December 2023| Initial Study

Irving Middle School
Major Modernization Project

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IRVING MIDDLE SCHOOL

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(Available at https://achieve.lausd.net/ceqa)

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Abbreviations and Acronyms

AAQS	ambient air quality standards
AB	Assembly Bill
ADA	Americans with Disabilities Act
AIC	Ampere Interrupting Capacity
ALUC	airport land use commission
amp	ampere
ANSI	American National Standards Institute
APN	Assessor Parcel Number
AQMP	air quality management plan
ARMR	Archaeological Resource Management Report
ASTM	American Society for Testing and Materials
bgs	below ground surface
BMP	best management practice
BOE	[LAUSD] Board of Education
BUG	Backlight-Uplight-Glare
CalEEMod	California Emissions Estimator Model
CAL FIRE	California Department of Forestry and Fire Prevention
CALGreen	California Green Building Code
Caltrans	California Department of Transportation
CARB	California Air Resources Board
CCR	California Code of Regulations
CDE	California Department of Education
CDFW	California Department of Fish and Wildlife
CERS	California Environmental Reporting System
CEQA	California Environmental Quality Act
CFCs	hydrofluorocarbons
CGP	construction general permit
CGS	California Geological Survey
CH_4	methane
CHPS	Collaborative for High Performance Schools
CHRIS	California Historical Resources Information System
CIFF	California Important Farmland Finder
CIWMP	Countywide Integrated Waste Management Plan

Abbreviations and Acronyms

CMP	Los Angeles County Congestion Management Program
CNDDB	California Natural Diversity Data Base
CNPS	California Native Plant Society
CO	carbon monoxide
CO_2	carbon dioxide
CO_2e	carbon dioxide equivalent
CREC	controlled environmental condition
CRHR	California Register of Historical Resources
CUPA	certified Unified Program agency
dB	decibels
dBA	A-weighted decibels
District	Los Angeles Unified School District
DBH	diameter at breast height
DPM	diesel particulate matter
DSA	Division of the State Architect (under the California Department of General Services)
DTSC	Department of Toxic Substances Control
DX	direct expansion
ECHO	Enforcement and Compliance History Online
EDR	Environmental Data Resources, Inc.
EIR	environmental impact report
EOP	Emergency Operations Plan
EPA	U.S. Environmental Protection Agency
ESA	Endangered Species Act
FEMA	Federal Emergency Management Agency
FHWA	Federal Highway Administration
FINDS	Facility Index System
FMMP	Farmland Mapping and Monitoring Program
FTA	Federal Transportation Authority
FTTS	EPA's Federal Insecticide, Fungicide, & Rodenticide Act (FIFRA)/Toxic Substances Control Act (TSCA) Tracking System, which tracks administrative cases and pesticide enforcement actions and compliance activities related to these acts and the Emergency Planning and Community Right-to-Know-Act (EPCRA). The FTTPS INSP database contains a listing of FTTS inspections and enforcements.
FU	fixture unit

Abbreviations and Acronyms

FY	fiscal year
GHG	greenhouse gases
GWP	global warming potential
HABS	Historic American Buildings Survey
HAZNET	A California Department of Toxic Substances Control database that records annual hazardous waste shipments, as required by RCRA. All businesses that use and dispose of hazardous materials are entered into the database.
H&SC	California Health and Safety Code
HCFCs	perfluorocarbons
HCP	habitat conservation plan
HQTA	high-quality transit area
HRA	health risk assessment
HREC	historical recognized environmental condition
HRER	Historic Resource Evaluation Report
HVAC	heating, ventilation, and air/conditioning
I	Interstate
ICS	Incident Command System
IES	Illuminating Engineering Society
in/sec	inches per second
IP	Internet Protocol
IPCC	Intergovernmental Panel on Climate Change
Irving MS	Irving Middle School
K	kindergarten
LACFD	Los Angeles County Fire Department
LADOT	City of Los Angeles Department of Transportation
LADWP	City of Los Angeles Department of Water and Power
LAFD	City of Los Angeles Fire Department
LAMC	Los Angeles Municipal Code
LAPD	City of Los Angeles Police Department
LAPL	Los Angeles Public Library
LARWQCB	Los Angeles Regional Water Quality Control Board
LASPD	Los Angeles School Police Department
LAUSD	Los Angeles Unified School District

Abbreviations and Acronyms

L_{dn}	day-night average sound level
LED	light-emitting diode
L_{eq}	equivalent continuous sound pressure
LLG	Linscott, Law & Greenspan, Engineers
L_{max}	maximum sound level
LOS	level of service
LRA	Local Responsibility Area
LZ	lighting zone
M&O	Maintenance and Operation
MBTA	Migratory Bird Treaty Act
MEP	maximum extent practicable
Metro	Los Angeles County Metropolitan Transportation Authority
mgd	million gallons per day
MLO	Model Lighting Ordinance
MND	mitigated negative declaration
mph	miles per hour
MRZ	mineral recovery zone
msl	mean sea level
MT	metric ton
$MTCO_2e$	metric ton of CO_2e
MUTCD	California Manual on Uniform Traffic Control Devices
MW	megawatts
MWD	Metropolitan Water District of Southern California
MRZ	Mineral Resource Zone
N_2O	nitrous oxide
NAHC	Native American Heritage Commission
NCCP	natural community conservation plan
ND	negative declaration
NIMS	National Incident Management System
NMFS	National Marine Fisheries Service
NO_2	nitrogen dioxide
NPDES	National Pollutant Discharge Elimination System
NRHP	National Register of Historic Places

Abbreviations and Acronyms

NWI	National Wetlands Inventory
O_3	ozone
OCPs	organochlorine pesticides
OEHS	Office of Environmental Health and Safety
OHP	Office of Historic Preservation
OPSC	California Office of Public School Construction
OSHA	Occupational Safety and Health Administration
PAHs	polyaromatic hydrocarbons
PEA-E	Preliminary Environmental Assessment Equivalent
Pb	lead
PCBs	polychlorinated biphenyl
pCI/L	picocuries per liter
PDF	project design features
PF	Public Facilities [zoning designation]
Phase I ESA	Phase I Environmental Site Assessment [for hazardous materials]
PM_{10}	coarse inhalable particulate matter
$PM_{2.5}$	fine inhalable particulate matter
ppm	parts per million
PPV	peak particle velocity
PRC	Public Resources Code
PSHA	pipeline safety hazard assessment
PWA	Public Works Administration
Q	quarter
RCRA	Resource Conservation and Recovery Act
REC	recognized environmental condition
RPS	renewables portfolio standard
RTP	regional transportation plan
RWQCB	regional water quality control board
SAB	State Allocation Board
SB	Senate Bill
SC	Standard Condition [of Approval]
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District

Abbreviations and Acronyms

SCCIC	South Central Coastal Information Center
SCS	sustainable communities strategy
SEMS	California Standardized Emergency Management System
SF_6	sulfur hexafluoride
SO_2	sulfur dioxide
SoCAB	South Coast Air Basin
SoCalGas	Southern California Gas Company
SOPs	standard operating procedures
SPED	Special Education
SR	State Route
SR2S	Safe Routes to School
SRA	State Responsibility Area
SRP	Soil Removal Plan
SRTS	Safe Routes to School
STEAM	science, technology, engineering, art, and mathematics
SUP	School Upgrade Program
SUSMP	Standard Urban Stormwater Mitigation Plan
SWPPP	stormwater pollution prevention plan
SWRCB	State Water Resources Control Board
TPH	total petroleum hydrocarbons
UCL	Upper Confidence Limit
U.S.	United States
USFWS	United States Fish and Wildlife Service
USGS	United States Geological Survey
UST	underground storage tank
UWMP	Urban Water Management Plan
V	volts
V/C	volume-to-capacity ratio
VHFHSZ	very high fire hazard severity zone
VMT	vehicle miles traveled
VOC	volatile organic compounds

Abbreviations and Acronyms

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1. Introduction

1.1 OVERVIEW

The Los Angeles Unified School District (LAUSD or District) is proposing a major modernization of Washington Irving Middle School (Irving MS), located at 3010 Estara Avenue, City of Los Angeles, Los Angeles County, California. Major Modernization Projects are designed to address the most critical physical needs of the building and grounds at the Washington Irving Middle School campus (Campus) through building replacement, renovation, modernization, and reconfiguration. The proposed Irving MS Major Modernization Project (Project) is required to undergo an environmental review pursuant to the California Environmental Quality Act (CEQA). This Initial Study provides an evaluation of the potential environmental consequences associated with this proposed Project.

1.2 BACKGROUND

The bond program began in 1997 with the initial focus on addressing overcrowded conditions—including the use of year-round multitrack calendars and busing of students to less crowded campuses—by providing new schools with traditional calendars. This goal was met with the opening of 131 new schools for K–12 students, allowing students to attend schools in their neighborhoods operating on a two-semester, single-track calendar. Since the completion of the New School Construction Program, the District's focus has shifted from constructing new facilities to correct decades of overcrowding, to now addressing aging existing school facilities. The District's priority is to upgrade existing facilities and provide additional facilities to achieve the educational benefits of smaller learning environments.[1]

In 2014, the District embarked on a new bond program known as the School Upgrade Program (SUP). Projects developed under the SUP framework focus on upgrading, modernizing, and replacing aging and deteriorating school facilities; updating technology; and addressing facilities inequities. Initially in 2014, $7.85 billion was allocated for the development of projects. Over the course of the last 7 years, new sources of funds have been allocated to the program, increasing the total amount of funds to support the development of projects to $9.2 billion. To date, nearly 2,000 projects valued at approximately $1.5 billion have been funded by the SUP and completed by LAUSD Facilities, and nearly 690 additional projects valued at approximately $5.4 billion are underway.

Measure RR was recently passed in 2020 to help address the significant and unfunded needs of Los Angeles public school facilities. Measure RR is a $7 billion bond measure aimed at continuing the funding for improvement of facilities and technology, upgrade of existing facilities, as well as increased safety measures amid the COVID-19 pandemic. In August 2021, the LAUSD Board of Education (BOE or Board) updated

[1] LAUSD Facilities Services Division, 2023, Strategic Execution Plan, p. 1.

the SUP to allocate the Measure RR funds, adjusted the categories and spending targets within the program, and approved the Measure RR Implementation Plan.

The bond program is now focused on improving equity between newer and older schools so that every student has an equal opportunity for success. The updated SUP framework and the Measure RR Implementation Plan reflect the goals of and priorities for Measure RR, as outlined in the bond language approved by voters and the Proposed 2020 Bond Funding Priorities Package previously adopted by the Board. Moreover, they also reflect the input solicited earlier this year from Community of Schools Administrators and Local District leadership. The overarching goals and principals of the SUP, which will drive the development of future projects, are to upgrade, modernize, and replace aging and deteriorating District school facilities; update technology; and address District school facilities inequities to provide students with physically and environmentally safe, secure, and updated school facilities that support 21st-century learning.[2]

On October 12, 2021, the BOE approved the project definition for the proposed Project to provide facilities that are safe, secure, and better aligned with the current instructional program. The proposed 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.[3]

1.3 CALIFORNIA ENVIRONMENTAL QUALITY ACT

The environmental compliance process is governed by CEQA[4] and the State CEQA Guidelines.[5] CEQA was enacted in 1970 by the California Legislature to disclose to decision-makers and the public the significant environmental effects of projects and to identify ways to avoid or reduce the environmental effects through feasible alternatives or mitigation measures. Compliance with CEQA applies to California government agencies at all levels: local, regional, and State agencies, boards, commissions, and special districts (such as school districts and water districts). LAUSD is the lead agency for this proposed Project and is therefore required to conduct an environmental review to analyze the potential environmental effects associated with the proposed Project.

California Public Resources Code (PRC) Section 21080(a) states that analysis of a project's environmental impact is required for any "discretionary projects proposed to be carried out or approved by public agencies." In this case, LAUSD has determined that an Initial Study is required to determine whether there is substantial evidence that construction and operation of the proposed Project would result in environmental impacts. An Initial Study is a preliminary environmental analysis to determine whether an environmental impact report (EIR), a mitigated negative declaration (MND), or a negative declaration (ND) is required for a project.[6]

[2] Based on LAUSD Facilities Services Division, Board of Education Report, Update to the School Upgrade Program to Integrate Measure RR Funding and Priorities, August 24, 2021.
[3] LAUSD. LAUSD Board of Education Report- Amendment to the Facilities Services Division Strategic Execution Plan to Approve Project Definitions for 11 Comprehensive Modernization Project. Report. 16/17 ed. Vol. 205. Los Angeles, CA: LAUSD, 2015.
[4] California Public Resources Code, §21000 et seq (1970).
[5] California Code of Regulations, Title 14, Division 6, Chapter 3, §15000 et seq.
[6] California Code of Regulations, Title 14, Division 6, Chapter 3, §15063.

When an Initial Study identifies the potential for significant environmental impacts, the lead agency must prepare an EIR;[7] however, if all impacts are found to be less than significant or can be mitigated to a less than significant level, the lead agency can prepare a ND or MND that incorporates mitigation measures into the project.[8]

1.4 ENVIRONMENTAL PROCESS

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

1) An activity directly undertaken by any public agency including but not limited to public works construction and related activities clearing or grading of land, improvements to existing public structures, enactment and amendment of zoning ordinances, and the adoption and amendment of local General Plans or elements thereof pursuant to Government Code Sections 65100-65700.

2) An activity undertaken by a person which is supported in whole or in part through public agency contacts, grants, subsidies, loans, or other forms of assistance from one or more public agencies.

