁷⁸ Santa Monica Big Blue Bus;¹⁷⁹ and Culver City Bus.¹⁸⁰ The project site is served by Metro Routes 33 and 733, Big Blue Bus Route 1, and Culver City Bus Route 2, with stops along Venice Boulevard. These routes vary in service with most routes providing service every day with reduced weekend hours, resulting in trips originating every half hour.

4.17.2.2 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?**

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

179 Santa Monica Big Blue Bus. www.bigbluebus.com.

180 Culver City Bus. www.culvercity.org/enjoy/culver-city-bus.



Less Than Significant Impact

Operation

The proposed project would include modernizing, constructing, and renovating buildings and infrastructure within the Venice High School campus. The project would be constructed entirely within the existing Venice High School campus. The proposed project would not increase the number of students at Venice 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 January 2018 and be completed in January of 2020. The additional traffic generated by the construction activities would be temporary, and would last through the phases of the conservatively estimated two-year construction 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. Fifty-eight construction workers would arrive at the site at the start of the AM peak hour (7:00 a.m.). In addition, there would be an average of 28 haul trucks and 17 vendor delivery trucks per day. For the purposes of this analysis, it was assumed that two haul trucks and one vendor delivery truck would 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 activity of the project would generate approximately 296 daily PCE trips, including 70 AM PCE peak hour trips (64 inbound and 6 outbound), and 70 PM PCE peak hour trips (6 inbound and 64 outbound). Refer to **Appendix E**, Traffic Report, for detailed information regarding trip generation during project construction.

Traffic Volumes

2018 with-project (peak construction phase) traffic volumes were determined by adding the estimated new project trips to the project construction year (2018) without-project traffic volumes. Since project-related daily construction traffic is relatively low (one percent or less) and largely focused along Venice Boulevard, the addition of 296 PCE ADT will not have any impact on the existing average daily traffic volumes along studied roadway segments, including Venice Boulevard, from Walgrove Avenue to Lyceum Avenue; Walgrove Avenue, from Venice Boulevard to Lucille Avenue; and Zanja Street, from Redwood Avenue to Alla Road.



Study Area Intersection Operations

The project traffic impact analysis focused on the weekday a.m. (7:00 to 9:00 a.m.) peak period and the p.m. (4:00 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 eight 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. Beethoven Street/Venice Boulevard,
2. Lyceum Avenue/Venice Boulevard,
3. Walgrove Avenue/Venice Boulevard,
4. Lincoln Boulevard/Venice Boulevard,
5. Beethoven Street/Zanja Street,
6. Lyceum Avenue/Zanja Street,
7. Redwood Avenue/Zanja Street,
8. Walgrove Avenue/Zanja Street.

The study intersections were analyzed for the following study scenarios: (1) Construction year (2018) Condition; and, (2) 2018 With-Project (Peak Construction Activity) Condition.

The intersection operations analysis conducted for the study area evaluated the 2018 with-project (peak construction phase) weekday AM and PM peak hour conditions with the proposed project. **Table 4.17-3**, Project Construction Year (2018) and 2018 with-Project Peak Hour Intersection Level of Service provides a comparison between the Existing without- and with-Project conditions for the weekday AM and PM peak hours.

**Table 4.17-3
PROJECT CONSTRUCTION YEAR (2018) AND 2018 WITH-PROJECT PEAK HOUR
INTERSECTION LEVEL OF SERVICE**

Intersection	Project Construction Year (2018)				2018 Plus Project				V/C Change		Impact	
	AM Peak		PM Peak		AM Peak		PM Peak		AM	PM	AM	PM
	V/C ¹	LOS ²	V/C ¹	LOS ²	V/C ¹	LOS ²	V/C ¹	LOS ²				
1. Beethoven Street/Venice Boulevard	0.704	C	0.756	C	0.716	C	0.763	C	0.012	0.007	No	No
2. Lyceum Avenue/Venice Boulevard	0.627	B	0.500	A	0.628	B	0.509	A	0.001	0.009	No	No
3. Walgrove Avenue/Venice Boulevard	0.836	D	0.843	D	0.838	D	0.861	D	0.002	0.018	No	No
4. Lincoln Boulevard/Venice Boulevard	0.772	C	0.866	D	0.781	C	0.871	D	0.009	0.005	No	No
5. Beethoven Street/Zanja Street-Caswell Avenue	0.623	B	0.706	C	0.633	B	0.716	C	0.010	0.010	No	No



Intersection	Project Construction Year (2018)				2018 Plus Project				V/C Change		Impact	
	AM Peak		PM Peak		AM Peak		PM Peak		AM	PM	AM	PM
	V/C ¹	LOS ²	V/C ¹	LOS ²	V/C ¹	LOS ²	V/C ¹	LOS ²				
6. Lyceum Avenue/Zanja Street	0.397	A	0.355	A	0.397	A	0.355	A	0.000	0.000	No	No
7. Redwood Avenue/Zanja Street	0.577	A	0.632	B	0.577	A	0.632	B	0.000	0.000	No	No
8. Walgrove Avenue/Zanja Street	0.713	C	0.870	D	0.719	C	0.870	D	0.006	0.000	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 2018 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).¹⁸¹ As with the project construction year (2018) without-project conditions, no study intersections would operate at LOS E or F under the 2018 with-project conditions. Therefore, there would be no significant traffic impacts at the study area intersections with the addition of project construction traffic.

Vehicular Circulation

Construction traffic would predominantly flow from the existing driveway on Walgrove Avenue, towards the center of the campus. Further access will be provided along Venice Boulevard, allowing construction traffic to navigate towards the interior portion of the campus. This will create a path for construction-related traffic to exit the campus onto Venice Boulevard while minimizing the effects of construction traffic on neighborhood residential streets. The new parking lots and campus entrances/exits would be designed per the requirements of LAUSD and the LADOT. Construction vehicles accessing the campus would avoid drop-off and deliveries during the start and end of the school day. Further construction-related access and traffic specifics would be coordinated with the campus administrators, LAUSD’s Transportation Branch, and Office of Environmental Health and Safety and will be detailed in the worksite traffic control plan to be prepared in accordance with **SCT-4**.

Non-motorized Traffic and Mass Transit

The project would not generate new non-motorized traffic during project operation. During project construction, there is a possibility that some of the construction workers may walk or bike to the project site or use existing bus transit service in the project area. Therefore, the project may

181 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.

<u>With-Project LOS</u>	<u>Project-Related Increase in V/C Ratio</u>
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



generate a negligible temporary increase in non-motorized traffic during the construction phase. 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**). Therefore, project impacts associated with non-motorized traffic circulation would be less than significant.

Operation of the proposed project would not affect existing transit route or bus facilities in the project area, and not conflict with any plans or policies relative to these travel modes. The proposed project would not conflict with existing policies, plans, or programs supporting alternative transportation, and project related traffic impacts would be less than significant.

The 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.

- 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 all CMP arterial monitoring intersections where the project adds 50 or more new peak hour trips. The nearest CMP monitoring intersections are Lincoln Boulevard/Venice Boulevard, located approximately 0.5 mile from the proposed project site and Lincoln Boulevard/Marina Expressway, located approximately one mile from the proposed project site. Construction of the proposed project would not add 50 peak hour trips to Lincoln Boulevard. Similarly, the CMP requires CMP freeway mainline monitoring locations to be evaluated when the project would add 150 or more trips at the monitoring location. The nearest CMP freeway monitoring station is located on Interstate 405, approximately 1.75 miles north of Venice Boulevard. The project construction would generate fewer than 150 peak hour trips, and therefore would not add 150 trips to this CMP freeway mainline monitoring station. Based on the trip generation and location, no CMP arterial intersection or freeway mainline monitoring stations are required to be included in the analysis, and project related traffic impacts would be less than significant.

- 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?**

No Impact

As discussed in **Section 4.8**, the project site is located approximately one mile south of the Santa Monica Municipal Airport. However, the project site is not located in the airport influence area for Santa Monica Municipal Airport.¹⁸² Per Education Code § 17215, the District must receive approval from the CDE and California Department of Transportation before acquiring title to property for a new school site if the proposed site is within 2 nautical miles of an airport runway. However,

182 Airport Land Use Commission (ALUC), Los Angeles County. Santa Monica Airport Influence Area. May 13, 2003. http://planning.lacounty.gov/assets/upl/project/aluc_airport-santa-monica.pdf. Accessed October 2016.



Education Code § 17215 does not apply to school sites acquired prior to January 1, 1966, nor to any additions or extensions to those sites. Venice High School is an existing campus acquired prior to January 1, 1966 and the proposed project would be constructed within the existing Venice High School campus. Additionally, the Santa Monica Municipal Airport is scheduled to close in 2028.¹⁸³

The project site is not located within the vicinity of a private airstrip. A heliport is located just under one mile southwest of the project site. Venice High School is an existing campus; therefore, the proposed project would not create any new safety hazards associated with heliport operations.

For these reasons, the project would not result in a change in air traffic patterns that would result in safety risks and no impact would occur.

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

No Impact

The proposed project is located on an existing school campus, and does not include changes to roadways or intersections in the vicinity of the project site. While the proposed project would not increase existing student capacity, circulation patterns may be affected by reconfiguring access points for ingress and egress (i.e., moving the existing parking lot and related school driveways). Although the final project site plan concept has not been decided, project concept site plans reveal that parking would be expanded and relocated in several areas within the campus. The new parking lots and campus entrances/exits would be designed per the requirements of LAUSD and the LADOT. Parking lots and entrances along Walgrove Avenue will keep the existing access points as-is, with no major alterations to the existing flow of vehicles once the construction is completed. Additionally, project concept plans display a new entrance along Venice Boulevard primarily in the northernmost portion of the campus. The project concept site plans also show that there is a potential for the existing driveways along Zanja Street to be enhanced to allow entry and exit to a campus parking lot off Zanja Street. All other existing driveways and parking lots would generally continue to be accessible through the existing driveways in roughly the same locations.

With access points planned to remain on both Venice Boulevard and Walgrove Avenue, general traffic flow to the campus would remain similar to the existing condition. The project would not substantially alter or impact roads, sight lines or land uses. Therefore, the project would not result in a substantial increase in roadway hazards due to a design feature and no impact would occur.

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 intersections in the vicinity of the project site, and does not include changes to the roadway access to the project site. Venice 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.” 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. Although

183 Santa Monica Municipal Airport, <https://www.smgov.net/departments/airport/>, accessed March 9, 2017.



the final project site plan concept has not been decided, the project concept site plans show that an internal vehicular emergency access would be better defined through the center of the campus, in a roughly east-west fashion to allow for emergency vehicle access. 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.

- 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 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 and no bicycle paths are located directly adjacent to the site. As discussed in **Section 4.17.2.1**, the project site is served by Metro Routes 33 and 733, Big Blue Bus Route 1, and Culver City Bus Route 2, with stops along Venice Boulevard. Operation of the proposed project would not affect existing transit route or bus facilities in the project area, and not conflict with any plans or policies related to these travel modes. The proposed project would not conflict with existing policies, plans, or programs supporting alternative transportation.

During construction activities, the project may affect sidewalk accessibility within the Venice High School campus. However, any effects on sidewalk accessibility would be temporary and transient. 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.



4.18 Tribal Cultural Resources

4.18.1 Summary of Impacts

Appendix C-2, Phase I Cultural Resources Survey provides an assessment of Tribal Cultural Resources as they relate to the proposed project.

The PEIR 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**, Tribal Cultural Resources Standard Conditions of Approval and **SCs**.

Table 4.18-1
Tribal Cultural Resources Standard Conditions 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 Impacts Associated with the Proposed Project

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.

a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource 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).

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 Public Resources Code § 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.¹⁸⁴

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 (**Appendix C** in **Appendix C-2**). Additionally, the site has not been recommended for historic designation for prehistoric and tribal cultural resources, even though the Venice High School campus has been designated as eligible for the National Register of Historic Places¹⁸⁵ and the California Register.¹⁸⁶ 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.

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

To date, LAUSD has not received any requests for notification or consultation from California Native American tribes regarding resources defined by Public Resources Code § 21074. 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.

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

185 Heumann 2002.

186 Sapphos 2014.



4.19 Utilities and Service Systems

4.19.1 Summary of Impacts

The PEIR evaluated the potential for implementation of the SUP-related site-specific projects to impact utilities and service systems. Upon implementation of regulatory requirements and **SCs**, the impacts associated with utilities and service systems would be less than significant.

The PEIR 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**, Utilities and Service Systems Standard Conditions of Approval and **SCs**.

Table 4.19-1
Utilities and Service Systems Standard Conditions of Approval

Applicable SCs	Description
SC-USS-1	<p>School Design Guide. Construction and demolition waste shall be recycled to the maximum extent feasible. LAUSD has established a minimum non-hazardous construction and demolition debris recycling requirement of 75% by weight as defined in Specification 01340, Construction & Demolition Waste Management.</p> <p>Guide Specifications 2004 - Section 01340, Construction & Demolition Waste 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.</p>

According to the PEIR, projects implemented under the SUP are anticipated to have less than significant impacts on utilities and service systems in the LAUSD region. Similarly, the project specific analysis provided in **Section 4.19.2** concludes that implementation of the Venice High School Project would also have less than significant impacts or no impacts on utilities and service systems.

4.19.2 Impacts Associated with the Proposed Project

4.19.2.1 Environmental Setting

Existing Site Conditions

The project site is served by an existing sewer collection and conveyance system and wastewater treatment services 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.¹⁸⁷ The City of Los Angeles Bureau of Sanitation also provides solid waste collection services for Venice 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 (MWD), 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 (LACFCD), the City of Los Angeles, and U.S. Army Corps of Engineers. The primary drainage channel in the west Los Angeles Basin (within the Santa Monica Bay Watershed), in which the campus is located, is Ballona Creek.

4.19.2.2 Impact Analysis

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

Less Than Significant

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**, Hydrology and Water Quality.

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 Storm Water Pollution Prevention Plan (SWPPP), which was developed in 2005, and subsequently updated in 2007 and 2009. LAUSD's construction contracting protocols, for new or existing sites which would undergo land disturbance, provide Best Management Practices (BMPs) to prevent or minimize stormwater pollution, including submission of a SWPPP¹⁸⁸ to the Los Angeles Regional Water Quality Control Board (LARWQCB). With adherence to LAUSD standards 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 LARWQCB, and impacts would be less than significant.

187 City of Los Angeles Bureau of Sanitation, Sewer System Management Plan, Hyperion Sanitary Sewer System, February 2015.

188 LAUSD School Upgrade Program Draft EIR, June 2014, at pages 5.9-9 to 5.9-12.



- 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 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 onsite 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.

- 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 requiring review and approval of grading plans as they relate to design and construction of onsite improvements that affect drainage. The District would comply with California Government Code § 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.

- 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 the Venice High School. Therefore, and as previously noted in the response to **Checklist Question b)**, following construction of the project, the campus would not require a new or increased demand for water; therefore, the proposed project would not require new or expanded water supplies. No impact would occur.

- 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 increase student capacity at the Venice High School. Therefore, and as previously noted in the response to **Checklist Question b)**, following construction of the project, the campus would not require a new or increased demand for wastewater treatment services; therefore, the proposed project would not require new or expanded wastewater treatment capacity. No impact would occur.

- 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 AB 341 recycling requirement. 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 disposal capacity would be less than significant.

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

No Impact

As previously noted, the proposed project would 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, 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 would comply with city, county, and state solid waste diversion, reduction, and recycling mandates, including; thereby ensuring that there would be no impact in solid waste management. No impact would occur.



4.20 Mandatory Findings of Significance

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

The PEIR analyzes the environmental impacts associated with cumulative development pursuant to future development that would be planned, constructed, and operated under the SUP. The PEIR addresses the cumulative impacts of school-related development within the entire 710-square-mile school district. According to the PEIR, 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/ND, 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. Potential impacts related to biological and cultural resources would be reduced to less than significant levels with incorporation of the required **SC**. Compliance with **SC**, 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 concluded to be 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, mineral resources, and recreation. Incorporation of the required **SC**, and other applicable federal, state and City regulations would preclude significant cumulative impacts with regard to the remaining environmental issue areas analyzed in



❖ MANDATORY FINDINGS OF SIGNIFICANCE ❖

this IS/ND. 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/ND, 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 **SC**. For the balance of the environmental issue areas discussed in this IS/ND compliance with **SC** and applicable federal, state and City regulations would reduce impacts, if any, below a level of significance.



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6.0 LIST OF PREPARERS

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7.0 STANDARD CONDITIONS OF APPROVAL

Los Angeles Unified School District
Standard Conditions of Approval

Venice High School Comprehensive
Modernization

April 2017

Standard Conditions of Approval

Apply if Checked	Reference #	Topic	Trigger for Compliance	Implementation Phase	Standard Conditions	Original Source	Responsible Implementing Party	Signature of Responsible Party (OEHS)
AESTHETICS								
<input checked="" type="checkbox"/>	SC-AE-1	Degradation of neighborhood character	Demolition of historic building or construction of a new building	During project design (Planning)	School Design Guide. This document outlines measures for re-use rather than destruction of historical resources. Requires the consideration of architectural appearance/consistency and other aesthetic factors during the preliminary design review for a proposed school upgrade project. Architectural quality must consider compatibility with the surrounding community.	School Design Guide. Los Angeles Unified School District. Current Version.	Design Builder	_____ Signature Title: Date:
<input checked="" type="checkbox"/>	SC-AE-2	Degradation of neighborhood character	May increase graffiti and accumulation of rubbish and debris along the walls adjacent to public rights-of-way	During project operation (Planning, Construction & Post-Construction)	School Design Guide. This document outlines measures to reduce aesthetic impacts around schools, such as shrubs and ground treatments that deter taggers, vandal-resistant and graffiti-resistant materials, painting, etc.	School Design Guide. Los Angeles Unified School District. Current Version.	Design Builder and LAUSD, FSD, M&O	_____ Signature Title: Date:
<input checked="" type="checkbox"/>	SC-AE-3	Degradation of neighborhood character and viewshed obstruction	Increase density, height, bulk, or decrease setback compared to the surrounding neighborhood; increase opportunities for graffiti	During project design (Planning)	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.	2004 New Construction Program EIR Mitigation Measure AE-1.1 , adopted by the Board of Education on June 2004.	Design Builder	_____ Signature Title: Date:
<input type="checkbox"/>	SC-AE-4	Outdoor signs with electronic message display	Install or change a school marquee	Prior to final design and prior to and during installation	Marquee Signs Bulletin BUL-5004.1. This policy provides guidance for the procurement and installation of marquee signs (outdoor sign with electronic message display) on District campuses. The policy includes requirements for the design, approval, placement, operation, and maintenance of electronic school marquees erected and operated at a LAUSD schools. The policy also includes measures to mitigate light and glare, such as the use of "luminaries" in connection with school construction.	School marquees (outdoor sign with electronic message display). BUL-5004.1 adopted May 25, 2010.	Design Builder	_____ Signature Title: Date:

Standard Conditions of Approval

Apply if Checked	Reference #	Topic	Trigger for Compliance	Implementation Phase	Standard Conditions	Original Source	Responsible Implementing Party	Signature of Responsible Party (OEHS)
<input type="checkbox"/>	SC-AE-5	Shadows	Construction of buildings or structures taller than surrounding neighborhood	Prior to project approval	OEHS CEQA Specification Manual, Appendix F, Protocol for Shadow Analysis in CEQA Documents for Proposed School Sites. This document outlines the methodology and impact thresholds for shadow analysis.	LAUSD OEHS CEQA Specification Manual, Appendix F, Protocol For Shadow Analysis In CEQA Documents For Proposed School Sites. December 2005, Revised June 2007.	LAUSD OEHS	_____ Signature Title: Date:
<input checked="" type="checkbox"/>	SC-AE-6	Light and glare	Generate additional light and/or glare	During and after installation of lights (Construction)	School Design Guide. This document outlines requirements for lighting and measures to minimize glare for pedestrians, drivers and sports teams, and to avoid light spilling onto adjacent properties.	School Design Guide. Los Angeles Unified School District. Current Version.	Design Builder	_____ Signature Title: Date:
<input checked="" type="checkbox"/>	SC-AE-7	Light and glare	Generate additional light and/or glare	Prior to building occupation, first stadium event, or first use of lights (Construction)	LAUSD shall reduce the lighting intensity from the new sources on adjacent residences to no more than two foot-candles, measured at the residential property line. LAUSD shall utilize hoods, filtering louvers, glare shields, and/or landscaping as necessary to achieve the standard. The lamp enclosures and poles shall also be painted to reduce reflection. Following installation of lights the lighting contractor shall review and adjust lights to ensure the standard is met.	2004 New Construction Program EIR Mitigation Measure AE-1.2 , adopted by the Board of Education on June 2004.	Design Builder	_____ Signature Title: Date:
<input checked="" type="checkbox"/>	SC-AE-8	Light and glare	Generate additional light and/or glare	Prior to building occupation, first stadium event, or first use of lights (Construction)	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 of the area as well as consideration for the community. The MLO also incorporates the	Based on The Collaborative for High Performance Schools. High Performance Schools Best Practices Manual, Volume III--Criteria. Version 1.0, November 1, 2001. Adopted by the Board of Education on October 28, 2003. Updated 2009 CHPS Scorecard with 2011 Amendments. SS5.1: Light Pollution Reduction. Includes additional language from International Dark-Sky Association (IDA).	Design Builder	_____ Signature Title: Date:

Standard Conditions of Approval

Apply if Checked	Reference #	Topic	Trigger for Compliance	Implementation Phase	Standard Conditions	Original Source	Responsible Implementing Party	Signature of Responsible Party (OEHS)
					<p>Backlight-Uplight-Glare (BUG) rating system for luminaires, which provides more effective control of unwanted light. IDA-IESNA Model establishes standards to:</p> <ul style="list-style-type: none"> • Limit the amount of light that can be used • Minimize glare by controlling the amount of light that tends to create glare • Minimize sky glow by controlling the amount of uplight • Minimize the amount of off-site impacts or light trespass 			
<input checked="" type="checkbox"/>	SC-CUL-2	Treatment of Historical Resources	Project may directly or indirectly affect historical resources (i.e., buildings, structures, historic districts, and contributing site plan and landscaping features that are either designated or eligible for local, state, or federal landmark listing)	During project design, design development, pre-construction and construction (Planning & Construction)	<p>Role of Historic Architect on Design-Build Team</p> <p>The tasks of the Historic Architect on the Design-Build team shall include (but not necessarily be limited to) the following:</p> <ol style="list-style-type: none"> 1. The Historic Architect shall work with the Design Builder and LAUSD to ensure that project components, including new construction and modernization of existing facilities, continue to comply with applicable historic preservation standards, including the <i>Secretary of the Interior's Standards for the Treatment of Historic Properties</i> and <i>LAUSD Design Guidelines and Treatment Approaches for Historic Schools</i>. The Historic Architect shall work with the Design-Builder throughout the design process to develop project options that facilitate compliance with the applicable historic preservation standards. 2. For new construction, the Historic Architect shall work with the Design-Builder and LAUSD to identify options and opportunities for (1) ensuring compatibility of scale and character for new construction, site and landscape features, and circulation corridors, and (2) ensuring that new construction is designed and sited in such a way that reinforces and strengthens, as much as 	<p>School Design Guide. Los Angeles Unified School District. Current Version.</p> <p>Los Angeles Unified School District Design Guidelines and Treatment Approaches for Historic Schools. January 2015.</p>	Historic Architect	<p>_____</p> <p>Signature</p> <p>Title:</p> <p>Date:</p>

Standard Conditions of Approval

Apply if Checked	Reference #	Topic	Trigger for Compliance	Implementation Phase	Standard Conditions	Original Source	Responsible Implementing Party	Signature of Responsible Party (OEHS)
					<p>feasible, character-defining site plan features, landscaping, and circulation corridors throughout campus.</p> <p>3. For modernization and upgrade projects involving contributing (significant) buildings or features, the Historic Architect shall work with the Design-Builder and LAUSD to ensure that specifications for design and implementation of projects comply with the applicable historic preservation standards.</p> <p>4. The Historic Architect shall participate in design team meetings through all phases of the project through 100 percent construction drawings, pre-construction, and construction phases.</p> <p>5. The Historic Architect shall produce brief memos, at the 50 percent and 100 percent construction drawings stages, demonstrating how principal project components and treatment approaches comply with applicable historic preservation standards, including the <i>Secretary of the Interior's Standards for the Treatment of Historic Properties</i> and <i>LAUSD Design Guidelines and Treatment Approaches for Historic Schools</i>. The memos will be reviewed by LAUSD and incorporated into the Mitigation Monitoring and Report Plan (MMRP) for the project.</p> <p>6. The Historic Architect shall participate in pre-construction and construction monitoring activities to ensure continuing conformance with Secretary's Standards and/or avoidance of a material impairment of the historical resources.</p> <p>7. The Historic Architect shall provide specialized Construction Specifications Institute (CSI) specifications for architectural features or materials requiring restoration, removal, or on-site storage. This shall include</p>			

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					<p>detailed instructions on maintaining and protecting in place relevant features.</p> <p>8. The Design-Builder and Historic Architect shall be responsible for incorporating LAUSD's recommended updates and revisions during the design development and review process.</p>			
AIR QUALITY								
<input checked="" type="checkbox"/>	SC-AQ-1	Air Toxics Health Risk	Place new classrooms or outdoor play areas: -Within ¼-mile of mobile and stationary emission sources -Within 500 feet of a major transportation corridor (freeway, major rail line) -Within 500 feet of a major stationary source of emissions -On the LAUSD priority list of schools most at risk from air pollution -Near a high-risk facility previously identified by the OEHS.	Prior to project approval (Planning)	<p>OEHS CEQA Specification Manual [Appendix J], Air Toxics Health Risk Assessment (HRA).</p> <p>This document includes guidance on HRA protocols for permitted, nonpermitted, and mobile sources that might reasonably be anticipated to emit hazardous air emissions and result in potential long-term and short-term health impacts to student and staff at the school site.</p>	LAUSD OEHS CEQA Specification Manual, [Appendix J], Air Toxics Health Risk Assessment (HRA). December 2005, Revised June 2007.	LAUSD OEHS	<p style="text-align: center;">Signature</p> <p>Title:</p> <p>Date:</p>

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<input checked="" type="checkbox"/>	SC-AQ-2	Construction Emissions	Requires the use of large construction equipment	During construction	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.	LAUSD Best Management Practices, adopted by the Board of Education on June 2004 as part of the 2004 Program EIR.	Design Builder	_____ Signature Title: Date:
<input checked="" type="checkbox"/>	SC-AQ-3	Construction Emissions	Requires a removal action for soil contamination	During construction	<p>LAUSD's construction contractor shall:</p> <ul style="list-style-type: none"> • Maintain slow speeds with all vehicles. • Load impacted soil directly into transportation trucks to minimize soil handling. • Water/mist soil as it is being excavated and loaded onto the transportation trucks. • Water/mist and/or apply surfactants to soil placed in transportation trucks prior to exiting the site. • 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. 	LAUSD Best Management Practices, adopted by the Board of Education on June 2004 as part of the 2004 Program EIR.	Design Builder	_____ Signature Title: Date:
<input checked="" type="checkbox"/>	SC-AQ-4	Construction Emissions	Exterior construction and the use of large, heavy or noisy construction equipment	During planning and construction (Planning & Construction)	<p>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.</p> <p>LAUSD shall mandate that construction bid contracts include the measures identified in the air quality assessment. Measures shall reduce construction emissions during high-emission</p>	2004 New Construction Program EIR Mitigation Measure AQ-2.1 , adopted by the Board of Education on June 2004.	LAUSD OEHS and Design Builder	_____ Signature Title: Date:

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					<p>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:</p> <p><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.</p> <p><u>Fugitive Dust</u> Apply non-toxic soil stabilizers according to manufacturers' specification to all inactive construction areas (previously graded areas</p>			

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					<p>inactive for ten days or more). Replace ground cover in disturbed areas as quickly as possible. Sweep streets at the end of the day if visible soil material is carried onto adjacent public paved roads (recommend water sweepers with reclaimed water). Install wheel washers where vehicles enter and exit unpaved roads onto paved roads, or wash off trucks and any equipment leaving the site each trip. Pave construction roads that have a traffic volume of more than 50 daily trips by construction equipment, and/or 150 daily trips for all vehicles. Pave all construction access roads for at least 100 feet from the main road to the project site. Water the disturbed areas of the active construction site at least three times per day, except during periods of rainfall. Enclose, cover, water twice daily, or apply non-toxic soil binders according to manufacturers' specifications to exposed piles (i.e., gravel, dirt, and sand) with a five percent or greater silt content. Suspend all excavating and grading operations when wind speeds (as instantaneous gusts) exceed 25 miles per hour (mph). Apply water at least three times daily, except during periods of rainfall, to all unpaved road surfaces. Limit traffic speeds on unpaved road to 15 mph or less. Prohibit high emission causing fugitive dust activities on days where violations of the ambient air quality standard have been forecast by SCAQMD. Tarp and/or maintain a minimum of 24 inches of freeboard on trucks hauling dirt, sand, soil, or other loose materials. Limit the amount of daily soil and/or demolition debris loaded and hauled per day.</p> <p><u>General Construction</u></p>			

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					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.			
<input checked="" type="checkbox"/>	SC-AQ-5	Air Pollutant Emissions	Increases student capacity and/or generates additional traffic	During school operation	LAUSD shall encourage ride-sharing programs for students and teachers as well as maintain fleet vehicles such as school buses, maintenance vehicles, and other service fleet vehicles in good condition in order to prevent significant increases in air pollutant emissions created by operation of a new school.	LAUSD Best Management Practices, adopted by the Board of Education on June 2004 as part of the 2004 Program EIR.	LAUSD OEHS and School Administration	_____ Signature Title: Date:
BIOLOGICAL RESOURCES								
<input type="checkbox"/>	SC-BIO-1	Sensitive Species and Habitat	May affect sensitive species and/or their habitat within or near a project site Alter surface drainage in a way that affects sensitive species and/or their habitat	As part of the site-specific CEQA review process; agency coordination prior to the start of construction; monitoring during construction	LAUSD qualified biologist shall identify sensitive species and their habitat within or near proposed project site. LAUSD will conduct a literature search, which shall consider a one-mile radius beyond the project construction site and shall be performed by a qualified biologist with knowledge of local biological conditions as well as the use and interpretation of the data sources identified below. Where appropriate, in the opinion of the biologist, the literature search shall be supplemented with a site visit and/or aerial photo analysis. Resources and information that shall be investigated for each site should include, but not be limited to: <ul style="list-style-type: none"> USFWS National Marine Fisheries Services (NMFS) 	2004 New Construction Program EIR Mitigation Measures B-1.1 and B-1.2 , adopted by the Board of Education on June 2004. Recommendations as listed in CDFW SUP Draft EIR comment letter dated August 4, 2014.	LAUSD OEHS	_____ Signature Title: Date:

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					<ul style="list-style-type: none"> • CDFW • California Native Plant Society (CNPS) • County and/or city planning or environmental offices for sensitive species, habitat, and/or heritage trees that may not exist on published databases. • CNDDDB • CNPS Rare Plant Inventory • Local Audubon Society • Los Angeles County Department of Regional Planning for information on Significant Ecological Areas • California Digital Conservation Atlas for district-wide location of reserves, plan areas, and land trusts that may overlap with project sites. <p><u>Biological Resources Report</u> If the LAUSD qualified biologist determines that a school construction project will affect an identified sensitive plant, animal, or habitat, a biological resources report shall be prepared. To provide a complete assessment of the flora and fauna within and adjacent to a site-specific project impact area, with particular emphasis on identifying endangered, threatened, sensitive, and locally unique species and sensitive habitats, the biological resources report shall include the following.</p> <p>Information on regional setting that is critical to the assessment of rare or unique resources</p> <p>A thorough, recent floristic-based assessment of special status plants and natural communities, following the CDFW's <i>Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities</i>. CDFW recommends that floristic, alliance- and/or association-based mapping and vegetation impact assessments be conducted at the project site and neighboring vicinity. The <i>Manual of California Vegetation (Sawyer et al.)</i> should also be used to inform this mapping and assessment.</p>			

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					<p>Adjoining habitat areas should be included in this assessment where site activities could lead to direct or indirect impacts onsite. Habitat mapping at the alliance level will help establish baseline vegetation conditions.</p> <p>A current inventory of the biological resources associated with each habitat type onsite and within the area of potential effect. CDFW's California Natural Diversity Data Base (CNDDB) should be contacted to obtain current information on any previously reported sensitive species and habitat, including Significant Natural Areas identified under Chapter 12 of the Fish and Game Code.</p> <p>An inventory of rare, threatened, and endangered, and other sensitive species onsite and within the area of potential effect. Species to be addressed should include all those identified in CEQA Guidelines Section 15380, including sensitive fish, wildlife, reptile, and amphibian species. Seasonal variations in use of the project area should also be addressed. Focused species-specific surveys, conducted at appropriate time of year and time of day when sensitive species are active or otherwise identifiable, are required. Acceptable species-specific survey procedures should be developed in consultation with the CDFW and USFWS.</p> <p>A discussion of the potential adverse impacts from light, noise, human activity, exotic species, and drainage. Drainage analysis should address project-related changes on drainage patterns on and downstream from the site; the volume, velocity, and frequency of existing and post-project surface flows; polluted runoff; soil erosion and/or sedimentation in streams and water bodies; and post-project fate of runoff from the project site.</p> <p>Discussions about direct and indirect project impacts on biological resources, including resources in nearby public lands, open space,</p>			