3) An activity involving the issuance to a person of a lease, permit, license, certificate, or other entitlement for use by one or more public agencies. (California Code of Regulations [CCR] § 15378[a])

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

1.5 INITIAL STUDY

This Initial Study was prepared in accordance with CEQA and the State CEQA Guidelines, as amended, to determine if the Project could have a significant impact on the environment. The purposes of this Initial Study, as described in the State CEQA Guidelines Section 15063, are to (1) provide the lead agency with information to use as the basis for deciding whether to prepare an EIR or MND or ND; (2) enable the lead agency to modify a project, mitigating adverse impacts before an EIR is prepared, thereby enabling the project to qualify for an ND or MND; (3) assist the preparation of an EIR, if one is required; (4) facilitate environmental assessment early in the design of a project; (5) provide documentation of the factual basis for the finding in an MND or ND that a project will not have a significant effect on the environment; (6) eliminate unnecessary EIRs; and (7) determine whether a previously prepared EIR could be used with the project. The findings in this Initial Study have determined that an EIR is the appropriate level of environmental documentation for this Project.

[7] California Code of Regulations, Title 14, Division 6, Chapter 3, §15064.
[8] California Code of Regulations, Title 14, Division 6, Chapter 3, §15070.

1.5.1 Environmental Impact Report

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

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

1.5.2 Tiering

This type of project is one of many that were analyzed in the LAUSD SUP Program EIR that was certified by the LAUSD BOE on November 10, 2015.[9] LAUSD's SUP Program EIR meets the criteria for a Program EIR under CEQA Guidelines Section 15168 (a)(4) as one "prepared on a series of actions that can be characterized as one large project and are related … [a]s individual activities carried out under the same authorizing statutory or regulatory authority and having generally similar environmental effects which can be mitigated in similar ways."

The Program EIR enables LAUSD to streamline future environmental compliance and reduces the need for repetitive environmental studies.[10] The Program EIR serves as the framework and baseline for CEQA analyses of later projects through a process known as "tiering." Under CEQA Guidelines Sections 15152(a) and 15385, "tiering" refers to using the analysis of general matters contained in a broader EIR (such as one prepared for a program) with later EIRs and negative declarations on narrower projects; incorporating by reference the general discussions from the broader EIR; and concentrating the later EIR or negative declaration solely on the issues specific to the later project.[11]

The Program EIR is applicable to all projects implemented under the SUP. The Program EIR provides the framework for evaluating environmental impacts related to ongoing facility upgrade projects planned by the District.[12] Due to the extensive number of individual projects anticipated to occur under the SUP, projects were

[9] *Program EIR for the School Upgrade Program. Report.* 2015. http://achieve.lausd.net/ceqa.
[10] *Program EIR for the School Upgrade Program. Report.* 2015. http://achieve.lausd.net/ceqa.
[11] California Code of Regulations Title 14, § 3 Article 1-15152(a).
[12] Ibid, at 4-8.

grouped into four categories based on project scope, type of construction and location of project. The four categories of projects are as follows:[13]

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

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

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

1.5.3 Project Plan and Building Design

The Project is subject to the California Department of Education (CDE) design and siting requirements, and the school architectural designs are subject to review and approval by the California Division of the State Architect (DSA). The proposed Project, along with all other SUP-related projects, is required to comply with specific design standards and sustainable building practices. Certain standards assist in reducing environmental impacts, such as the California Green Building Code (CALGreen Code),[14] LAUSD Standard Conditions of Approval (SC), and the Collaborative for High-Performance Schools (CHPS) criteria.[15]

California Green Building Code. Part 11 of the California Building Standards Code is the CALGreen Code. The CALGreen Code is a statewide green building standards code and is applicable to residential and nonresidential buildings throughout California, including schools. The CALGreen Code was developed to reduce greenhouse gas (GHG) emissions from buildings; promote environmentally responsible, cost-effective, healthier places to live and work; reduce energy and water consumption; and respond to the environmental directives of the Department of Housing and Community Development.

[13] Ibid, at 1-7.
[14] California Green Building Standards Code, Title 24, Part 11.
[15] The Board of Education's October 2003 Resolution on Sustainability and Design of High Performance Schools directs staff to continue its efforts to ensure that every new school and modernization project in the District, from the beginning of the design process, incorporate CHPS (Collaborative for High Performance Schools) criteria to the extent possible.

1. Introduction

Standard Conditions of Approval for District Construction, Upgrade, and Improvement Projects. SCs were adopted by the BOE on February 5, 2019 (Board Report Number 241-18/19). SCs are environmental standards that are applied to District construction, upgrade, and improvement projects and used by the LAUSD Office of Environmental Health and Safety (OEHS) to offset potential environmental impacts in CEQA analyses. The SCs were largely compiled from established LAUSD design guidelines and standards, best management practices (BMPs), and regulatory requirements and are required to be included in the construction specifications. For each SC, applicability is triggered by factors such as the project type and existing conditions. These SCs are implemented during the planning, construction, and/or operational phases of the projects. It is anticipated that the BOE will adopt updates to the SCs as part of the Subsequent Program EIR for the School Upgrade Program, which is being prepared concurrently to this document. It is expected that the Subsequent Program EIR will be certified prior to the certification of the EIR for the proposed Project; therefore, all SCs referenced in this document reflect those contained in the upcoming Subsequent Program EIR.

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

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

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

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

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

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

The specific CHPS prerequisite criteria and LAUSD SCs are identified in the tables under each CEQA topic.[16] Federal, State, regional, and local laws, regulations, plans, and guidelines; CHPS criteria; PDFs; and SCs are considered part of the Project and are included in the environmental analysis.

1.6 IMPACT TERMINOLOGY

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

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

1.7 ORGANIZATION OF THE INITIAL STUDY

The content and format of this report are designed to meet the requirements of CEQA and the State CEQA Guidelines. The conclusions in this Initial Study are that the proposed Project has the potential to create a significant impact on the environment and that an EIR must be prepared. This report contains the following sections:

Chapter 1, *Introduction* identifies the purpose and scope of the Initial Study and the terminology used.

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

[16] CHPS criteria are summarized. The full requirement can be found at http://www.chps.net/dev/Drupal/California.

1. Introduction

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

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

Chapter 5, *List of Preparers* identifies the individuals who prepared the Initial Study and technical studies and their areas of technical specialty.

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

A Phase I Environmental Site Assessment

B Historic Resource Evaluation Report

C Tree Inventory from Site Analysis & Program Development Report

D Geotechnical Investigation

E Natural History Museum Record Search

F Preliminary Environmental Assessment Equivalent Document

2. Environmental Setting

2.1 PROJECT LOCATION

The approximately 11.2-acre Irving MS campus is located at 3010 W. Estara Avenue (Assessor Parcel Numbers [APNs] 5458-019-900 [main parcel], 5458-018-903 [southwest of Moss Avenue], 5458-018-904, 5458-018-905, 5458-018-906, 5458-018-907, 5458-018-908, 5458-018-909, 5458-018-910, 5458-018-911, 5458-018-912, 5458-018-913, 5458-018-914, 5458-018-915, 5458-018-916, and 5458-018-917) in the community of Northeast Los Angeles (neighborhood of Glassell Park) within the City of Los Angeles in Los Angeles County.[17] Within LAUSD, Irving MS is a part of Region West and the Board District 5, currently represented by Board Member Jackie Goldberg. Regional access to the site is from State Route 2 by exiting on San Fernando Road, traveling northwest on San Fernando Road for approximately 0.2 mile, and then traveling northeast on Fletcher Drive for approximately 0.2 mile (see **Figure 1: Regional Location**).

The Project site is bounded by Fletcher Drive to the northwest, Estara Avenue to the northeast, Marguerite Street to the southeast, West Avenue 32 to the southwest, and residential properties and neighborhood commercial properties in the western corner. Additionally, Moss Avenue and Roswell Street are City-owned streets that run through the Campus and connect Fletcher Drive to Estara Avenue. LAUSD has obtained a revocable permit to occupy the City right-of-way that runs through this portion of the Campus. The proposed Project does not involve any work on the City streets; therefore, the proposed Project site consists of 11.2 acres of the Campus, not including City streets. Regionally, the Project site is approximately 0.01 mile north and approximately 0.1 mile west of State Highway 2, approximately 1.5 miles east of I-5, and approximately 2.6 miles south of State Route 134.

The Campus is located on the U.S. Geological Survey (USGS) 7.5-minute series Los Angeles quadrangle, within a valley between the San Rafael Hills to the north (with elevations of 1,600+ feet above mean sea level [msl]), the hills of Mount Washington to the east (with elevations of 900+ feet above msl), Elysian Heights to the south (with elevations of 650+ feet above msl), and Griffith Park to the west (with elevations of 1,400+ feet above msl; see **Figure 2: Topographic Map**). The Project site is sloped downwards on all sides from the campus core towards the surrounding land uses, with the lowest point in the southernmost corner, and has an elevation that ranges from approximately 390–391 to 415–416 feet above msl.

2.2 SURROUNDING LAND USES

Land uses surrounding the Project site are composed of public facilities, single- and multifamily residential, neighborhood commercial, commercial manufacturing, and limited manufacturing uses (see **Figure 3: Surrounding Land Use**). Fletcher Drive Elementary School is located across Estara Avenue to the northeast, residential uses are located immediately west and across Marguerite Street and Avenue 32 to the southeast and

[17] City of Los Angeles. N.d. ZIMAS. Accessed August 22, 2023. https://zimas.lacity.org/

southwest, State Route (SR) 2 is located across Marguerite Street to the south, and commercial and manufacturing uses are located immediately west (Furniture Fosters and The Stash on York) and across Fletcher Drive to the northwest (The Crème Shop, Mendez Tax Services, Love Your Hair, Julie's Market, Viet on Fletcher, Birds Auto Detail and Ceramic Coatings, R B Signs, Zumba, Fresh Pup Cuts, Los Angeles World Embroidery & School Uniforms, Olivares flower and party shop, and El Ranchito Meat Market).

2.3 SENSITIVE RECEPTORS

LAUSD has defined sensitive receptors as residences, schools, long-term care facilities, dormitories, motels, hotels, transient lodgings, hospitals, libraries, auditoriums, concert halls, outdoor theaters, nature and wildlife preserves, parks, and places of worship.

In addition to students on campus, nearby sensitive receptors in close proximity to the proposed Project include Fletcher Drive Elementary School to the northwest and multi-family residences to the north, east, south, and west (see **Figure 4: Location of Sensitive Receptors**; **Table 1: Sensitive Receptors**). There are 26 single-family residences located approximately 251 to 500 feet south of the Project site; however, as they are located on the opposite side of SR-2, which is located at an approximately 20-foot higher elevation than the project site, the SR-2 wall acts as an existing sound barrier.

Table 1
Sensitive Receptors

No.	Name	Address	Type	Location	Distance from Project Site (feet)
1	Project Site	3010 Estara Ave, Los Angeles, CA 90065	Education	On campus	0
2	Fletcher Drive Elementary School	3350 Fletcher Drive	Education	Northeast, across Estara Avenue	59
3	Multi-family Residential	Multiple addresses along W Avenue 32	Residential	Immediately west of campus	0-26
4	Multi-family Residential	Multiple addresses along Estara Avenue, Fletcher Drive, Andrita Street, and W Avenue 32	Residential	North of Fletcher Drive	155-500
5	Multi-family Residential	Multiple addresses along W Avenue 34	Residential	Northeast of W Avenue 34	365-500
6	Multi-family Residential	Multiple addresses along Estara Avenue and Marguerite Street	Residential	Southeast of Marguerite Street	60-500
7	Multi-family Residential	Multiple addresses along W Avenue 32, Fletcher Drive, and Delay Drive	Residential	Southwest of W Avenue 32	86-350

2.4 CAMPUS HISTORY

Irving MS has been in operation as a school since 1937.[18] The site was undeveloped land as early as the late 1800s and was primarily developed with residences and associated structures through the 1900s (see Appendix A, *Phase I ESA*). The Project site was originally the location where Andrew Glassell built his "Ranch House" in 1889 on the land he purchased from the 36,403-acre Rancho San Rafael tract.[19, 20] Andrew Glassell (1827–1901) was an American real estate attorney and investor from Virginia who was named the first president of the Los Angeles Bar Association; after his death, the Glassell family began selling some of the property, leading to subdivisions in the community that is now called Glassell Park. The land was originally surrounded by citrus orchards and walnut groves. The orchards and groves along with the surrounding areas would eventually be transformed into residential tract made up of individually designed bungalow residences. By the 1930s, two streets and commercial properties were added, and portions of the existing school were developed on the northern portion in 1936 and 1937. In 1936, the City purchased Glassell's ranch house through eminent domain to establish Irving MS, which included the following buildings: Administration Building (1937); Auditorium (1939); Physical Education Building (1937); Cafeteria (1938); and two-unit shops that were constructed between 1936 and 1939 (**Table 2: Character-Defining Historic District Eligible Campus Buildings**).[21] The Irving MS campus core was constructed from 1936 to 1939 in the architectural era of Public Works Administration (PWA) Moderne.[22] In the 1930s, PWA funding helped buoy school construction during the Great Depression.[23] According to the Historic Resource Evaluation Report (HRER) for the Project site, the Administration Building, Auditorium, and the Physical Education Building were designed by Edwin L. Bergstrom and the Cafeteria along with the two-unit shops were designed by Alfred S. Nibecker, Jr. (see Appendix B). The buildings by Bergstrom "exhibit character-defining features associated with PWA Moderne architecture, with elements of Streamline Moderne style."[24] In the 1940s and again in the 1980s, the school expanded by taking over adjacent residential properties. A third Shop Building was built in 1955, the one-story Classroom and Homemaking Buildings were built in 1956, six bungalow classrooms were added to the campus from 1947 to 1970, the two-story Classroom Building was built in 1990, and the Sanitary Building was built in 2004.[25] Additional structures have been developed onsite, and the existing structures and configuration of the site have been present since 2004. Today, the Project site continues to be surrounded predominantly by multi-family residential with some single-family residential, commercial, industrial, and public facilities (see **Figure 5:**

[18] California Department of Education. August 17, 2023. "California School Directory - Washington Irving Middle School Math, Music and Engineering Magnet." https://www.cde.ca.gov/schooldirectory/details?cdscode=19647336058077
[19] Los Angeles Unified School District. August 2022. Historic Resource Evaluation Report.
[20] United States Department of the Interior National Park Service. April 13, 2007. National Register of Historic Places Continuation Sheet. Glassell park Elementary School. https://npgallery.nps.gov/GetAsset/aadbdf39-2ca0-4a3f-9f77-2c367a27f5b6/
[21] Los Angeles Unified School District. August 2022. Historic Resource Evaluation Report.
[22] Los Angeles Unified School District. August 2022. Historic Resource Evaluation Report.
[23] Prepared by Sapphos Environmental, Inc. for the Los Angeles Unified School District Office of Environmental Health and Safety. March 2014. Los Angeles Unified School District Historic Context Statement, 1870 to 1969. https://planning.lacity.org/odocument/5a14c032-614e-4cd2-b58a-9507df31fbd1/Los%20Angeles%20Unified%20School%20District%20Historic%20Context%2C%201870-1969.pdf
[24] Los Angeles Unified School District. August 2022. Historic Resource Evaluation Report.
[25] NAC Architecture for Los Angeles Unified School District. February 3, 2023. Irving Steam Magnet Middle School Site Analysis and Development Report.