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					<p>adjacent natural habitats, wetland and riparian ecosystems, and any designated and/or proposed or existing reserve lands (e.g., preserve lands associated with a NCCP). Impacts on, and maintenance of, wildlife corridor/movement areas, including access to undisturbed habitats in adjacent areas.</p> <p>Mitigation measures for adverse project-related impacts to sensitive plants, animals, and habitats. Measures should emphasize avoidance and reduction of biological impacts. For unavoidable impacts, onsite habitat restoration or enhancement should be outlined. If onsite measures are not feasible or would not be biologically viable, offsite measures through habitat creation and/or acquisition and preservation in perpetuity should occur. This measure should address restrictions on access, proposed land dedications, monitoring and management programs, control of illegal dumping, water pollution, increased human intrusion, etc.</p> <p>Plans for restoration and vegetation shall be prepared by qualified biologist with expertise in southern California ecosystems and native plant vegetation techniques. Plans shall include, at a minimum:</p> <ul style="list-style-type: none"> - location of the mitigation site - plant species to be used, container sizes, and seeding rates - schematic depicting the mitigation area - planting schedule - irrigation method - measures to control exotic vegetation - specific success criteria - detailed monitoring program - contingency measures should the success criteria not be met - identification of the party responsible for meeting the success criteria and providing for conservation of the site in perpetuity. 			

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					LAUSD shall consult with the U.S. Army Corps of Engineers, USFWS and/or the CDFW and comply with any permit conditions or directives from those agencies regarding the protection, relocation, creation, and/or compensation.			
<input checked="" type="checkbox"/>	SC-BIO-2	Light Impacts to Sensitive Species	New outdoor lighting that is near sensitive species habitat	During lighting installation and prior to first use of lights (Construction)	LAUSD shall protect sensitive species from harmful exposure to light by shielding light sources, redirecting light sources, or using low intensity lighting.	2004 New Construction Program EIR Mitigation Measure B-1.3 , adopted by the Board of Education on June 2004.	Design Builder	_____ Signature Title: Date:
<input checked="" type="checkbox"/>	SC-BIO-3	Bird and Bat Nesting Sites	Project site or construction staging are near and/or cause direct disturbances to native and nonnative vegetation, structures, and/or substrates during nesting season (February 1 through August 31; as early as January 1 for some raptors)	Prior to start of construction (Construction)	<p>LAUSD shall comply with the following:</p> <p>Project activities (including, but not limited to, staging and disturbances to native and nonnative vegetation, structures, and substrates¹⁸⁹) should occur outside of avian breeding season to avoid take of birds or their eggs.¹⁹⁰ Depending on the avian species present, a qualified biologist may determine that a change in the breeding season dates is warranted.</p> <p>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</p>	2004 New Construction Program EIR Mitigation Measure B-1.4 , adopted by the Board of Education on June 2004. Recommendations as listed in CDFW SUP Draft EIR comment letter dated August 4, 2014.	Design Builder	_____ Signature Title: Date:

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

190 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.

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					<p>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.</p> <p>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.</p> <p>No construction shall occur within the fenced next zone until the young have fledged, are no longer being fed by the parents, have left the nest, and will no longer be impacted by the construction.</p> <p>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</p>			

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					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.			
<input checked="" type="checkbox"/>	SC-BIO-4	Native Oak Trees	Removal of any native mature oak trees or woodland habitat	During construction	<p>LAUSD shall comply with the following: Mitigation shall not include translocation of rare plants. CDFW, in most cases does not recommend translocation, salvage, and/or transplantation of rare, threatened, or endangered plant species, in particular oak trees, as compensation for adverse effects because successful implementation of translocation is rare. Even if translocation is initially successful, it will typically fail to persist over time.</p> <p>Permanent conservation of habitat. To ensure the conservation of sensitive plant species, the preferred method is permanent conservation of habitat containing these species; any translocation proposed shall only be an experimental component of a larger, more robust plan.</p> <p>Off-site acquisition of woodland habitat. Due to the inherent difficulty in creating functional woodland habitat with associated understory components, the preferred method is off-site acquisition of woodland habitat in the local area. All acquired habitat shall be protected under a conservation easement and deeded to a local land conservancy for management and protection.</p> <p>Creation of oak woodlands. Any creation of functioning woodlands shall be of similar composition, structure, and function of the affected oak woodland. The new woodland shall mimic the function, demonstrate recruitment, plant density, and percent basal, canopy, and vegetation cover, as well as other measurable success criteria before the measure is deemed a success.</p> <p>- All seed and shrub sources used for tree and</p>	<p>2004 New Construction Program EIR Mitigation Measure B-3.1, adopted by the Board of Education on June 2004.</p> <p>Recommendations as listed in CDFW SUP Draft EIR comment letter dated August 4, 2014.</p>	Design Builder	<p>_____</p> <p>Signature</p> <p>Title:</p> <p>Date:</p>

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					<p>understory species in the new planting site shall be collected or grown from on-site sources or from adjacent areas and shall not be purchased from a supplier. This method should reduce the risk of introducing diseases and pathogens into areas where they might not currently exist.</p> <ul style="list-style-type: none"> - Oaks should be replaced by planting acorns because this has been shown to result in greater oak survival. Monitoring efforts, including the exclusion of herbivores, shall be employed to maximize seedling survival during the monitoring period. - Monitoring period for oak woodland shall be at least 10 years with a minimum of seven years without supplemental irrigation. This allows the trees to go through one typical drought cycle. This should also be the minimal time needed to see signs of stress and disease and determine the need for replacement plantings. <p>LAUSD shall request CDFW review and comment on any translocation plans, habitat preservation, habitat creation and/or restoration plans.</p>			
<input type="checkbox"/>	SC-BIO-5	Wetlands, Riparian Habitat, and other Sensitive Natural Community	May affect wetlands, riparian habitat, and other sensitive natural community	As part of the site-specific CEQA review process; agency coordination prior to the start of construction; monitoring during and after construction	<ul style="list-style-type: none"> • LAUSD shall comply with CDFW recommendations as listed below:¹⁹¹ • Project development or conversion that results in a reduction of wetland acreage or wetland habitat values shall not occur unless, at a minimum, replacement or preservation results in “no net loss” of either wetland habitat values or acreage. • All wetlands and watercourses, whether intermittent or perennial, should be retained and provided with substantial setbacks which preserve the riparian and aquatic values and maintain their value to on-site and off-site wildlife populations. • A jurisdictional delineation of creeks and their associated riparian habitats shall be conducted 	<p>2004 New Construction Program EIR Mitigation Measures B-1.1 and B-1.2, adopted by the Board of Education on June 2004.</p> <p>Recommendations as listed in CDFW SUP Draft EIR comment letter dated August 4, 2014.</p>	LAUSD OEHS	<p>_____</p> <p>Signature</p> <p>Title:</p> <p>Date:</p>

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

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					as part of the biological resources report. The delineation should be conducted pursuant to the USFWS wetland definition. <ul style="list-style-type: none"> Implementation of recommended measures shall compensate for affected mature riparian corridors and loss of function and value of wildlife corridors. 			
CULTURAL RESOURCES								
<input checked="" type="checkbox"/>	SC-CUL-1	Treatment of Historical Resources	Project may directly or indirectly affect historical resources (i.e., buildings, structures, historic districts, and contributing site plan and landscaping features that are either designated or eligible for local, state, or federal landmark listing)	During project design, design development, pre-construction and construction (Planning & Construction)	<p>Design Build Team to Include Qualified Historic Architect</p> <p>For campuses with qualifying historical resources under CEQA, the Design-Build team shall include a qualified Historic Architect. The Historic Architect shall provide input to ensure ongoing compliance, as project plans progress, with the <i>Secretary of the Interior's Standards</i> and LAUSD requirements and guidelines for the treatment of historical resources (specific requirements follow in SC-CUL-2).</p> <p>For projects involving structural upgrades to historic resources, the Design-Build team shall include a qualified Structural Engineer with a minimum of eight (8) years of demonstrated project-level experience in Historic Preservation.</p> <p>The Historic Architect/s shall meet the Secretary of the Interior's Professional Qualifications Standards and the standards described on page 8 of the <i>LAUSD Design Guidelines and Treatment Approaches for Historic Schools</i>. The Historic Architect shall provide input throughout the design and construction process to ensure ongoing compliance with the above-mentioned standards.</p>	<p>Los Angeles Unified School District Design Guidelines and Treatment Approaches for Historic Schools. January 2015.</p> <p>LAUSD OEHS CEQA Specification Manual, Appendix H, Historical Resources Policy, (Appendix E.2) LAUSD Cultural Resource Assessment Procedures. December 2005, Revised June 2007.</p>	Design Builder and Historic Architect	<p>_____</p> <p>Signature</p> <p>Title:</p> <p>Date:</p>

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☑	SC-CUL-2	Treatment of Historical Resources	Project may directly or indirectly affect historical resources (i.e., buildings, structures, historic districts, and contributing site plan and landscaping features that are either designated or eligible for local, state, or federal landmark listing)	During project design, design development, pre-construction and construction (Planning & Construction)	<p>Role of Historic Architect on Design-Build Team</p> <p>The tasks of the Historic Architect on the Design-Build team shall include (but not necessarily be limited to) the following:</p> <ol style="list-style-type: none"> 1. The Historic Architect shall work with the Design Builder and LAUSD to ensure that project components, including new construction and modernization of existing facilities, continue to comply with applicable historic preservation standards, including the <i>Secretary of the Interior's Standards for the Treatment of Historic Properties</i> and <i>LAUSD Design Guidelines and Treatment Approaches for Historic Schools</i>. The Historic Architect shall work with the Design-Builder throughout the design process to develop project options that facilitate compliance with the applicable historic preservation standards. 2. For new construction, the Historic Architect shall work with the Design-Builder and LAUSD to identify options and opportunities for (1) ensuring compatibility of scale and character for new construction, site and landscape features, and circulation corridors, and (2) ensuring that new construction is designed and sited in such a way that reinforces and strengthens, as much as feasible, character-defining site plan features, landscaping, and circulation corridors throughout campus. 3. For modernization and upgrade projects involving contributing (significant) buildings or features, the Historic Architect shall work with the Design-Builder and LAUSD to ensure that specifications for design and implementation of projects comply with the applicable historic preservation standards. 4. The Historic Architect shall participate in design team meetings through all phases of the project through 100 percent construction drawings, 	<p>School Design Guide. Los Angeles Unified School District. Current Version.</p> <p>Los Angeles Unified School District Design Guidelines and Treatment Approaches for Historic Schools. January 2015.</p>	Historic Architect	<p>_____</p> <p style="text-align: center;">Signature</p> <p>Title:</p> <p>Date:</p>