Existing Site Plan and Context Photos and **Figure 6: Character-Defining Historic District Eligible Campus Buildings**).

Table 2
Character-Defining Historic District Eligible Campus Buildings

Building ID	Building Name	Year Built	Historic Contributor/ Noncontributor	Assembly Bill (AB) 300[1]
15553	Administration Building	1937	Contributor	Yes – insufficient seismic gaps, overstressed shear walls, and diaphragm openings that are too large
14626	Physical Education Building	1937	Contributor	Yes – overstressed shear walls and insufficient wall anchorage at the diaphragm
17203	Cafeteria	1938	Contributor	No
17042	Auditorium	1939	Contributor	Yes – insufficient wall anchorage and diagonal sheathing at the diaphragm
16011	Shop No. 1	1937	Contributor	No
16601	Shop No. 2	1937	Contributor	No

1 State of California. Amended April 5, 1999. AB 300. http://www.leginfo.ca.gov/pub/99-00/bill/asm/ab_0251-0300/ab_300_bill_19991010_chaptered.html

2.5 EXISTING CONDITIONS

The proposed Project site is an educational facility that primarily serves Grades 6 through 8 (middle school) through a STEAM[26] Magnet Program with approximately 815 students enrolled in the program (**Table 3: 2023–2024 Campus Enrollment**). However, the Campus hosts a number of specialized instructional programs in addition to the STEAM Magnet Program, Isana Octavia Charter (kindergarten [K] through 8th grade), and City of Angels Community School (K through 12th grade). In total, the Campus currently has an enrollment of approximately 1,100 students.[28]

[26] Science, technology, engineering, art, and mathematics
[28] California Department of Education. N.d. School Profile: Washington Irving Middle School Math, Music and Engineering Magnet. https://www.cde.ca.gov/sdprofile/details.aspx?cds=19647336058077 Accessed November 2, 2023.

Table 3
2023–2024 Campus Enrollment

School Program	Grades	Enrollment
Washington Irving Middle School Math, Music and Engineering Magnet[1]	6–8	698
ISANA Octavia Academy[2]	K–8	375
City of Angels Community School[3]	K–12	~30

1 California Department of Education. N.d. School Profile: Washington Irving Middle School Math, Music and Engineering Magnet. https://www.cde.ca.gov/sdprofile/details.aspx?cds=19647336058077 Accessed November 2, 2023.

2 California Department of Education. N.d. School Profile: ISANA Octavia Academy. https://www.cde.ca.gov/sdprofile/details.aspx?cds=19647330122655 Accessed November 2, 2023.

3 Enrollment estimate based on one student classroom capacity.

Irving MS is an irregularly shaped campus split by two vacated City streets on an approximately 11.2-acre parcel, with 11 permanent buildings comprising 57 classrooms and six portable buildings comprising 11 classrooms (see Figure 5). The main entrance gate to the Campus is located on the northeastern side, along Estara Avenue between the Administration Building and the Auditorium. The Campus site is bisected by two main walking paths. The first main walking path runs east-west across campus and connects an entrance on Marguerite Avenue to Moss Avenue. Both ends of this walking path serve as drop-off points for pedestrians. The second main walking path starts at the Main Pedestrian Gate entrance on Estara Avenue and runs southwest to the Physical Education Building. The buildings are oriented inwardly, away from the streetscape, to face walkways, parking lots, courtyards, and the playing field at the south end of the campus at the corner of West Avenue 32 and Marguerite Street. Another playing field at the corner of Fletcher Drive and Estara Avenue, paved recreation areas, and storage containers occupy the rectangular area formed by the former Moss Avenue and the former Roswell Street, both of which have been incorporated into the Campus property. The Campus contains a natural grass athletic field at the northern corner, adjacent to eight asphalt basketball courts near Fletcher Drive. At the southern end of Campus, an artificial turf soccer field surrounded by a track is located adjacent to seven additional asphalt basketball courts along Marguerite Street, with additional physical education facilities to the east of the soccer field, between the Physical Education Building and Marguerite Street. On-site parking can be accessed from the former/abandoned Roswell Street easement, which provides parking on both sides and Special Education (SPED) bus pick-up and drop-off in front of the Cafeteria Building, as well as the former/abandoned Moss Avenue. There are five pick-up/drop-off zones located on campus. There is a Magnet and afterschool program pick-up/drop-off zone located on W Avenue 32, a Charter School pick-up/drop-off zone located on Marguerite Street with an entrance at Octavia Gate, an Irving MS pick-up/drop-off zone at the Pedestrian Gate on Marguerite Street, a Charter School pick-up/drop-off zone off Fletcher Drive, and an Irving MS pick-up/drop-off zone at the Main Gate entrance.

In addition to the four original campus buildings on the eastern half of Campus, there are several shops and classroom buildings at the west side of Campus. On the southeast side of Campus off Marguerite Street is a complex of new classroom buildings, southeast of the Administration Building and between the Auditorium and the Physical Education Building. Although major elements of the exteriors of the original Campus buildings are vertically oriented, the composition of the façades also emphasizes horizontality, a characteristic identified

in the LAUSD Historic Context Statement as associated with Streamline Moderne/Moderne architecture. All of the original buildings are constructed of reinforced cast concrete. In the case of the Bergstrom-designed buildings, the exterior walls display a prominent horizontal board-form texture, and heavy fluted cast plaster pilasters flank entrances and are highlighted by a paint palette of royal blue contrasting with stark white exterior walls. All of the major original Campus buildings have flat parapets and horizontal stringcourses encircling the exteriors a few feet below the parapet and stringcourses above and below the windows, creating a horizontal look in contrast with the verticality of the pilasters.

The proposed Project site is located entirely within an Alquist Priolo Earthquake Fault Zone, with the Hollywood Fault and the Raymond Fault running beneath the Campus, as mapped by the California Geological Survey.[28] The Hollywood Fault is estimated to be located in the southern corner of the Campus running west beneath the New Classroom Building and the Soccer Field; the Raymond Fault is estimated to be located in the north corner of the site running west beneath the Athletic Field; and a postulated fault is estimated to run west beneath the Homemaking Building, Classroom Building, Administration Building, and six bungalows. The proposed Project is being undertaken to alleviate existing structural and seismic deficiencies in Campus buildings and to address the risks associated with the postulated fault. In addition to potential for fault rupture, three buildings on Campus (Administration Building, Auditorium, and Physical Education Building) have been found to have structural deficiencies.[29] The Administration Building has insufficient seismic gaps, overstressed shear walls, and diaphragm openings that are too large. The Auditorium has insufficient wall anchorage and diagonal sheathing at the diaphragm. The Physical Education Building was found to have overstressed shear walls and insufficient wall anchorage at the diaphragm. These buildings' existing structural deficiencies currently pose greater risks of loss, injury, or death than other buildings if fault rupture were to occur. The proposed Project would reduce the potential for students and faculty to be exposed to rupture of the known earthquake fault by replacing the removed buildings with new construction at least 50 feet away from the known fault.

The buildings on the Campus range in condition from good to critical.[30] Most of the buildings are in poor condition. The Homemaking Building, Cafeteria, New Classroom Building, and Shop Building #2 are all in critical condition, with HVAC and Fire Protection being the primary concerns cited in the Facilities Condition Index as well as by the site observation team. Assembly Bill (AB) 300, enacted in 1999, required the State of California Department of General Services to survey the State's public school buildings (grades K–12) for earthquake safety and to submit a report of its findings to the Legislature.[31] Since 2006, 667 of LAUSD's buildings have been identified for seismic evaluation based upon AB 300 criteria and LAUSD's higher standards. Since that time, seismic evaluations have been performed on school buildings identified to be the most seismically vulnerable, and projects have been developed to address the buildings determined to be in the greatest need of structural upgrades. The three buildings on the AB 300 list (Administration Building, Auditorium, and Physical Education Building) have all been found to have structural deficiencies (see Table 2).

[28] California Department of Conservation, California Geological Survey. N.d. Earthquake Zones of Required Investigation https://maps.conservation.ca.gov/cgs/EQZApp/app/ (accessed August 17, 2023)
[29] NAC Architecture for Los Angeles Unified School District. February 3, 2023. Irving Steam Magnet Middle School Site Analysis and Development Report.
[30] NAC Architecture for Los Angeles Unified School District. February 3, 2023. Irving Steam Magnet Middle School Site Analysis and Development Report.
[31] Los Angeles Unified School District. N.d. Seismic Safety of School Buildings. https://www.lausd.org/Page/18943 Accessed November 2, 2023.

The Administration Building has insufficient seismic gaps, overstressed shear walls and diaphragm openings that are too large. The Auditorium has insufficient wall anchorage and diagonal sheathing at the diaphragm. The Physical Education Building was found in the Site Analysis and Development Report to have overstressed shear walls and insufficient wall anchorage at the diaphragm. The Physical Education Building and the Administration Building are both located in a fault zone. The Classroom Building, Homemaking Building, New Classroom Building, Shop Building #2 and all six bungalow classrooms are also located in the fault.

The site topography has 20 feet of grade change across the campus. It slopes from south to north with the lowest point in the southernmost corner. The highest point is in the middle of the campus at the Administration Building and Cafeteria. There are multiple terraces, stairs, and ramps to mitigate these grade differences. Some of these ramps are accessibility upgrades that have been made over the years and contribute to the disconnected nature of the exterior spaces.

2.6 GENERAL PLAN AND EXISTING ZONING

The Project site is designated by the City General Plan and the Northeast Community Plan as "Junior High School – Public" with a "Public Facilities" land use designation (see **Figure 7: General Plan Land Use Designation Map**),[32] and it is zoned "Public Facilities" (PF) (see **Figure 8: Zoning Designation Map**).[33] Both the Northeast Los Angeles Community Plan and the City zoning code permit public secondary schools in the Public Facilities designations.[34,35] Public Facilities is the designation for the use and development of publicly owned land in order to implement the City's adopted General Plan, including, the circulation and service systems designations in the City's adopted district and community plans, and other relevant General Plan elements, including the circulation, public recreation and service systems elements.[36] Under the proposed Project, the use of the land falls under public secondary schools, which is allowed by the PF zoning designation. As allowed per Government Code Section 53094, in 2019 the LAUSD Board of Education adopted a resolution to exempt all LAUSD school sites from local land use regulations.[37]

2.7 NECESSARY APPROVALS

It is anticipated that approval required for the proposed Project would include, but may not be limited to, those listed below.

[32] City of Los Angeles. June 25, 2014. "General Plan Land Use Map – Northeast Los Angeles Community Plan." https://planning.lacity.org/plans-policies/community-plan-area/north-los-angeles
[33] City Zone Information and Map Access System (ZIMAS). http://zimas.lacity.org/. Accessed August 29, 2023.
[34] City of Los Angeles. Amended September 7, 2016. "Northeast Los Angeles Community Plan." https://planning.lacity.org/plans-policies/community-plan-area/north-los-angeles
[35] City of Los Angeles. Municipal Code, Chapter 1, Section 12.04.09 "PF" Public Facilities Zone. "https://codelibrary.amlegal.com/codes/los_angeles/latest/lapz/0-0-0-1548 (accessed April 23, 2023)
[36] American Legal Publishing. Effective June 30, 1991. Los Angeles Municipal Code. Section 12.04.09. "PF" Public Facilities Zone. https://codelibrary.amlegal.com/codes/los_angeles/latest/lapz/0-0-0-1548 (accessed August 29, 2023)
[37] LAUSD. 2019. Board of Education Report. 18/19 ed. Vol. 256.

2. Environmental Setting

Responsible Agencies
A "Responsible Agency" is defined as a public agency other than the lead agency that has discretionary approval power over a project (CEQA Guidelines §15381). The Responsible Agencies, and their corresponding approvals, for individual projects to be implemented as part of the SUP may include the following:

- California Department of General Services, Division of State Architect. Approval of site-specific construction drawings.
- Los Angeles Regional Water Quality Control Board. General Construction Activity Permit, including the Storm Water Pollution Prevention Plan.
- City of Los Angeles Public Works Department. Permit for curb, gutter, and other offsite improvements.
- City of Los Angeles Fire Department. Approval of plans for emergency access and emergency evacuation.
- City of Los Angeles Department of Building & Safety. Approval of haul route.