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					<p>pre-construction, and construction phases.</p> <p>5. The Historic Architect shall produce brief memos, at the 50 percent and 100 percent construction drawings stages, demonstrating how principal project components and treatment approaches comply with applicable historic preservation standards, including the <i>Secretary of the Interior's Standards for the Treatment of Historic Properties</i> and <i>LAUSD Design Guidelines and Treatment Approaches for Historic Schools</i>. The memos will be reviewed by LAUSD and incorporated into the Mitigation Monitoring and Report Plan (MMRP) for the project.</p> <p>6. The Historic Architect shall participate in pre-construction and construction monitoring activities to ensure continuing conformance with Secretary's Standards and/or avoidance of a material impairment of the historical resources.</p> <p>7. The Historic Architect shall provide specialized Construction Specifications Institute (CSI) specifications for architectural features or materials requiring restoration, removal, or on-site storage. This shall include detailed instructions on maintaining and protecting in place relevant features.</p> <p>8. The Design-Builder and Historic Architect shall be responsible for incorporating LAUSD's recommended updates and revisions during the design development and review process.</p>			
☒	SC-CUL-3	Treatment of Historical Resources	Project may directly or indirectly affect historical resources (i.e., buildings, structures, historic districts,	During project design, design development, pre-construction and construction (Planning & Construction)	<p>School Design Guide and LAUSD Design Guidelines and Treatment Approaches for Historic Schools.</p> <p>LAUSD has adopted policies and guidelines that apply to projects involving historic resources. The Design-Builder and Historic Architect shall apply these guidelines, which include the <i>LAUSD School</i></p>	<p>School Design Guide. Los Angeles Unified School District. Current Version.</p> <p>Los Angeles Unified School District Design Guidelines and Treatment Approaches for Historic Schools. January 2015.</p>	Design Builder and Historic Architect	<p style="text-align: center;">_____ Signature</p> <p>Title: Date:</p>

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			and contributing site plan and landscaping features that are either designated or eligible for local, state, or federal landmark listing)		<p><i>Design Guide</i> and <i>LAUSD Design Guidelines and Treatment Approaches for Historic Schools</i> and the <i>Secretary's Standards</i> for all new construction and upgrade/modernization projects. In keeping with the district's adopted policies and goals, LAUSD shall re-use rather than destroy historical resources where feasible.</p> <p>LAUSD shall follow the guidelines outlined in these documents to the maximum extent practicable when planning and implementing projects and adjacent new construction involving historical resources. General guidelines shall include:</p> <ul style="list-style-type: none"> • Retain and preserve the historic character of buildings, structures, landscapes, and site features that are historically significant. • Repair rather than remove, replace, or destroy character-defining features; if replacement is necessary, replace in-kind to match in materials and appearance. • Avoid removing, obscuring, or destroying character-defining features and materials. • Treat distinctive architectural features or examples of skilled craftsmanship that characterize a building with sensitivity. • Conceal reinforcement required for structural stability or the installation of life safety or mechanical systems. • Undertake surface cleaning, preparation of surfaces, and other projects involving character-defining features using the least invasive, gentlest means possible. Avoid sandblasting and chemical treatments. 			
<input checked="" type="checkbox"/>	SC-CUL-4	Historical Resource Document	Demolition or potential damage to any recognized historic resources or any contributors to a	Prior to demolition or major alteration (Planning & Construction)	Prior to demolition or mothballing activities, LAUSD shall retain a professional architectural photographer and a historian or architectural historian who meets the Secretary of the Interior's Professional Qualifications Standards to prepare HABS-like documentation for the historical resources slated for demolition.	2004 New Construction Program EIR Mitigation Measure C-1.5, adopted by the Board of Education on June 2004.	Design Builder	<p style="text-align: center;">_____ Signature</p> <p>Title: Date:</p>

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			historic district		<p>The HABS-like package will document in photographs and descriptive and historic narrative the historical resources slated for demolition. Documentation prepared for the package will draw upon primary- and secondary-source research and available studies previously prepared for the project. Measured drawings shall not be required for the project.</p> <p>The specifications for the HABS-like package follow:</p> <p>Photographs: Photographic documentation will focus on the historical resources/features slated for demolition, with overview and context photographs for the campus and adjacent setting. Photographs will be taken of interior and exterior features of the buildings using a professional-quality single lens reflex (SLR) digital camera with a minimum resolution of 10 megapixels. Photographs will include context views, elevations/exteriors, architectural details, overall interiors, and interior details (if warranted). Digital photographs will be printed in black and white on archival film paper and also provided in electronic format.</p> <p>Descriptive and Historic Narrative: The historian or architectural historian will prepare descriptive and historic narrative of the historical resources/features slated for demolition. Physical descriptions will detail each resource, elevation by elevation, with accompanying photographs, and information on how the resource fits within the broader campus during its period of significance. The historic narrative will include available information on the campus design, history, architect/contractor/designer as appropriate, area history, and historic context. In addition, the narrative will include a methodology section specifying the name of researcher, date of research, and sources/archives visited, as well as a bibliography. Within the written history, statements shall be footnoted as to their sources, where</p>			

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					<p>appropriate.</p> <p>Historic Documentation Package Submittal: The draft package will be assembled by the historian or architectural historian and submitted to LAUSD for review and comment. After final approval, one hard-copy set of the package will be prepared as follows: Photographs will be individually labeled and stored in individual acid-free sleeves. The remaining components of the historic documentation package (site map, photo index, historic narrative, and additional data) will be printed on archival bond, acid-free paper.</p> <p>Upon completion of the descriptive and historic narrative, all materials will be compiled in electronic format and presented to LAUSD for review and approval. Upon approval, one hard-copy version of the historic documentation package will be prepared and submitted to LAUSD. The historian or architectural historian shall offer a hardcopy package and compiled, electronic version of the final package to the Los Angeles Public Library (Central Library), Los Angeles Historical Society, and the South Central Coastal Information Center, to make available to researchers.</p>			
<input checked="" type="checkbox"/>	SC-CUL-5	Historical Resource Reuse	Demolition of any of the recognized historic structures	Prior to demolition or alteration (Construction)	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.	none	Design Builder	<hr/> Signature Title: Date:
<input checked="" type="checkbox"/>	SC-CUL-6	Historical Resource Reuse	Demolition of any of the recognized historic structures	Prior to demolition or alteration (Construction)	LAUSD, consistent with Education Code Section 17545, shall offer for sale any remaining functional and defining features and building materials from the buildings. These materials could include doors, windows, siding, stones, lighting, doorknobs, hinges, cabinets, and appliances, among others. They shall be made available to the public for sale and reuse, if features are not retained by LAUSD for reuse or display.	none	Design Builder	<hr/> Signature Title: Date:

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<input checked="" type="checkbox"/>	SC-CUL-7	Archaeological Resource	Project area is deemed highly sensitive for archaeological resources	Prior to and during grading, excavation, or other ground-disturbing activities (Construction)	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).	none	Design Builder	_____ Signature Title: Date:
<input checked="" type="checkbox"/>	SC-CUL-8	Historic and Archaeological Resource	Historical or unique archaeological resources are discovered during construction activities	During grading, excavation, or other ground-disturbing activities (Construction)	The contractor shall halt construction activities in the immediate area and notify the LAUSD. LAUSD shall retain a qualified archeologist to make an immediate evaluation of significance and appropriate treatment of the resource. To complete this assessment, the qualified archeologist will be afforded the necessary time to recover, analyze, and curate the find. The qualified archeologist shall recommend the extent of archeological monitoring necessary to ensure the protection of any other resources that may be in the area. Construction activities may continue on other parts of the building site while evaluation and treatment of historical or unique archaeological resources takes place.	2004 New Construction Program EIR Mitigation Measure C-1.7, adopted by the Board of Education on June 2004.	Design Builder	_____ Signature Title: Date:
<input checked="" type="checkbox"/>	SC-CUL-9	Archaeological Resource Monitoring Program	Phase I Archaeological Site Investigation shows a strong possibility that unique resources, and/or unique architectural resources have been identified on a site	Prior to the start of construction	LAUSD shall implement an archaeological monitoring program for construction activities at a site prepared by a qualified archaeologist under the following conditions: (1) when a Phase I Site Investigation shows a strong possibility that unique archeological resources are buried on the site; and/or (2) when unique architectural resources have been identified on a site, but LAUSD does not implement a Phase III Data Recovery/Mitigation Program because the resources can be recovered through the archaeological monitoring program.	2004 New Construction Program EIR Mitigation Measure C-1.8, adopted by the Board of Education on June 2004.	Design Builder	_____ Signature Title: Date:
<input checked="" type="checkbox"/>	SC-CUL-10	Archaeological Resource	Evidence of prehistoric or historic cultural resources is uncovered	During grading, excavation, or other ground-disturbing activities (Construction)	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	none	Design Builder	_____ Signature Title: Date:

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					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.			
<input checked="" type="checkbox"/>	SC-CUL-11	Archaeological Resource	Project construction requires archaeological monitoring	Prior to the start grading, excavation, or other ground-disturbing activities (Construction)	Cultural resources sensitivity training shall be conducted by a qualified archaeologist for all construction workers involved in moving soil or working near soil disturbance. This training shall review the types of archaeological resources that might be found, along with laws for the protection of resources.	none	Design Builder	_____ Signature Title: Date:
<input checked="" type="checkbox"/>	SC-CUL-12	Archaeological Resource	Unique archaeological resources are discovered and LAUSD determines not to avoid them by abandoning the site or redesigning the project	During grading, excavation, or other ground-disturbing activities (Construction)	LAUSD shall determine whether it is feasible to prepare and implement a Phase III Data Recovery/Mitigation Program. A Phase III Data Recovery/Mitigation Program would be designed by a Qualified Archaeologist to recover a statistically valid sample of the archaeological remains and to document the site to a level where the impacts can be determined to be less than significant. All documentation shall be prepared in the standard format of the ARMR Guidelines, as prepared by the OHP. Once a Phase III Data Recovery/Mitigation Program is completed, an archaeological monitor shall be present on site to oversee the grading, demolition activities, and/or initial construction activities to ensure that construction proceeds in accordance with the adopted Phase III Data Recovery/Mitigation Program. The extent of the Phase III Data Recovery/Mitigation Program and the extent and duration of the archaeological monitoring program depend on site-specific factors.	2004 New Construction Program EIR Mitigation Measure C-1.9, adopted by the Board of Education on June 2004.	Design Builder	_____ Signature Title: Date:
<input checked="" type="checkbox"/>	SC-CUL-13	Native American Resource	Evidence of Native American resources is	During grading, excavation, or other ground-	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	none	Design Builder	_____ Signature

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			uncovered	disturbing activities (Construction)	archaeologist and the local Native American representative has been contacted and consulted to assist in the accurate recordation and recovery of the resources.			Title: Date:
<input checked="" type="checkbox"/>	SC-CUL-14	Paleontological Resource	Cultural Resources Assessment identifies a project area as sensitive for paleontological resources	During grading, excavation, or other ground-disturbing activities (Construction)	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.	2004 New Construction Program EIR Mitigation Measure C-1.10, adopted by the Board of Education on June 2004.	Design Builder	_____ Signature Title: Date:
<input checked="" type="checkbox"/>	SC-CUL-15	Paleontological Resource	Project area is deemed highly sensitive for paleontological resources	During grading, excavation, or other ground-disturbing activities	The paleontological monitor shall be on site for all ground altering activities and shall advise LAUSD as to necessary means of protecting potentially significant paleontological resources, including, but not limited to, possible cessation of construction activities in the immediate area of a find. If resources are identified during the monitoring program, the paleontologist shall be afforded the necessary time and funds to recover, analyze, and curate the find(s). Subsequently, the monitor shall remain on site for the duration of the ground disturbances to insure the protection of any other resources that may be in the area.	2004 New Construction Program EIR Mitigation Measure C-1.11, adopted by the Board of Education on June 2004.	Design Builder	_____ Signature Title: Date:
GEOLOGY and SOILS								
<input checked="" type="checkbox"/>	SC-GEO-1	Seismic Hazards	Requires grading, excavation, or other ground-disturbing activities	During project design, and project construction (Planning & Construction)	OEHS CEQA Specification Manual, Appendix G, Supplemental Geohazard Assessment Scope of Work. This document outlines the procedures and scope for LASUD geohazard assessments.	LAUSD OEHS CEQA Specification Manual, Appendix G, Supplemental Geohazard Assessment Scope of Work. December 2005, Revised June 2007.	Design Builder	_____ Signature Title: Date:

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GREENHOUSE GAS EMISSIONS								
<input checked="" type="checkbox"/>	SC-GHG-1	Water Use and Efficiency	Requires work on water pumps, valves, piping, and/or tanks	During school operation (Post-Construction)	During school operation, LAUSD shall perform regular preventative maintenance on pumps, valves, piping, and tanks to minimize water loss.	LAUSD Best Management Practices, adopted by the Board of Education on June 2004 as part of the 2004 Program EIR	LAUSD M&O	_____ Signature Title: Date:
<input checked="" type="checkbox"/>	SC-GHG-2	Water Use and Efficiency	Requires work on landscape irrigation system	Prior to full operation of irrigation system (Post-Construction)	LAUSD shall utilize automatic sprinklers set to irrigate landscaping during the early morning hours to reduce water loss from evaporation.	LAUSD Best Management Practices, adopted by the Board of Education on June 2004 as part of the 2004 Program EIR	LAUSD M&O	_____ Signature Title: Date:
<input checked="" type="checkbox"/>	SC-GHG-3	Water Use and Efficiency	Requires work on landscape irrigation system	Prior to full operation of irrigation system (Post-Construction)	LAUSD shall reset automatic sprinkler timers to water less during cooler months and rainy season.	LAUSD Best Management Practices, adopted by the Board of Education on June 2004 as part of the 2004 Program EIR	LAUSD M&O	_____ Signature Title: Date:
<input checked="" type="checkbox"/>	SC-GHG-4	Water Use and Efficiency	Requires work on landscape and/or irrigation system	Prior to full operation of irrigation system (Construction)	LAUSD shall develop a water budget for landscape (both non-recreational and recreational) and ornamental water use to conform to the local water efficient landscape ordinance. If no local ordinance is applicable, then use the landscape and ornamental budget outlined by the California Department of Water Resources.	The Collaborative for High Performance Schools. High Performance Schools Best Practices Manual, Volume III-- Criteria. Version 1.0, November 1, 2001. Adopted by the Board of Education on October 28, 2003. Updated 2009 CHPS Scorecard with 2011 Amendments. Prerequisite. Construction Waste Management. WE1.0C.P1 and LAUSD 2014 School Design Guide.	LAUSD M&O	_____ Signature Title: Date:
<input checked="" type="checkbox"/>	SC-GHG-5	Energy Efficiency	Building construction	Prior to occupancy (Planning & Construction)	LAUSD shall ensure that the time dependent valued energy of the proposed project design is at least 10 percent, with a goal of 20 percent less than a standard design that is in minimum compliance with the California Title 24, Part 6 energy efficiency standards that are in force at the time the project is submitted to the Division of the State Architect.	The Collaborative for High Performance Schools. High Performance Schools Best Practices Manual, Volume III-- Criteria. Version 1.0, November 1, 2001. Adopted by the Board of Education on October 28, 2003. Updated 2009 CHPS Scorecard with 2011	Design Builder and LAUSD FSD and M&O	_____ Signature Title: Date:

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<input checked="" type="checkbox"/>	SC-USS-1	Solid Waste (construction)	Generate construction and/or demolition debris	Prior to start and during construction (Construction)	<p>School Design Guide. Construction and demolition waste shall be recycled to the maximum extent feasible. LAUSD has established a minimum non-hazardous construction and demolition debris recycling requirement of 75% by weight as defined in Specification 01340, Construction & Demolition Waste Management.</p> <p>Guide Specifications 2004 - Section 01340, Construction & Demolition Waste 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.</p>	<p>Amendments. Prerequisite. Energy Efficiency. EE1.0C.P1 and LAUSD 2014 School Design Guide.</p> <p>School Design Guide. Current Version; Specification 01340, Construction & Demolition Waste Management, July 7, 2003; LAUSD Best Management Practices, adopted by the Board of Education on June 2004 as part of the 2004 Program EIR; The Collaborative for High Performance Schools. High Performance Schools Best Practices Manual, Volume III-- Criteria. Version 1.0, November 1, 2001. Adopted by the Board of Education on October 28, 2003. Updated 2009 CHPS Scorecard with 2011 Amendments. Prerequisite. Construction Waste Management. ME2.0C.P1 and LAUSD 2014 School Design Guide.</p>	Design Builder	<p>_____</p> <p>Signature</p> <p>Title:</p> <p>Date:</p>
HAZARDS and HAZARDOUS MATERIALS								
<input type="checkbox"/>	SC-HAZ-1	Electro-magnetic fields	Place new classrooms or outdoor play areas near power lines or cell towers	Prior to project approval	<p>OEHS CEQA Specification Manual, Appendix M, Criteria for School Siting in Proximity to High Voltage Power Lines. Board of Education resolutions (Effects of Non-Ionizing Radiation-2000, Wireless Telecommunication Installations-2009 and T-Mobile Cell Tower Notification and</p>	<p>LAUSD OEHS CEQA Specification Manual, Appendix M, Criteria for School Siting in Proximity to High Voltage Power Lines. December 2005, Revised June 2007.</p>	LAUSD OEHS and FSD	<p>_____</p> <p>Signature</p> <p>Title:</p> <p>Date:</p>

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					Condemnation-2009) regarding electromagnetic field (EMF) and radiofrequency exposures associated with cellular towers near schools whereby a prohibition exists regarding siting towers on school campuses.	Board of Education resolutions: Effects of Non-Ionizing Radiation-2000 Wireless Telecommunication Installations-2009 T-Mobile Cell Tower Notification and Condemnation-2009		
<input type="checkbox"/>	SC-HAZ-2	Pipeline Hazards	Place new classrooms or outdoor play areas near hazardous pipelines	Prior to project approval	OEHS CEQA Specification Manual, Appendix L, Pipeline Safety Hazard Analysis. This document outlines the process for evaluating safety hazards associated with underground and above-ground natural gas and hazardous liquid pipelines. The pipeline safety hazard assessment (PSHA) process determines whether potential releases of natural gas, petroleum product and crude oil from pipelines located near a school site pose a safety risk to students and staff.	LAUSD OEHS CEQA Specification Manual, Appendix L, Pipeline Safety Hazard Analysis. December 2005, Revised June 2007.	LAUSD OEHS	_____ Signature Title: Date:
<input type="checkbox"/>	SC-HAZ-3	Rail Hazards	Place new classrooms or outdoor play areas within 1,500 feet of a railroad track easement	Prior to project approval	OEHS CEQA Specification Manual, Appendix K, Rail Safety Study Protocol. This document provides a guidance protocol for conducting a Rail Safety Study (RSS). It is designed to assist in evaluating whether traffic on rail lines within a 1,500-foot radius of a school site poses an unreasonable safety hazard to students and staff at the school.	LAUSD OEHS CEQA Specification Manual, Appendix K, Rail Safety Study. December 2005, Revised June 2007.	LAUSD OEHS	_____ Signature Title: Date:
<input checked="" type="checkbox"/>	SC-AQ-1	Air Toxics Health Risk	Place new classrooms or outdoor play areas within ¼-mile of emission sources	Prior to project approval	OEHS CEQA Specification Manual, Appendix J, Air Toxics Health Risk Assessment (HRA). This document includes guidance on HRA protocols for permitted, nonpermitted, and mobile sources that might reasonably be anticipated to emit hazardous air emissions and result in potential long-term and short-term health impacts to student and staff at the school site.	LAUSD OEHS CEQA Specification Manual, Appendix J, Air Toxics Health Risk Assessment (HRA). December 2005, Revised June 2007.	LAUSD OEHS	_____ Signature Title: Date:
HYDROLOGY and WATER QUALITY								
<input checked="" type="checkbox"/>	SC-HWQ-1	Storm Water Requirements	Land disturbance	During construction (Construction)	Stormwater Technical Manual This manual establishes design requirements and provides guidance for the cost-effective improvement of water quality in new and	Stormwater Technical Manual. Prepared for LAUSD by Geosyntec Consultants. October 2009.	Design Builder	_____ Signature Title: Date:

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					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.			
<input checked="" type="checkbox"/>	SC-HWQ-2	Storm Water Requirements	Land disturbance	During construction (Construction)	Compliance Checklist for Storm Water Requirements at Construction Sites. This checklist has requirements for compliance with the General Construction Activity Permit and is used by OEHS to evaluate permit compliance. Requirements listed include a SWPPP; BMPs for minimizing storm water pollution to be specified in a SWPPP; and monitoring storm water discharges to ensure that sedimentation of downstream waters remains within regulatory limits.	OEHS Compliance Checklist for Storm Water Requirements at Construction Sites. No Date.	Design Builder	_____ Signature Title: Date:
<input checked="" type="checkbox"/>	SC-HWQ-3	Miscellaneous Requirements	Ongoing maintenance and repair	During construction and operation (Construction & Post-Construction)	LAUSD shall implement the following programs and procedures, as applicable: Environmental Training Curriculum Hazardous Waste Management Program Medical Waste Management Program Environmental Compliance Inspections Safe School Inspections Integrated Pest Management Program Fats Oil and Grease Management Program Solid Waste Management Program	<ul style="list-style-type: none"> • 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 	Design Builder	_____ Signature Title: Date:
<input type="checkbox"/>	SC-HWQ-4	Flood Hazards	Site acquisition	During project design (Planning)	The analysis for new projects shall include evaluation of all possible flood hazards as determined by: (1) review of FEMA flood maps; (2) review of flood information provided by local city or county floodplain managers; (3) review of California Department of Water Resources dam safety information; and, (4) local drainage analysis	2004 New Construction Program EIR Mitigation Measure HWQ-5.1 , adopted by the Board of Education on June 2004.	LAUSD OEHS	_____ Signature Title: Date:

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					by a civil engineer. The flood hazard determination shall include consideration of tsunamis and debris flow. New projects should be located outside of these hazard areas, if practical.			
<input type="checkbox"/>	SC-HWQ-5	Flood Hazards	Site acquisition	During project design	Where placing the project outside the floodplain is impractical, the school or project structure shall be protected from flooding by containment and control of flood flows (e.g., elevating lowest floors at least one foot above the expected 100-year flood level).	2004 New Construction Program EIR Mitigation Measures, adopted by the Board of Education on June 2004. HWQ-5.2	LAUSD OEHS and FSD	_____ Signature Title: Date:
<input type="checkbox"/>	SC-HWQ-6	Tsunami Hazards	Place new classrooms or outdoor play areas within 0.62 mile of the coast, and less than 100 feet above mean sea level	Prior to classroom occupation	LAUSD shall evaluate tsunami hazards to determine if the project site is within a tsunami inundation zone as delineated by CalEMA or NOAA. If the project site is within a tsunami hazard zone LAUSD shall prepare and implement a tsunami awareness program and evacuation plan. This plan shall comply with the provisions of the LAUSD Emergency Operations Plan.	2004 New Construction Program EIR Mitigation Measure HWQ-5.3 , adopted by the Board of Education on June 2004.	LAUSD OEHS and FSD	_____ Signature Title: Date:
<input type="checkbox"/>	SC-HWQ-7	Debris Flow	Place new classrooms or outdoor play areas in areas subject to potentially damaging debris flow	During project design	LAUSD shall consult with the Los Angeles County Department of Public Works, and/or local city officials, as appropriate, regarding the debris flow potential near the mouth of or in natural canyons and feasible mitigation measures shall be developed to reduce any potential risk. Potential debris flow hazards shall be reduced by one or more of the following: adequate building setbacks from natural slopes, construction of debris control facilities in upstream areas, monitoring and maintaining potential debris flow areas and basins. In addition, potential loss shall be minimized by establishing an evacuation plan, and elevated awareness and early warning of pending events.	2004 New Construction Program EIR Mitigation Measure HWQ-5.4 , adopted by the Board of Education on June 2004.	LAUSD OEHS and FSD	_____ Signature Title: Date:
NOISE								
<input type="checkbox"/>	SC-N-1	Exterior Campus Noise	Exterior noise levels are or would be greater than 70 dBA L ₁₀ or 67 dBA L _{eq}	During project design	LAUSD shall include features such as sound walls, building configuration, and other design features in order to attenuate exterior noise levels on a school campus to less than 70 dBA L ₁₀ or 67 dBA L _{eq} .	2004 New Construction Program EIR Mitigation Measure N-1.1 , adopted by the Board of Education on June 2004.	LAUSD OEHS and FSD and Design Builder	_____ Signature Title: Date:
<input checked="" type="checkbox"/>	SC-N-2	Interior Classroom Noise	Interior classroom noise levels would be	During project design	LAUSD shall analyze the acoustical environment of the site (such as traffic) and the characteristics of planned building components (such as heating,	2004 New Construction Program EIR Mitigation Measure N-1.2 , adopted by	LAUSD OEHS and FSD and	_____

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			greater than 55 dBA L ₁₀ or 45 dBA L _{eq}		<p>ventilation, and air conditioning [HVAC]), and design to achieve interior classroom noise levels of less than 55 dBA L₁₀ or 45 dBA L_{eq} with maximum (unoccupied) reverberation times of 0.6 seconds. Noise reduction methods shall include, 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.</p> <ul style="list-style-type: none"> • 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. • 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. 	the Board of Education on June 2004.	Design Builder	Signature Title: Date:
<input checked="" type="checkbox"/>	SC-N-3	Traffic Noise	Project-related traffic noise level exceeds local noise standards, policies, or ordinances	Prior to project approval	LAUSD shall require an acoustical analysis to identify feasible measures to reduce traffic noise increases to 3 dBA CNEL or less at the noise-sensitive land use. LAUSD shall implement recommended measures to reduce noise.	2004 New Construction Program EIR Mitigation Measure N-2.1, adopted by the Board of Education on June 2004.	LAUSD OEHS	Signature Title: Date:
<input checked="" type="checkbox"/>	SC-N-4	Operational Noise	Operational noise levels exceeds local	During project design and construction	LAUSD shall incorporate long-term permanent noise attenuation measures between playgrounds, stadiums, and other noise-generating facilities and	2004 New Construction Program EIR Mitigation Measure N-2.2, adopted by	Design Builder	Signature Title: Date:

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			noise standards, policies, or ordinances at noise-sensitive land uses		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.	the Board of Education on June 2004.		Signature Title: Date:
<input checked="" type="checkbox"/>	SC-N-5	Construction Noise and Vibration (Annoyance)	Construction on an existing school campus	Prior to construction	LAUSD Facilities Division or its construction contractor shall consult and coordinate with the school principal or site administrator, and other nearby noise sensitive land uses prior to construction to schedule high noise or vibration producing activities to minimize disruption. Coordination between the school, nearby land uses and the construction contractor shall continue on an as-needed basis throughout the construction phase of the project to reduce school and other noise sensitive land use disruptions.	2004 New Construction Program EIR Mitigation Measure N-3.1, adopted by the Board of Education on June 2004.	Design Builder	Signature Title: Date:
<input checked="" type="checkbox"/>	SC-N-6	Vibration (Structural Damage)	Rock blasting or demolition activities	During construction	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.	2004 New Construction Program EIR Mitigation Measure N-5.1, adopted by the Board of Education on June 2004.	Design Builder	Signature Title: Date:
<input checked="" type="checkbox"/>	SC-N-7	Vibration (Structural Damage)	Pile driving or heavy vibration activities	During construction (Construction)	For projects where pile driving activities are required within 150 feet of a structure, a detailed vibration assessment shall be provided by an acoustical engineer to analyze potential impacts related to vibration to nearby structures and to determine feasible mitigation measures to eliminate potential risk of architectural damage.	none		Signature Title: Date:
<input checked="" type="checkbox"/>	SC-N-8	Vibration (Structural Damage)	Vibration intensive activities are	Prior to and during demolition and construction	LAUSD shall meet with the construction contractor to discuss alternative methods of demolition and construction for activities within 25 feet of a historic	none	Design Builder	Signature

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			planned within 25 feet of a historic building or structure	(Construction)	<p>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.</p> <p>Prior to construction activities, the construction contractor shall inspect and report on the current foundation and structural condition of the historic building.</p> <p>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.</p> <p>The construction contractor shall avoid use of vibratory rollers and packers adjacent to a historic building.</p> <p>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.</p> <p>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.</p>			<p>Title:</p> <p>Date:</p>
<input checked="" type="checkbox"/>	SC-N-9	Construction Noise	Exterior construction and the use of large, heavy or noisy construction equipment	During construction (Construction)	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 construction	LAUSD Best Management Practices, adopted by the Board of Education on June 2004 as part of the 2004 Program EIR.	Design Builder	<p>_____</p> <p>Signature</p> <p>Title:</p> <p>Date:</p>

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					<p>noise levels exceed local noise standards, policies, or ordinances at noise-sensitive receptors. LAUSD shall mandate that construction bid contracts include the measures identified in the noise assessment. Specific noise reduction measures include, but are not limited to, the following:</p> <p><u>Source Controls</u></p> <p>Time Constraints – prohibiting work during sensitive nighttime hours</p> <p>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)</p> <p>Equipment Restrictions – restricting the type of equipment used</p> <p>Noise Restrictions – specifying stringent noise limits</p> <p>Substitute Methods – using quieter methods and/or equipment</p> <p>Exhaust Mufflers – ensuring equipment have quality mufflers installed</p> <p>Lubrication & Maintenance – well maintained equipment is quieter</p> <p>Reduced Power Operation – use only necessary size and power</p> <p>Limit Equipment On-Site – only have necessary equipment on-site</p> <p>Noise Compliance Monitoring – technician on site to ensure compliance</p> <p>Quieter Backup Alarms – manually-adjustable or ambient sensitive types</p> <p><u>Path Controls</u></p> <p>Noise Barriers – semi-permanent or portable wooden or concrete barriers</p> <p>Noise Curtains – flexible intervening curtain systems hung from supports</p> <p>Enclosures – encasing localized and stationary noise sources</p> <p>Increased Distance – perform noisy activities farther away from receptors, including operation</p>			

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					<p>of portable equipment, storage and maintenance of equipment</p> <p><u>Receptor Controls</u> 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.</p>			
<input checked="" type="checkbox"/>	SC-AQ-2	Construction Emissions	Requires the use of large construction equipment	During construction	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.	LAUSD Best Management Practices, adopted by the Board of Education on June 2004 as part of the 2004 Program EIR.	Design Builder	<p>_____</p> <p>Signature</p> <p>Title:</p> <p>Date:</p>
PEDESTRIAN SAFETY								
<input type="checkbox"/>	SC-PED-1	Pedestrian Safety Analysis	Increase student capacity by more than 25% or 10 classrooms	During project design	<p>Caltrans SRTS program. LAUSD is a participant in the SRTS program administered by Caltrans and local law enforcement and transportation agencies. OEHS provides pedestrian safety evaluations as a component of traffic studies conducted for new school projects. This pedestrian safety evaluation includes a determination of whether adequate walkways and sidewalks are provided along the perimeter of, across from, and adjacent to a proposed school site and along the paths of identified pedestrian routes</p>	OEHS pedestrian safety evaluation	LAUSD OEHS	<p>_____</p> <p>Signature</p> <p>Title:</p> <p>Date:</p>

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					within a 0.25-mile radius of a proposed school site. The purpose of this review is to ensure that pedestrians are adequately separated from vehicular traffic.			
<input type="checkbox"/>	SC-PED-2	Pedestrian Safety Analysis	Increase student capacity by more than 25% or 10 classrooms	During project design	OEHS CEQA Specification Manual, Appendix C, Traffic and Pedestrian Safety Requirements LAUSD has developed these performance guidelines to minimize potential pedestrian safety risks to students, faculty and staff, and visitors at LAUSD schools. The performance guidelines include the requirements for: student drop-off areas, vehicle access, and pedestrian routes to school. Appendix C states school traffic studies shall identify measures to ensure separation between pedestrians and vehicles along potential pedestrian routes, such as sidewalks, crosswalks, bike paths, crossing guards, pedestrian and traffic signals, stop signs, warning signs, and other pedestrian access measures.	LAUSD OEHS CEQA Specification Manual, Appendix C, Traffic and Pedestrian Safety Requirements for New Schools. December 2005, Revised June 2007.	LAUSD OEHS	_____ Signature Title: Date:
<input type="checkbox"/>	SC-PED-3	Pedestrian Safety Analysis	Increase student capacity by more than 25% or 10 classrooms	During project design	OEHS CEQA Specification Manual, Appendix D, Sidewalk Requirements for New Schools LAUSD shall coordinate with the responsible traffic jurisdiction/agency to ensure these areas are improved prior to the opening of a school. Improvements shall include, but are not limited to: <ul style="list-style-type: none"> Clearly designate passenger loading areas with the use of signage, painted curbs, etc. Install new walkway and/or sidewalk segments where none exist. Any substandard walkway/sidewalk segments shall be improved to a minimum of eight feet wide. Provide other alternative measures that separate foot traffic from vehicular traffic, such as distinct travel pathways or barricades. 	LAUSD OEHS CEQA Specification Manual, Appendix D, Sidewalk Requirements for New Schools. December 2005, Revised June 2007.	LAUSD OEHS	_____ Signature Title: Date:
<input type="checkbox"/>	SC-PED-4	Pedestrian Safety Analysis	Increase student capacity by more than 25% or 10 classrooms	Prior to project approval	School Traffic Safety Reference Guide REF- 4492.1. This Reference Guide replaces Reference Guide 4492.0, School Traffic Safety, September 30, 2008. Updated information is provided, including new guidance on passenger loading zones and the Safety Valet Program. Guide sets forth requirements	LAUSD Traffic Safety Reference Guide. REF-4492.1. July 23, 2012	LAUSD OEHS	_____ Signature Title: Date:

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					for traffic and pedestrian safety, and procedures for school principals to request assistance from OEHS, the Los Angeles Schools Police Department (LASPD), or the local police department regarding traffic and pedestrian safety. Distribution and posting of the Back to School Safety Tips flyer is required. This guide also includes procedures for traffic surveys, parking restrictions, crosswalks, advance warning signs (school zone), school parking signage, traffic controls, crossing guards, or for determinations on whether vehicle enforcement is required to ensure the safety of students and staff.			
<input checked="" type="checkbox"/>	SC-PED-5	Safe Access to School	Construct bus loading area, student drop-off/pick-up area and/or parking	During project design (Planning)	School Design Guide. The Guide states student drop-off and pick-up, bus loading areas, and parking areas shall be separated to allow students to enter and exit the school grounds safely.	LAUSD School Design Guide. Los Angeles Unified School District. Current Version.	Design Builder	_____ Signature Title: Date:
POPULATION and HOUSING								
<input type="checkbox"/>	SC-PH-1	Property Displacement	Residential or business property acquisition	Prior to construction	Relocation Assistance Advisory Program LAUSD shall conform to all residential and business displacement guidelines presented in the LAUSD's Relocation Assistance Advisory Program which complies with all items identified in the California State Relocation Assistance and Real Property Acquisition Guidelines (California Code of Regulations Title 25, Division 1, Chapter 6).	LAUSD's Relocation Assistance Program	LAUSD Real Estate and Asset Management	_____ Signature Title: Date:
PUBLIC SERVICES								
<input checked="" type="checkbox"/>	SC-PS-1	Emergency Protection Services	New building, new school, change in campus traffic circulation	Prior to construction (Planning & Construction)	LAUSD shall: 1) have local fire and police jurisdictions review all construction and site plans prior to the State Fire Marshall's final approval; and 2) provide a full site plan for the local review, including all buildings, both existing and proposed, fences, drive gates, retaining walls, and other construction affecting emergency vehicle access, with unobstructed fire lanes for access indicated.	LAUSD Best Management Practices, adopted by the Board of Education on June 2004 as part of the 2004 Program EIR.	LAUSD OEHS and FSD and Design Builder	_____ Signature Title: Date:
<input checked="" type="checkbox"/>	SC-PS-2	Emergency Preparedness & Response	Practice on a standard schedule during school operation	During school operation (Post-Construction)	LAUSD shall implement emergency preparedness and response procedures in all schools as required in LAUSD References, Bulletins, Safety Notes, and Emergency Preparedness Plans.	REF-5803.2 - Emergency Drills and Procedures, August 26, 2013 SAF:30 - Emergency	LAUSD, OEHS, FSD, M&O and Administration	_____ Signature

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			& during emergencies or disaster situations			Response Protocol for LASUD Exiting Facilities, March 2, 2007 Emergency Operations Plan, updated April 2010 BUL-6084.0 - Use of School Facilities in an Emergency or Disaster Situation, June 11, 2013 REF-5511.2 - Safe School Plans Update for 2013-2014, August 15, 2013 BUL-5433.1 - District Emergency Response and Preparedness, March 8, 2013 REF-5451.1 - School Site Emergency/Disaster Supplies, April 12, 2013 REF 5741.0 - Emergency Response - Communications and Response Actions, April 23, 2012 Other LAUSD Emergency Preparedness Plans include earthquakes, bio-terrorism, heavy rain and flooding, disturbances/demonstrations, school safety, West Nile virus precautions, procedures for reentry and cleanup of fire damaged building, disposal procedures for hazardous waste and universal waste.		Title: Date:

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TRANSPORTATION and TRAFFIC								
<input type="checkbox"/>	SC-T-1	Traffic Analysis	Increase student capacity by more than 25% or 10 classrooms and additional traffic	Prior to project approval	<p>OEHS CEQA Specification Manual, Appendix C, Traffic and Pedestrian Safety Requirements for New Schools.</p> <p>Requirements identifies performance requirements for the selection and design of school sites to minimize potential pedestrian safety risks:</p> <ul style="list-style-type: none"> • Site Selection • Bus and Passenger Loading Areas • Vehicle Access • Pedestrian Routes to School <p>Requirements also state school traffic studies shall identify measures to ensure separation between pedestrians and vehicles along potential pedestrian routes, such as sidewalks, crosswalks, bike paths, crossing guards, pedestrian and traffic signals, stop signs, warning signs, and other pedestrian access measures.</p>	LAUSD OEHS CEQA Specification Manual, Appendix C, Traffic and Pedestrian Safety Requirements for New Schools. December 2005, Revised June 2007.	LAUSD OEHS	<p>_____</p> <p>Signature</p> <p>Title:</p> <p>Date:</p>
<input type="checkbox"/>	SC-T-2	Vehicular Access and Parking	Construction of parking, and/or vehicular or pedestrian access	During project design	<p>School Design Guide.</p> <p>Vehicular access and parking shall comply with Section 2.3, Vehicular Access and Parking of the School Design Guide, January 2014 (and/or Current Version). The Design Guide contains the following regulations related to traffic:</p> <ul style="list-style-type: none"> • Parking Space Requirements • General Parking Guidelines • Vehicular Access and Pedestrian Safety • Parking Structure Security 	School Design Guide. Los Angeles Unified School District. Current Version.	Design Builder	<p>_____</p> <p>Signature</p> <p>Title:</p> <p>Date:</p>
<input type="checkbox"/>	SC-T-3	Traffic Analysis	Increase student capacity by more than 25% or 10 classrooms and/or generates additional traffic or shifts traffic patterns	Prior to project approval	<p>Coordinate with the local City or County jurisdiction and agree on the following:</p> <ul style="list-style-type: none"> • Compliance with the jurisdiction’s design guidelines for access, parking, and circulation in the vicinity of the project. • Scope of analysis and methodology for the traffic and pedestrian study, including trip generation rates, trip distribution, number and location of intersections to be studied, and traffic impact thresholds. • Implementation of SR2S, traffic control and pedestrian safety devices. • Fair share contribution and/or other mitigation 	none	LAUSD OEHS	<p>_____</p> <p>Signature</p> <p>Title:</p> <p>Date:</p>

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					measures for potential traffic impacts. <ul style="list-style-type: none"> Traffic and pedestrian safety impact studies shall address local traffic and congestion during morning arrival times, and before and after evening stadium events. Traffic study will use the latest version of Institute of Transportation Engineer's (ITE) Trip Generation manual to determine trip generation rates (parent vehicles, school buses, staff/faculty vehicles, and delivery vehicles) based on the size of the school facility, unless otherwise required by local jurisdiction. Loading zones will be analyzed to determine the adequacy as pick-up and drop-off points. Recommendations will be developed in consultation with the local jurisdiction for curb loading bays or curb parking restrictions to accommodate loading needs and will control double parking and across-the-street loading. 			
<input checked="" type="checkbox"/>	SC-T-4	Construction Traffic	Large construction equipment required to use public roadways	Prior construction (Construction) to	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.	none	Design Builder	<hr/> Signature Title: Date:
TRIBAL CULTURAL RESOURCES								
<input checked="" type="checkbox"/>	SC-TCR-1	Native American Resource	Evidence of Native American resources is uncovered	During grading, excavation, or other ground-disturbing activities (Construction)	(Driving Factor: In response to recent legislation, SC-TCR-1 has been added to ensure that the District's Standard Conditions of Approval reflect a specific condition for handling Tribal Cultural Resources.) 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	none	Design Builder	<hr/> Signature Title: Date:

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					representative has been contacted and consulted to assist in the accurate recordation and recovery of the resources.			
UTILITIES and SERVICE SYSTEMS								
<input checked="" type="checkbox"/>	SC-USS-1	Solid Waste (construction)	Generate construction and/or demolition debris	Prior to start and during construction (Construction)	<p>School Design Guide. Construction and demolition waste shall be recycled to the maximum extent feasible. LAUSD has established a minimum non-hazardous construction and demolition debris recycling requirement of 75% by weight as defined in Specification 01340, Construction & Demolition Waste Management.</p> <p>Guide Specifications 2004 - Section 01340, Construction & Demolition Waste 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.</p>	School Design Guide. Current Version; Specification 01340, Construction & Demolition Waste Management, July 7, 2003; LAUSD Best Management Practices, adopted by the Board of Education on June 2004 as part of the 2004 Program EIR; The Collaborative for High Performance Schools. High Performance Schools Best Practices Manual, Volume III-- Criteria. Version 1.0, November 1, 2001. Adopted by the Board of Education on October 28, 2003. Updated 2009 CHPS Scorecard with 2011 Amendments. Prerequisite. Construction Waste Management. ME2.0C.P1 and LAUSD 2014 School Design Guide.	Design Builder	<p>_____</p> <p>Signature</p> <p>Title:</p> <p>Date:</p>
<input type="checkbox"/>	SC-USS-2	Water Supply	Excavation near water lines	During construction	LAUSD shall coordinate with the City of Los Angeles Department of Water and Power or other appropriate jurisdiction and department prior to the relocation or upgrade of any water facilities to reduce the potential for disruptions in service.	LAUSD Best Management Practices, adopted by the Board of Education on June 2004 as part of the 2004 Program EIR.	LAUSD FSD and M&O	<p>_____</p> <p>Signature</p> <p>Title:</p> <p>Date:</p>
<input type="checkbox"/>	SC-USS-3	Solid Waste (operation)	New school or new school construction on	During operation	Provide easily accessible area serving the entire school that are dedicated to the collection and storage of materials for recycling including (at a	The Collaborative for High Performance Schools. High Performance Schools Best	LAUSD OEHS and M&O	<p>_____</p> <p>Signature</p> <p>Title:</p>

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			existing campus		minimum) paper, cardboard, glass, plastics, metals and landscaping waste. There shall be at least one centralized collection point (loading dock), and ability for separation of recyclables where waste is disposed of for classrooms and common areas such as cafeteria's, gyms or multi-purpose rooms.	Practices Manual, Volume III-- Criteria. Version 1.0, November 1, 2001. Adopted by the Board of Education on October 28, 2003. Updated 2009 CHPS Scorecard with 2011 Amendments. Prerequisite. Storage and Collection of Recyclables. ME1.0.P2		Date:

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