Trustee Agencies
"Trustee Agencies" include those agencies that do not have discretionary powers, but that may review the EIR for adequacy and accuracy. Potential Reviewing Agencies for individual projects to be implemented under the SUP may include the following:

State

- California Office of Historic Preservation
- California Department of Transportation
- California Resources Agency
- California Department of Conservation
- California Department of Fish & Wildlife
- Native American Heritage Commission
- State Lands Commission
- California Highway Patrol

Regional

- Metropolitan Transportation Authority
- South Coast Air Quality Management District
- Southern California Association of Governments

Local

- City of Los Angeles Department of Planning
- City of Los Angeles Police Department
- City of Los Angeles Department of Water and Power
- City of Los Angeles Department of Recreation and Parks
- City of Los Angeles Department of Environmental Affairs

Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code Section 21080.3.1?

Note: Conducting consultation early in the CEQA process allows tribal governments, lead agencies, and Project proponents to discuss the level of environmental review, identify and address potential adverse impacts to tribal cultural resources, and reduce the potential for delay and conflict in the environmental review process (see PRC Section 21083.3.2). Information may also be available

from the California Native American Heritage Commission's Sacred Lands File per PRC Section 5097.94 and the California Historical Resources Information System administered by the California Office of Historic Preservation. Please also note that PRC Section 21082.3(c) contains provisions specific to confidentiality.

Pursuant to Assembly Bill 52 (AB 52), LAUSD notified the Native American tribes/tribal representatives that are traditionally and culturally affiliated with the Project area. No Native American tribes have requested consultation with LAUSD, pursuant to Public Resources Code Section 21080.3.1. LAUSD OEHS contacted the Native American Heritage Commission (NAHC) regarding all of the Major Modification Projects. NAHC provided the list of tribes affiliated within the area of all seven of the Major Modernization Projects: Barbareño/Ventureño Band of Mission Indians, Chumash Council of Bakersfield, Coastal Band of the Chumash Nation, Fernandeño Tataviam Band of Mission Indians, Gabrieleño Band of Mission Indians – Kizh Nation (two contacts), Gabrieleño/Tongva San Gabriel Band of Mission Indians, Gabrielino/Tongva Nation, Gabrielino Tongva Indians of California Tribal Council (two contacts), Gabrielino-Tongva Tribe (two contacts), Northern Chumash Tribal Council, San Fernando Band of Mission Indians, Santa Rosa Band of Cahuilla Indians, Santa Ynez Band of Chumash Indians (four contacts), and Soboba Band of Luiseno Indians. On August 25, 2023, letters requesting consultation were sent via email to all tribes listed above. Tribes had 30 days to request consultation regarding any or all of the Projects. The 30-day period has ended, and no requests were received.

2. Environmental Setting

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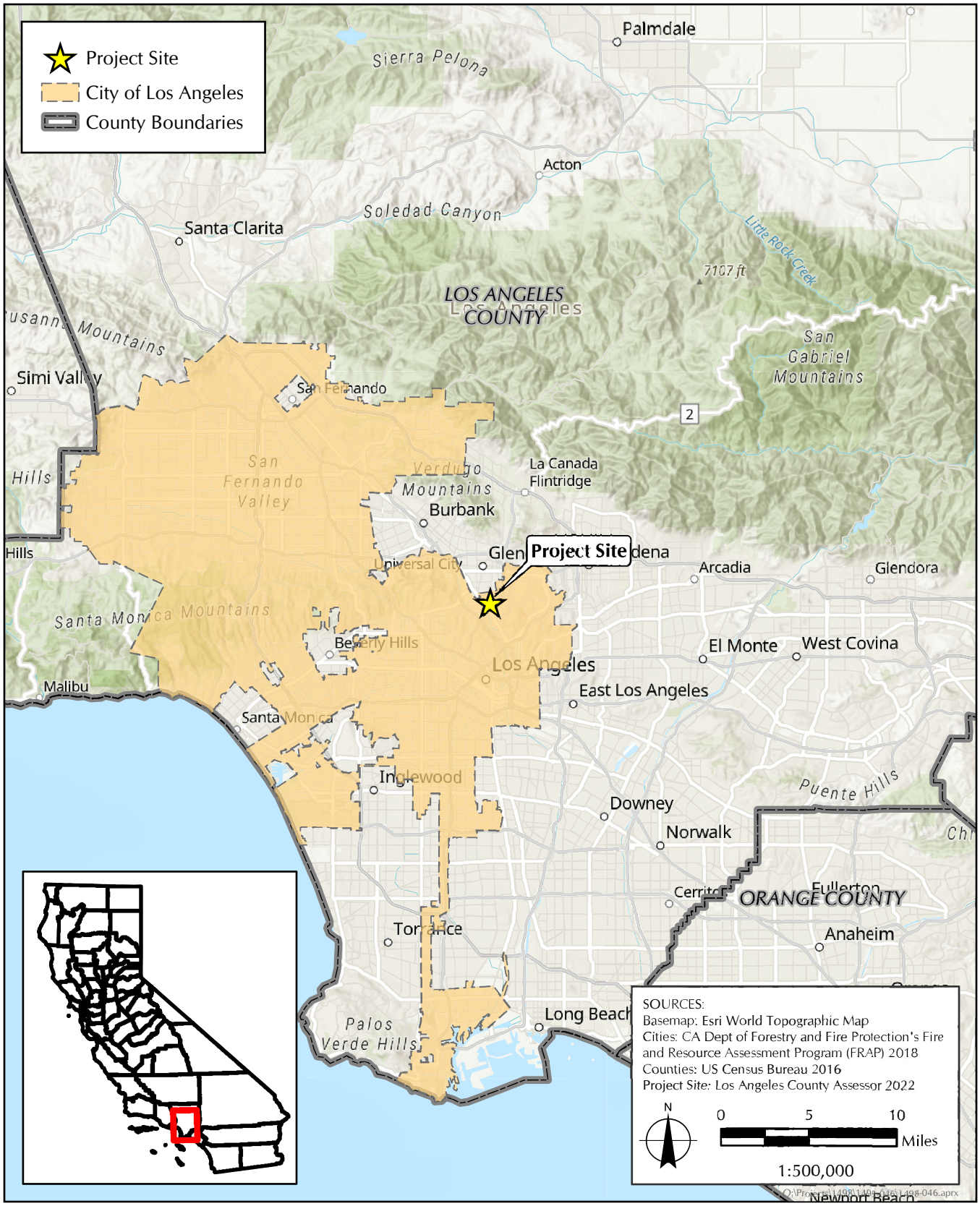

FIGURE 1

Regional Location

2. Environmental Setting

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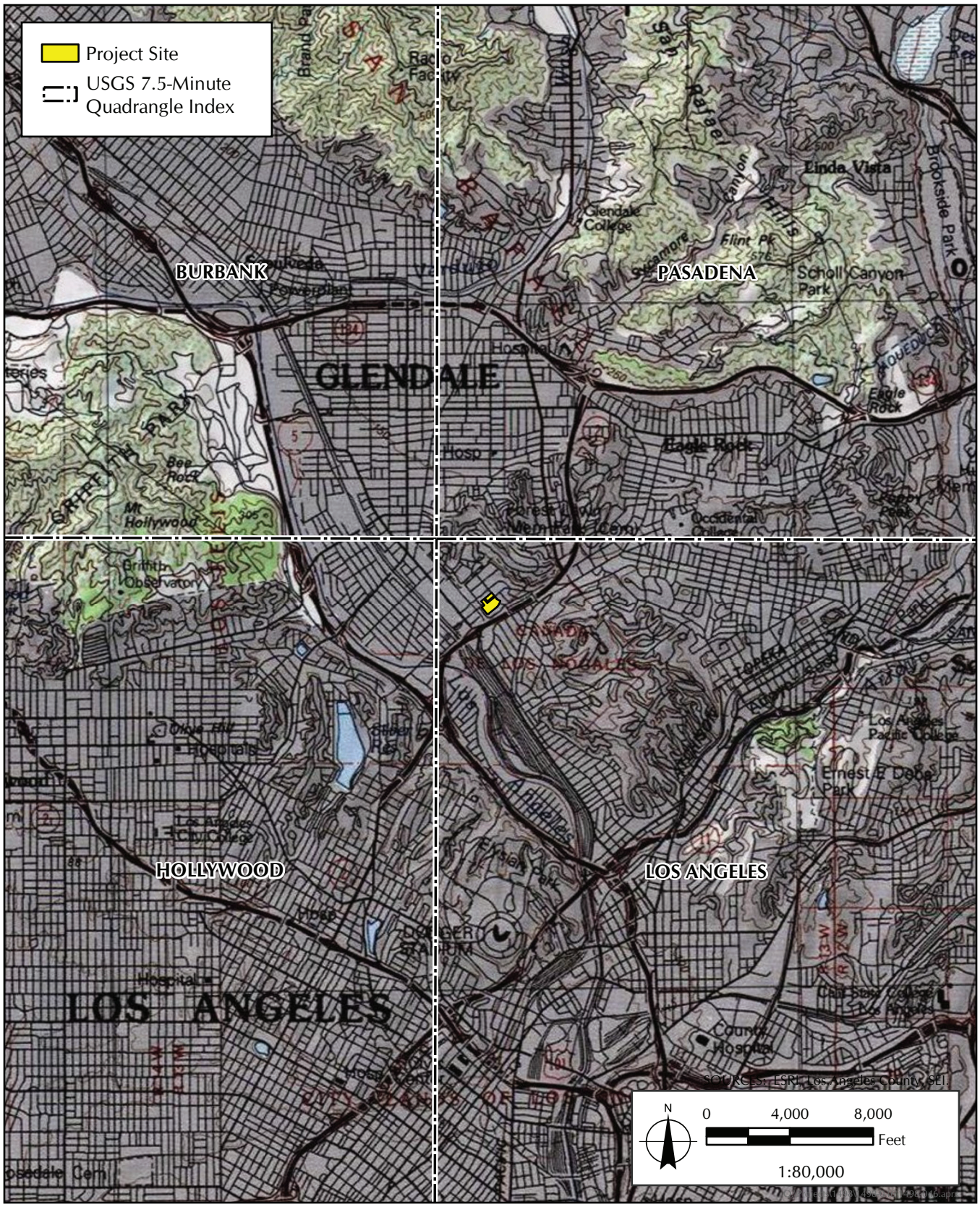

FIGURE 2

Topographic Map

2. Environmental Setting

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FIGURE 3

Surrounding Land Use

2. Environmental Setting

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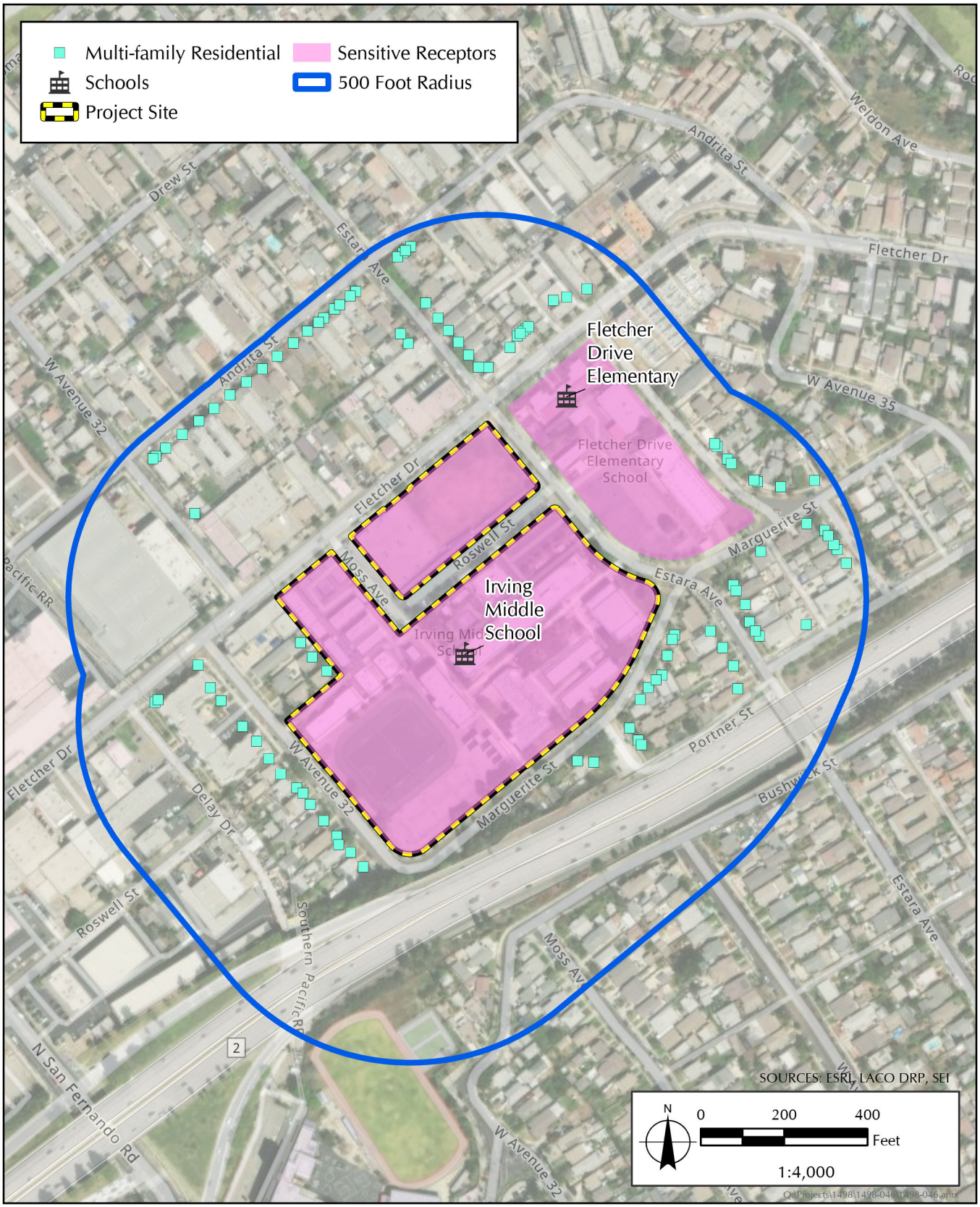

FIGURE 4

Location of Sensitive Receptors

2. Environmental Setting

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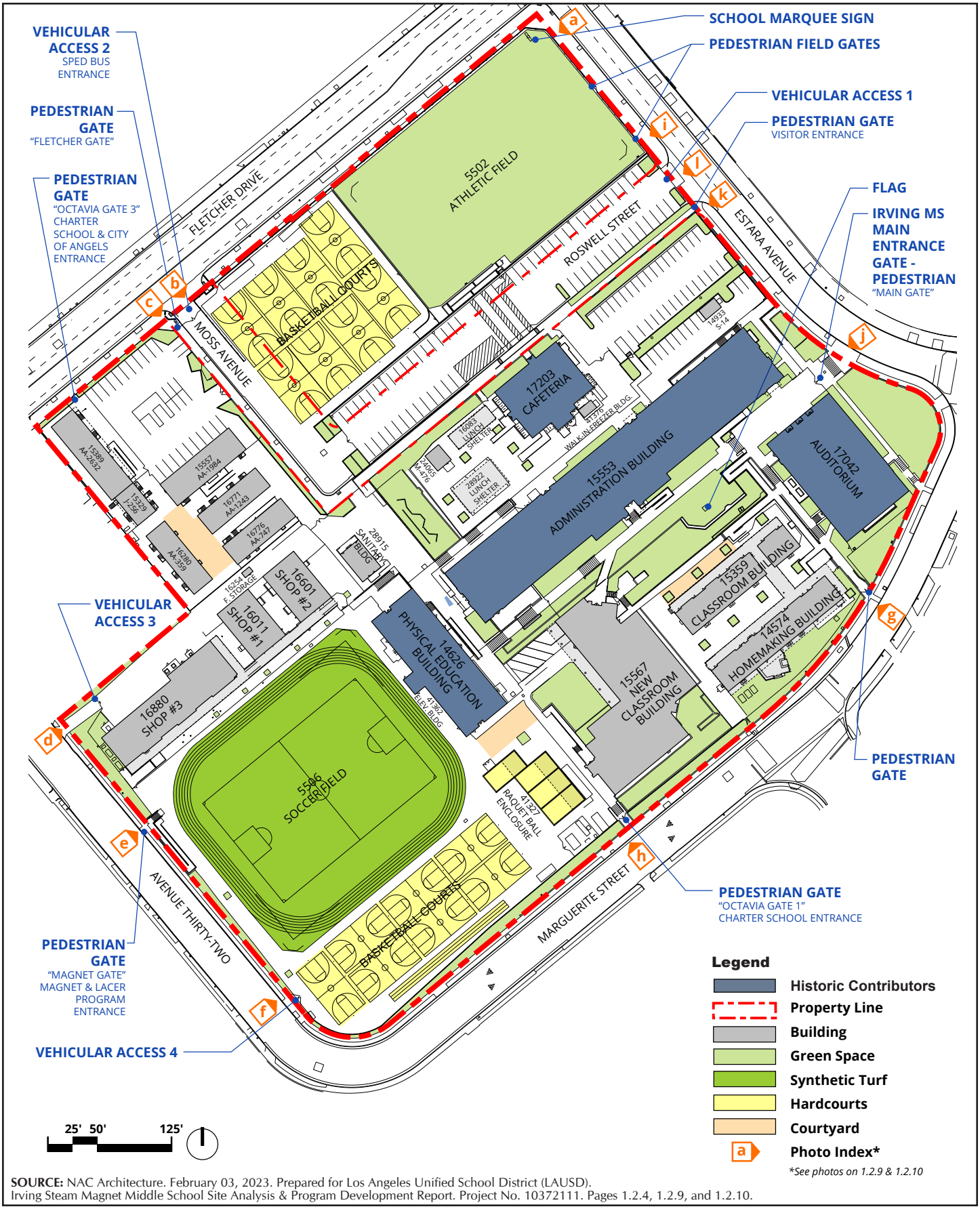

SOURCE: NAC Architecture. February 03, 2023. Prepared for Los Angeles Unified School District (LAUSD). Irving Steam Magnet Middle School Site Analysis & Program Development Report. Project No. 10372111. Pages 1.2.4, 1.2.9, and 1.2.10.

FIGURE 5
Existing Site Plan and Context Photos

a: View of athletic field at corner of Fletcher Drive and Estara Ave. Looking south.

b: Gate at Moss Ave off of Fletcher drive. Looking southeast. (Vehicular Access 2)

c: Pedestrian gate off of Fletcher Drive. Looking southeast. (Octavia Gate 3 - Pedestrian)

d: View of the Shop Buildings from 32 Ave. Looking northeast. (Vehicular Access 3)

e: Gate south of the soccer field of off 32 Ave. (Magnet Gate - Pedestrian)

f: Gate on 32 Ave. by basketball courts at south end of the campus. (Vehicular Access 4)

SOURCE: NAC Architecture. February 03, 2023. Prepared for Los Angeles Unified School District (LAUSD).
Irving Steam Magnet Middle School Site Analysis & Program Development Report. Project No. 10372111. Pages 1.2.4, 1.2.9, and 1.2.10.

FIGURE 5
Existing Site Plan and Context Photos

g: Pedestrian gate on Marguerite St between the Homemaking and Auditorium Buildings.

h: View of Charter school entrance from Marguerite St, Looking northwest. (Octavia Gate 1 - Pedestrian)

i: Pedestrian gates on Estara Ave. for Athletic Field access.

j: Original main entrance of off Estara Ave. Admin bldg is in the background. (Main Gate - Pedestrian)

k: View of main pedestrian gate from Estara Ave. Looking southwest.

l: View of parking entrance gate of off Estara Ave. Looking southwest. (Vehicular Access 1)

SOURCE: NAC Architecture. February 03, 2023. Prepared for Los Angeles Unified School District (LAUSD).
Irving Steam Magnet Middle School Site Analysis & Program Development Report. Project No. 10372111. Pages 1.2.4, 1.2.9, and 1.2.10.

FIGURE 5
Existing Site Plan and Context Photos

2. Environmental Setting

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Administration Building, 1937

Auditorium, 1939

Physical Education, 1937

Cafeteria, 1938

SOURCE: NAC Architecture. February 03, 2023. Prepared for Los Angeles Unified School District (LAUSD).
Irving Steam Magnet Middle School Site Analysis & Program Development Report. Project No. 10372111. Page 2.5.2.

FIGURE 6
Character-Defining Historic District Eligible Campus Buildings

2. Environmental Setting

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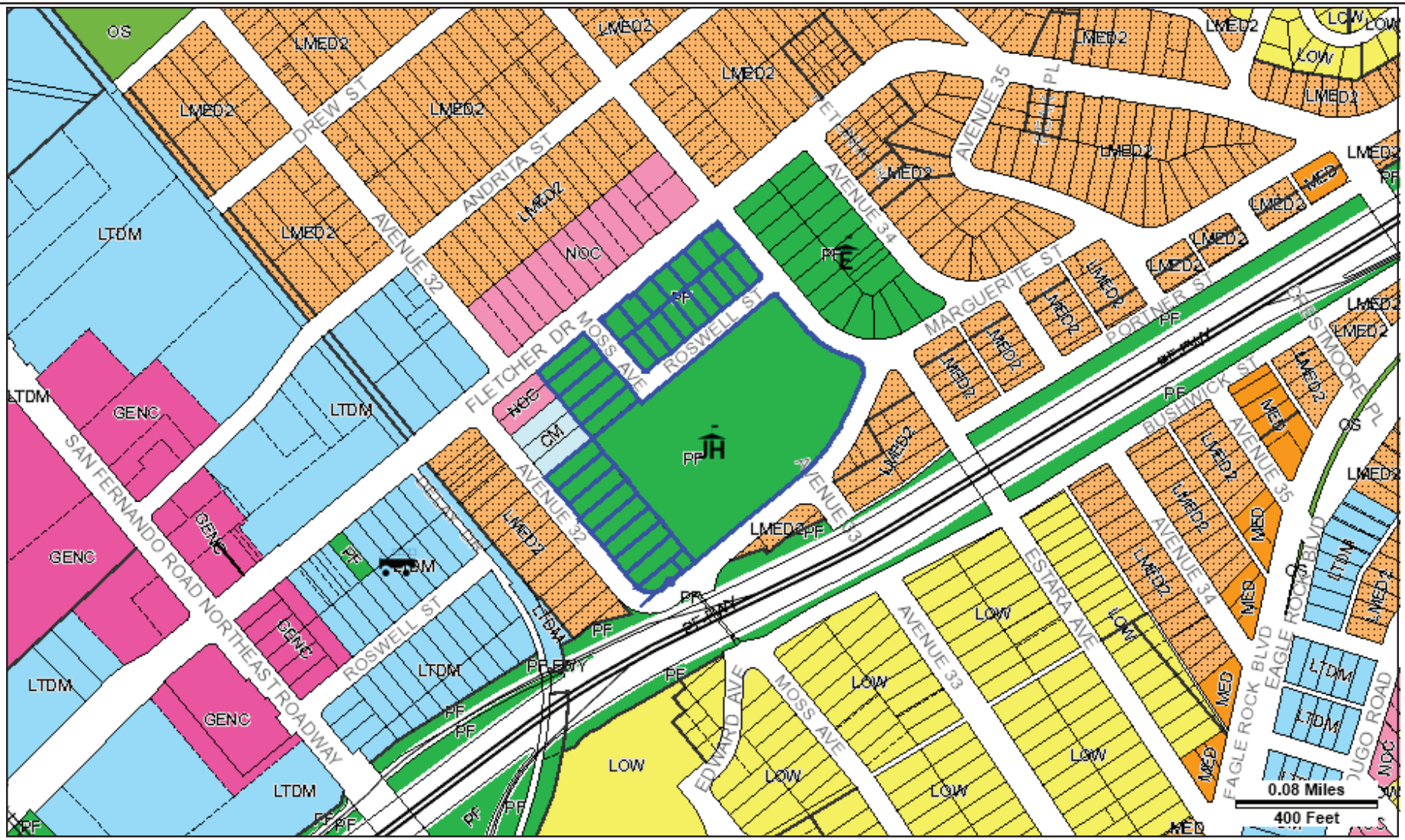

Address: undefined
APN: 5458019900
PIN #: 153A213 42

Tract: TR 575
Block: None
Lot: FR 116
Arb: None

Zoning: PF-1-CDO
General Plan: Public Facilities

SOURCE: City of Los Angeles. July 11, 2023. ZIMAS. General Plan Land Use Background Map Display Layer. Available at: https://zimas.lacity.org/

FIGURE 11
General Plan Land Use Designation Map

2. Environmental Setting

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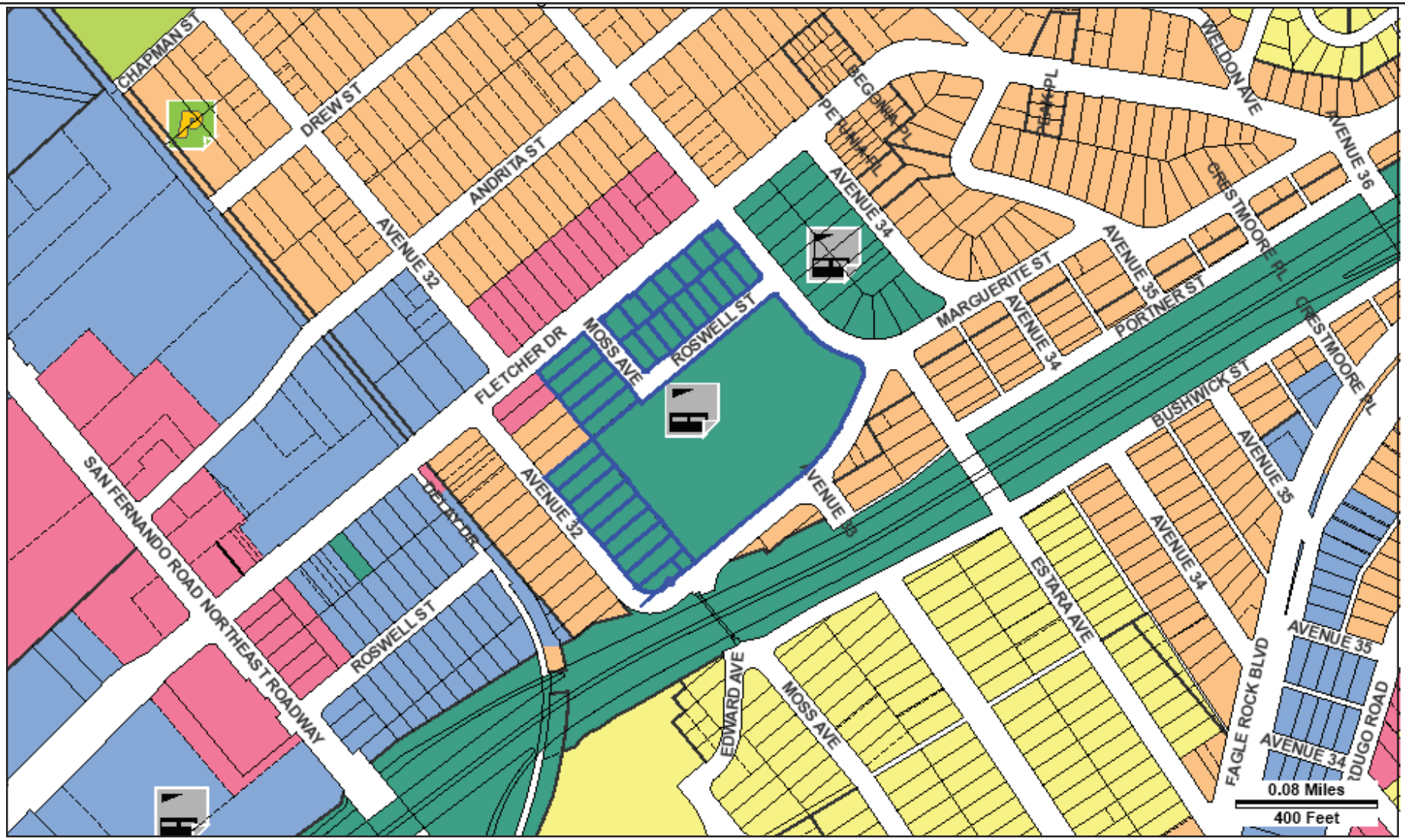

Address: undefined
APN: 5458019900
PIN #: 153A213 42

Tract: TR 575
Block: None
Lot: FR 116
Arb: None

Zoning: PF-1-CDO
General Plan: Public Facilities

SOURCE: City of Los Angeles. July 11, 2023. ZIMAS. Generalized Zoning Background Map Display Layer. Available at: https://zimas.lacity.org/

FIGURE 8
Zoning Designation Map

2. Environmental Setting

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3. Project Description

3.1 BACKGROUND

Purpose and Need for the Project. On August 24, 2021, the Board of Education (Board) adopted an update to the SUP (SUP Program EIR certified by the Board on November 10, 2015) to integrate Measure RR funding and priorities into its operational framework, and it approved the Measure RR Implementation Plan to help guide the identification of sites and development of project proposals. The goal of the LAUSD SUP is to improve student health, safety, and education through the modernization of school facilities. The proposed Project has been developed under the LAUSD's SUP to provide Measure RR funding to give every student access to safe, secure, and updated schools. Irving MS was identified as one of five schools in the District most in need of an upgrade due to the physical condition of the facilities.[38] The primary objective of the proposed Project is to address the most critical physical conditions and essential safety of the site, which includes alleviating seismic and structural risks discovered on the Campus.

Four objectives have been established for the SUP and will aid decision makers in their review of the Project and associated environmental impacts:

1. Repair aging schools and improve student safety.
2. Upgrade schools to modern technology and educational needs.
3. Create capacity to attract, retain, and graduate more students through a comprehensive portfolio of small, high-quality pre-K through adult schools.
4. Promote healthier environment through green technology.

The three buildings on the AB 300 list (Administration Building, Auditorium, and Physical Education Building) have all been found to have structural deficiencies (see Table 2). The Administration Building has insufficient seismic gaps, overstressed shear walls and diaphragm openings that are too large. The Auditorium has insufficient wall anchorage and diagonal sheathing at the diaphragm. The Physical Education Building was found in the Site Analysis and Development Report to have overstressed shear walls and insufficient wall anchorage at the diaphragm. The Physical Education Building and the Administration Building are both located in a fault zone. The Classroom Building, Homemaking Building, New Classroom Building, Shop Building #2 and all six bungalow classrooms are also located in the fault.

[38] Los Angeles Unified School District. November 15, 2022 Board of Education Report (File #: Rep-074-22/23). Approve the Redefinition of Five Major Modernization Projects at 49th Street Elementary School, Canoga Park High School, Garfield High School, Irving Middle School, and Sylmar Charter High School, and Amend the Facilities Services Division Strategic Execution Plan to Incorporate Therein.

Goals. The District has established six core principles/objectives for the scoping of major modernization projects. The core principles of major modernization project scoping are as follows:[39]

1. Buildings meeting AB 300 criteria for seismic evaluation may be addressed, to the extent feasible, with a focus on those determined to have a high seismic vulnerability, through retrofit, removal, or seismic modernization, which will be determined based on an assessment of the seismic vulnerability of the building(s), the historic context of the building/site, actual or potential impact to the learning environment, site layout, and the approach that best ensures compliance with Division of the State Architect (DSA) requirements.

2. The buildings, grounds, and site infrastructure that have significant/severe physical conditions that already do or are highly likely in the near future to pose a health and safety risk, or negatively impact a school's ability to deliver the instructional program and/or operate may be addressed by repair or replacement.

3. The District reliance on relocatable buildings, especially for K–12 instruction, should be reduced.

4. Necessary and prioritized upgrades must be made throughout the school site in order to comply with the program accessibility requirements of the Americans with Disabilities Act (ADA) Title II Regulations, and the District's Self-Evaluation and Transition Plan under Title II of the ADA.

5. The exterior conditions of the school site will be enhanced around new buildings and/or areas impacted by construction to improve the visual appearance including landscape and hardscape.

6. Outdoor learning environments will be developed where the site layout and project planning provide the opportunity.

The proposed Project would substantially modernize the Irving MS campus. The Project would be completed under LAUSD's SUP. As such, the goals of the Project are consistent with the SUP's goal to build, modernize, and repair school facilities to improve student health, safety, and educational quality (per the SUP Program EIR certified by the Board on November 10, 2015).

3.2 PROPOSED PROJECT

The proposed Project involves building replacement and reconfiguration on the Irving MS campus as part of the update to the SUP. The scope consists of the modernization of the campus to facilitate a safe and secure campus that is better aligned with the current instructional program and meets current DSA requirements and educational specifications. Structurally vulnerable buildings located on an identified earthquake fault will be demolished and replaced by a new building that will improve educational quality and safety for students and staff. The proposed Project also includes essential upgrades including seismic retrofit of the Auditorium Building outside of the earthquake fault, the removal of barriers and other accessibility upgrades, and various

[39] Los Angeles Unified School District. November 15, 2022 Board of Education Report (File #: Rep-074-22/23). Approve the Redefinition of Five Major Modernization Projects at 49th Street Elementary School, Canoga Park High School, Garfield High School, Irving Middle School, and Sylmar Charter High School, and Amend the Facilities Services Division Strategic Execution Plan to Incorporate Therein.

landscape and hardscape improvements. The Project will reduce the total number of standard classrooms on the campus from 65 to 46 to accommodate the long-term needs of the school and community, while providing additional outdoor learning and gathering spaces for its students.

3.2.1 Campus Improvements

The proposed Project would include the changes to the Campus Buildings shown in **Table 4: Proposed Project (Demolition, Removal, and Construction)**, **Figure 9: Proposed Project Site Plan**, and **Figure 10: Demolition Plan**.

Table 4
Proposed Project (Demolition, Removal, and Construction)

Bldg. No.	Building	Building Type	Demolition	Removal	New Construction	Remodel/ Seismic Retrofit	Existing to Remain
14574	Homemaking Building	Permanent	4,432				
14626	Physical Education Building	Permanent					15,776
14933	S-14	Portable - Service		255			
15329	J-256 Relocatable Building	Portable - Sanitary		902			
15359	Classroom Building	Permanent	4,061				
15389	AA-2632 Relocatable Building	Portable - Bungalow		2,774			
15553	Administration Building	Permanent	53,949				
15557	AA-1984 Relocatable Building	Portable - Bungalow		2,555			
15567	90's Classroom Building	Permanent					29,084
16011	Shop #1	Permanent					3,000
16254	Flammable Storage	Permanent					45

3. Project Description

Table 4

Proposed Project (Demolition, Removal, and Construction)

Bldg. No.	Building	Building Type	Demolition	Removal	New Construction	Remodel/ Seismic Retrofit	Existing to Remain
16280	AA-359 Relocatable Building	Portable - Bungalow		1,852			
16601	Shop #2	Permanent					2,999
16771	AA-1243 Relocatable Building	Portable - Bungalow		1,922			
16776	AA-747 Relocatable Building	Portable - Bungalow		1,912			
16880	Shop #3	Permanent					6,541
17042	Auditorium	Permanent				14,957	
17203	Cafeteria	Permanent					5,231
24065	M-476	Portable - Storage					381
28915	Sanitary Building	Permanent					864
41362	Elevator Building	Permanent					413
41376	Walk-in Freezer	Portable enclosure					151
New Building Construction							
	(New) Administration and Classroom Building	Permanent			55,000		
	M&O #1	Permanent			2,600		
	Modular Classroom Building (for City of Angels)	Permanent			2,400		
	Campus Total* (does not include outdoor space)		62,442	12,172	60,000	14,958	64,485

Note: All numbers are in square feet. All new square footages are approximate and subject to change during final site and architectural planning and design phases. These square footage changes would not significantly change the environmental analysis or findings in this IS. This table provides square footage for changes to existing and proposed buildings and portable structures; it does not include 4,211 square feet in demolition of arcades.

* Square footage totals may not add up exactly due to rounding and the way usable space is calculated. All numbers are based on *LAUSD Irving Middle School Preliminary Draft Space Program*, June 21, 2023, and *Test Fit 3A in LAUSD Irving Steam Magnet Middle School Site Analysis and Program Development Report (Site Analysis)*, February 3, 2023.

Current total square footage = 154,057. After Project square footage = 139,443. Decrease in campus square footage = 14,614.

Demolition and Removal

As shown in Figure 10, the proposed Project includes the demolition of the three permanent classroom buildings located directly over the identified earthquake fault (Homemaking Building, Classroom Building, and Administration Building). Additionally, the proposed Project includes the removal of six relocatable buildings in the northwest corner of the site due to their location over the fault as part of the District's goal of eliminating portable classroom facilities on campus. The proposed Project would also remove one accessory service structure. Total north of the Administration Building demolition is estimated at approximately 62,442 square feet.

New Construction

The three permanent buildings and six relocatable buildings planned to be demolished would be replaced by the construction of one, approximately 55,000-square-foot, two-story building that would house 19 classrooms and support spaces, administration offices, library, and other building service spaces. Additionally, the proposed Project would include construction of a new Maintenance and Operation (M&O) Building and two modular classrooms to be used by the City of Angeles Community School to the north of the identified fault and vacated Moss Avenue cul-de-sac. All new structures would be located a minimum of 50 feet away from the identified fault as required by state regulations.

Building Upgrades

In addition to the demolition of existing buildings and construction of new buildings, the proposed Project includes seismic and structural retrofitting for the Auditorium.

Additionally, the proposed Project would also improve portions of the parking lots and playgrounds that are located on District property. Any areas located directly above the fault would be turned into outdoors areas, such as hardscape, landscape, or parking areas. The proposed Project also provides for ADA upgrades impacted by the Project scope. Interim Housing would be provided to ensure school is fully operational throughout construction.

After completion of the proposed Project, the City of Angels Community School program would remain elsewhere on Campus, and the Octavia Charter School would be relocated off Campus.

The proposed Project is not anticipated to result in an increase in enrollment at Irving Middle School, as it would modernize the existing school for the safety of existing students. When completed, there would be fewer

classrooms than the existing conditions, as the current 65 standard classrooms would be reduced to 46 standard classrooms.

3.2.2 Site Access, Circulation, and Parking

Vehicular Site Access

Irving MS provides existing vehicular access at the following locations:

- Vehicular Access 1 on Estara Avenue providing access to along the abandoned Roswell Street, which runs through campus and provides on-campus parking
- Vehicular Access 2 on Fletcher Drive ("SpEd Bus Entrance") providing access to the abandoned Moss Street cul de sac, which runs through campus and provides a connection to existing on-campus parking locations
- Vehicular Access 3 near Avenue 32
- Vehicular Access 4 on Avenue 32

The proposed Project does not anticipate any reconfiguration or relocation of the four existing vehicular campus points of entry. One new vehicular point of entry would potentially be added along Marguerite Street to provide access to approximately 30 new parking stalls (Figure 9).

Pedestrian Site Access

Irving Middle School provides existing pedestrian access at the following locations:

- Three Pedestrian Field Gates providing access to the Athletic Field from Estara Avenue
- Pedestrian Gate ("Visitor Entrance") on Estara Avenue at Roswell Street
- Irving MS Main Entrance Gate – Pedestrian ("Main Gate") on Estara Avenue
- Pedestrian Gate on Marguerite Street
- Pedestrian Gate on Marguerite Street ("Octavia Gate 1" serving as the Charter School Entrance)
- Pedestrian Gate on Avenue 32 ("Magnet Gate" serving as the Magnet and Lacer Program Entrance)
- Pedestrian Gate on Fletcher Drive ("Octavia Gate 3" serving as the City of Angels Entrance)
- Pedestrian Gate on Fletcher Drive ("Fletcher Gate")

After the proposed Project, all existing pedestrian points of entry would remain except for "Octavia Gate 3," which serves as the City of Angels Entrance along Fletcher Drive. This entrance would be relocated, as the City of Angels would be relocated on-campus.

On-Campus Circulation and Parking

On-campus circulation would be modified due to new and reconfigured landscaped, hardscaped, and parking areas on campus. The proposed Project would remove approximately 45 parking spaces south of Roswell Street in order to accommodate the new Administration and Classroom Building, and it would add approximately 30 parking spaces on-campus north of Marguerite Street and five parking spaces on-campus north of Bridwell Street. Additional parking spaces on the Campus may be removed and/or reconfigured to accommodate new landscaping or hardscape areas such as basketball courts. Upon completion of the Project, the minimum parking requirements would either be met or exceeded. Required parking and adequate vehicle circulation would also be maintained throughout the duration of construction.

3.2.3 Landscaping

Landscaped and hardscaped areas would be designed to be located directly above the fault as only nonstructural construction is permitted in those areas. The proposed Project would include new landscaped areas that contribute to meeting the District Board's goal of 30 percent landscaped areas. The proposed Project would increase pervious ground cover by converting existing impervious areas (such as the existing Administration Building, Classroom Building, Homemaking Building, hardscaped parking areas, and hardscaped recreation areas).

Tree Removal

Irving MS has several mature trees located on Campus. The Tree Inventory in the Site Analysis documented a total of 120 trees that were determined to be "protected" or "significant." Per the LAUSD Tree Trimming and Removal Procedure guidelines, "protected" trees include all indigenous oaks species (excluding scrub oak), western sycamore, American sycamore, Southern California black walnut, and California bay laurel, if they measure 4 inches or more in cumulative diameter at 4.5 feet above ground level at the base of the tree and were not grown as part of a tree planting program.[40] A "significant" tree is any tree with a trunk diameter of 8 inches or larger. Of the 120 trees inventoried on the Campus, four are protected, including one coast live oak and three western sycamore trees. The remaining 116 trees are significant and subject to the District's policies.

Figure 11: Tree Inventory Status Map documents the existing trees inventoried on the Campus. Any tree under 8 inches in diameter was not documented, as it would not be considered "significant." There are four protected trees located on the Campus, one of which requires removal under the proposed Project and is therefore subject to the LAUSD Tree Trimming and Removal Procedure guidelines. The protected tree that would be removed is Tree #67 (western sycamore), which is located where the new Administration and Classroom Building would be constructed. The protected trees that would remain on the Campus are Trees #5, #16, and #115 (see Appendix C, *Tree Inventory from Site Analysis & Program Development Report*). Tree #5 (western sycamore) is located above the fault at the southern corner of Moss Avenue and Roswell Street, Tree #16 (western sycamore) is located next to the Shop #3 Building, and Tree #115 (coast live oak) is located along the southern edge of the project site near the basketball courts.

[40] Los Angeles Unified School District Office of Environmental Health & Safety. Revised April 24, 2023. Tree Trimming & Removal Procedure. https://www.lausd.org/cms/lib/CA01000043/Centricity/Domain/135/LAUSD_Tree_Protection.pdf

As required by the LAUSD tree trimming and removal procedure guidelines, Tree #67 may be relocated or removed subject to submittal of a Tree Removal Application and approval by the Director of OEHS and replacement equivalent to the City of LA Tree Preservation Ordinance requirements.

Additionally, any corrective tree trimming or removal must comply with LAUSD OEHS guidelines and procedures. Tree trimming or removal shall be avoided during the avian breeding and nesting season (February 1st through August 31st) when feasible. For any work requiring tree removal, or pruning, the presence of culturally significant trees should be identified with the school administrator to determine if proposed activities may impact trees.

3.2.4 Construction Phasing and Equipment

Construction is planned to start in the first quarter (Q1) of 2026 and be completed by Q3 2029 (approximately 42 months). **Table 5: Construction Schedule and Equipment** summarizes the proposed construction activities and schedule for implementation of the proposed Project. Access would be provided throughout construction from Fletcher Avenue onto Moss Avenue and/or from Estara Avenue onto Roswell Street. It is anticipated that construction would be conducted in five phases:

- **Phase 1:** Set Up Interim Housing

  Prior to the demolition and construction of any structures, temporary interim facilities would be added to the campus to house classrooms during construction. The interim facilities would be located along Fletcher Avenue adjacent to the Athletic Field.

- **Phase 2:** Demolish Administration Building

- **Phase 3:** Construct New Administration and Classroom Building

  Staging is anticipated to move to where the Administration Building was located.

- **Phase 4:** Remove Homemaking Building, Classroom Building, Six Bungalows and Interim Housing

- **Phase 5:** Site Work Including Landscape, Hardscape, Parking

  The final stage of construction would involve the installation of the M&O buildings and any site work.

The construction schedule utilized in the analysis represents a "worst-case" analysis scenario as emission factors for construction equipment decrease as the phasing schedule time increases, due to improvements in technology and more stringent regulatory requirements. The duration of construction activities would be approximately 42 months, from Q1 2026 to Q3 2029, and the associated construction equipment represents a reasonable estimate of the construction fleet required. The construction scenario assumes construction activities would occur in the following phases: demolition, site preparation, grading, building construction, paving, and architectural coating. Construction equipment anticipated to be used for each phase, as listed in Table 5, was estimated based on projects of comparable size and land uses.

Table 5
Construction Schedule and Equipment

Schedule	# of Equipment	Equipment Type	# Hours/Day
Demolition			
1/12/2026 – 6/26/2026 (120 days)	1	Excavators	4
	1	Rubber tired dozers	2
Site Preparation			
6/27/2026 –1/22/2027 (150 days)	1	Tractors/loaders/backhoes	4
Building Construction			
1/23/2027 – 7/20/2029 (650 days)	1	Cranes	4
	1	Forklifts	4
	1	Generator sets	8
	1	Tractors/loaders/backhoes	7
	1	Welders	2
Paving			
7/21/2029 – 9/10/2029 (36 days)	1	Pavers	8
	1	Rollers	8
Architectural Coating			
9/11/2029 – 9/24/2029 (10 days)	1	Air compressors	6

The demolition phase would involve the use of heavy equipment to permanently remove 62,442 square feet of existing buildings. Site preparation activities would involve hand tools and minimal use of heavy equipment to water the proposed Project site following demolition, vegetation clearing, and the removal of unwanted materials at the proposed Project site. Portable buildings will also be removed during his phase and relocated during the construction phase.

Building construction involves the construction of the new pads for the relocation of the portable buildings and construction of the newly proposed buildings. Construction employees are anticipated to work at the proposed Project site for the duration of all construction phases, but site-specific construction fleet would vary due to specific Project needs at the time of construction. The final construction phase, including architectural coating, is required for the interior and exterior surfaces for the new educational and service buildings.

3. Project Description

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Irving MS Project – Project Scope and Budget

Proyecto en Irving MS – Componentes y presupuesto del proyecto

New Construction

- (~19) Classrooms and Support Spaces
- Administration
- Library
- Maintenance & Operations
- (2) Classrooms for City of Angels District Program

Construcción Nueva

- *~19 Aulas y espacios de apoyo*
- *Administración*
- *Biblioteca*
- *Mantenimiento y Operaciones*
- *(2) Aulas para el Programa del Distrito de la Ciudad de Ángeles*

Seismic Retrofit

- Auditorium

Reforzamiento sísmico

- *Auditorio*

Site Work

- Site Infrastructure (as required)
- Landscape Improvements
- Parking
- Interim Facilities (as required)

Trabajo en el sitio

- *Infraestructura del sitio (según sea necesario)*
- *Mejoras de jardinería*
- *Estacionamiento*
- *Instalaciones provisionales (según sea necesario)*

Project Budget

- $139.9 million

Presupuesto

- *$139.9 millones*

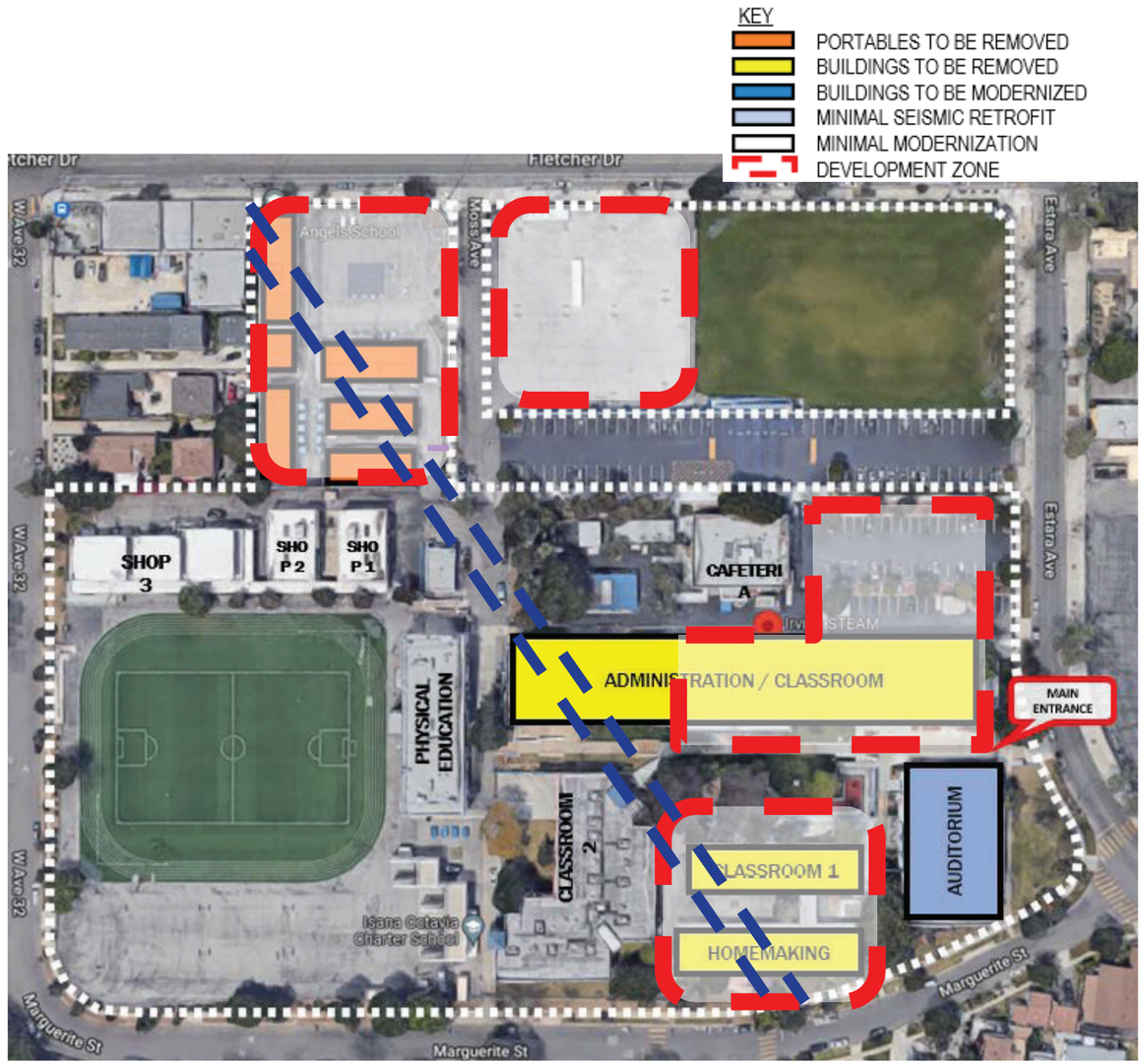

FIGURE 9
Proposed Project Site Plan

3. Project Description

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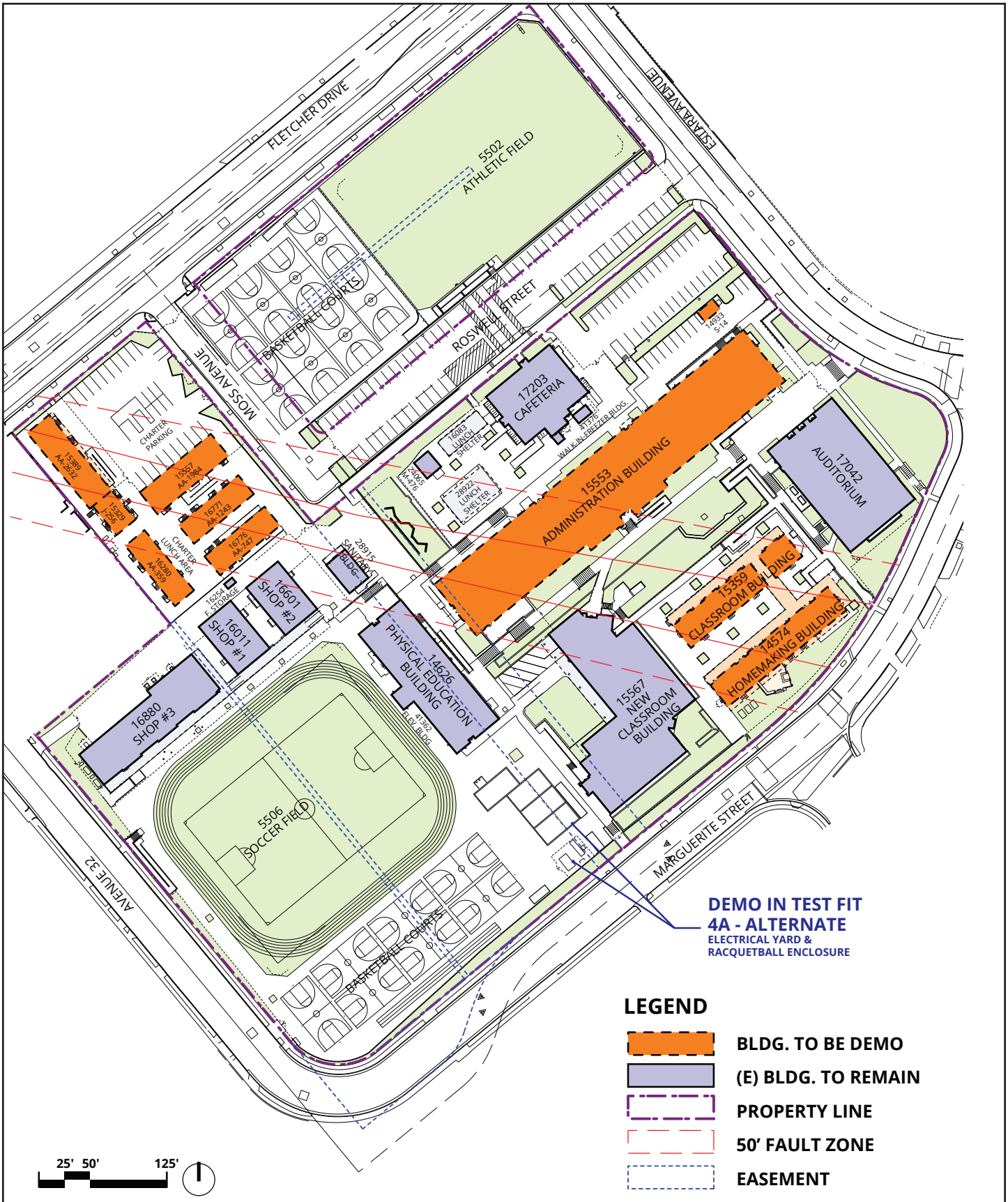

SOURCE: NAC Architecture. February 03, 2023. Prepared for Los Angeles Unified School District (LAUSD). Irving Steam Magnet Middle School Site Analysis & Program Development Report. Project No. 10372111. Page 5.1.2.

FIGURE 10
Demolition Plan

3. Project Description

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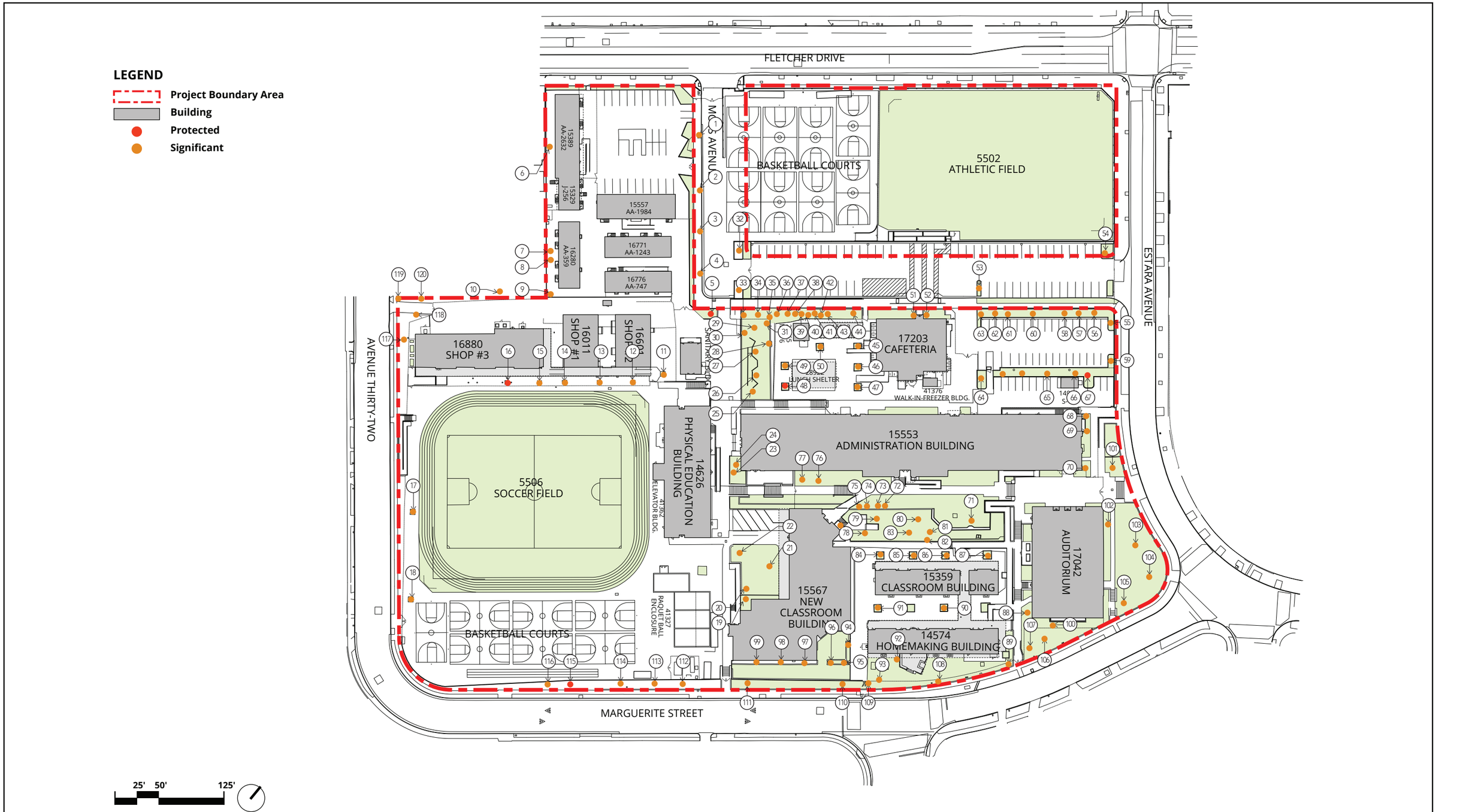

SOURCE: NAC Architecture. February 03, 2023. Prepared for Los Angeles Unified School District (LAUSD). Irving Steam Magnet Middle School Site Analysis & Program Development Report. Project No. 10372111. Page 2.4.21.

FIGURE 11
Tree Inventory Status Map

3. Project Description

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4. Environmental Checklist and Analysis

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

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

- ☐ Aesthetics
- ☐ Agriculture & Forestry Resources
- ☒ Air Quality
- ☐ Biological Resources
- ☒ Cultural Resources
- ☐ Energy
- ☐ Geology & Soils
- ☐ Greenhouse Gas Emissions
- ☒ Hazards & Hazardous Materials
- ☐ Hydrology & Water Quality
- ☐ Land Use & Planning
- ☐ Mineral Resources
- ☒ Noise
- ☒ Pedestrian Safety
- ☐ Population & Housing
- ☐ Public Services
- ☐ None
- ☐ Recreation
- ☒ Transportation & Traffic
- ☐ Tribal Cultural Resources
- ☐ Utilities & Service Systems
- ☐ Wildfire
- ☒ Mandatory Findings of Significance
- ☐ None with Mitigation Incorporated

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.

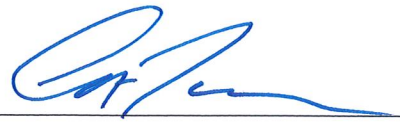
☐ I find that although the proposed Project could have a significant effect on the environment, there will not be a significant effect in this case because revisions on the Project have been made by or agreed to by the Project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

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

☐ I find that the proposed Project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately 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.

4. Environmental Checklist and Analysis



Signature

December 1, 2023

Date

Carlos A. Torres

Printed Name

CEQA Officer for LAUSD

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, 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 mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from "Earlier Analyses," as described in (5) below, may be cross-referenced).

5. Earlier analyses may 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 source list should be attached, and other sources used or individuals contacted should be cited in the discussion.

8. This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected.

9. The explanation of each issue should identify:
   a) the significance criteria or threshold, if any, used to evaluate each question; and
   b) the mitigation measure identified, if any, to reduce the impact to less than significance.

4. Environmental Checklist and Analysis

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ENVIRONMENTAL IMPACTS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
I. AESTHETICS. Except as provided in Public Resources Code section 21099 (where aesthetic impacts shall not be considered significant for qualifying residential, mixed-use residential, and employment centers), would the project:				
a. Have a substantial adverse effect on a scenic vista?	☐	☐	☒	☐
b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☐	☒
c. In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage points.) If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	☐	☐	☒	☐
d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☒	☐

Explanation:

LAUSD has SCs for minimizing impacts to aesthetic resources. Applicable SCs related to aesthetic resource impacts associated with the proposed Project are provided below:

LAUSD Standard Conditions of Approval	
SC-AE-1	LAUSD shall review all designs to ensure that demolition of existing buildings or construction of new buildings on its historic campuses are designed to ensure compatibility with the existing campus. The School Design Guide shall be used as a reference to guide the design. **School Design Guide[41]** This document outlines measures for re-use rather than destruction of historical resources. It 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	LAUSD shall review all designs to ensure that methods from the current School Design Guide are incorporated throughout the planning, design, construction, and operation of the Project in order to limit aesthetic impacts. **School Design Guide**

[41] The School Design Guide establishes a consistent level of functionality, quality and maintainability for all District school facilities. The document has design guidelines and criteria for the planning, design and technical development of new schools, modernizations, and building expansion projects; it includes by reference the Facilities Space Program, the Educational Specifications, the Guide Specifications, the Standard Technical Drawings of the District, and applicable codes, regulations and industry standards.

4. Environmental Checklist and Analysis

LAUSD Standard Conditions of Approval	
	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 the proposed project's consistency with the general character of the surrounding neighborhood, including, but not limited to, any proposed changes to the density, height, bulk, and setback of new buildings (including stadiums), additions, or renovations. Where feasible, LAUSD shall make appropriate design changes to reduce or eliminate viewshed obstruction and degradation of neighborhood character. Such design changes may include, but are not limited to, changes to the campus layout, height of buildings, landscaping, and/or the architectural style of buildings.
SC-AE-4	LAUSD shall review all designs to ensure that the installation of a school marquee complies with Marquee Signs Bulletin BUL 5004.1. **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 schools. The policy also includes measures to mitigate light and glare, such as the use of "luminaries" in connection with school construction.
SC-AE 5	LAUSD shall review all designs and test new lights following installation to ensure that adverse light trespass and glare impacts are avoided. **School Design Guide** This document outlines Illumination Criteria, requirements for outdoor lighting and measures to minimize and eliminate glare that may impact pedestrians, drivers and sports teams, and to avoid light trespass onto adjacent properties.
SC-AE 6	The International Dark-Sky Association (IDA) and the Illuminating Engineering Society (IES) Model Lighting Ordinance (MLO) shall be used as a guide for environmentally responsible outdoor lighting. The MLO has outdoor lighting standards that reduce glare, light trespass, and skyglow. The MLO uses lighting zones (LZ) 0 to 4, which allow the District to vary the lighting restrictions according to the sensitivity of the community. The MLO also incorporates the Backlight-Uplight-Glare (BUG) rating system for luminaires, which provides more effective control of unwanted light. The MLO establishes standards to: • Limit the amount of light that can be used. • Minimize glare by controlling the amount of light that tends to create glare. • Minimize sky glow by controlling the amount of uplight. • Minimize the amount of off-site impacts or light trespass.

a) Have a substantial adverse effect on a scenic vista?

Less than Significant Impact. The proposed Project would result in less than significant impacts to aesthetics in relation to substantial adverse effects on scenic vistas. There are no designated scenic vista points within the proposed Project area according to the California Department of Transportation's (Caltrans) inventory of

scenic vistas or the SUP Program EIR.[42,43] Vista points, as defined by Caltrans, are "places where motorists can safely view scenery or park and relax" that are throughout the state highway system.[44] Vista points and related facilities are further defined as a vista point, scenic overlook, wildlife viewing, trailhead access area, or other places specifically for the public to stop and view the local landscape, which include walkways, interpretive displays and information, railings, benches, trash receptacles, monuments, and other facilities and are designed to be fully accessible.[45,46] The proposed Project site is not visible from any scenic vistas or aesthetic features designated in the SUP Program EIR or by Caltrans due to distance, intervening topography and tree canopy, development, elevated highway systems, and sprawl and high density characteristics between the proposed Project area and any designated scenic vistas.[47] The designated scenic vistas or aesthetic features identified in the Program EIR that are closest to the proposed Project site include Dodger Stadium, Elysian Park, and Griffith Park and Observatory. Of the three scenic vistas or aesthetic features, Elysian Park is the nearest at approximately 2.0 miles south-southwest of the proposed Project site. The Project site is not visible from Elysian Park. Griffith Park and Observatory are approximately 3.3 miles west of the Project site. The Project site, which slopes upward from the edges of the site to the campus core, is an existing school campus containing one- to two-story buildings and 120 landscape trees. Griffith Park and Observatory is perched on the southern edge of the Griffith Park ridgeline and is visible from the Project site as the Project site sits at a lower elevation, and Griffith Park and Observatory can be seen as part of the background hillside and natural skyline to the west. However, based on the City's high density and urban sprawl characteristics, distance, topography, citywide street tree canopies in the basin area, elevated freeway systems, and varying heights of development within the viewshed, plus Griffith Park and Observatory's projection of the City from a higher elevation, the Project site is not distinguishable among the urban massing from Griffith Park and Observatory.

The proposed Project would incorporate SCs to limit and/or minimize impacts to aesthetics and visual resources such as scenic vistas or viewsheds during construction and operations. The following SCs shall be included: SC-AE 2 and SC-AE 3 to minimize obstruction or impacts to visual resources. The location of the new structures would not alter the viewshed of the two nearest scenic resources, Elysian Park and Griffith Park and Observatory. While the Project site would remain visible from Griffith Park and Observatory, the replacement of buildings on the existing campus would not dominate or obstruct views from this feature or cause the Project site to become distinguishable. Therefore, the Project would result in less than significant impacts to aesthetics from the proposed Project in relation to scenic vistas, aesthetics features, or vista points with incorporation of SCs. No further analysis is warranted.

[42] California Department of Transportation (Caltrans). N.d. Vista Points: Vista Point Planning and Design. Accessed 8/27/23. Available at: https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-k-vista-points
[43] Los Angeles Unified School District. September 2015. LAUSD School Upgrade Program EIR. Accessed 8/27/23.
[44] California Department of Transportation (Caltrans). N.d. Vista Points: Vista Point Planning and Design. Accessed 8/27/23. Available at: https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-k-vista-points
[45] California Department of Transportations (Caltrans). July 1, 2020.. Highway Design Manual, Seventh Edition Update. Accessed 8/27/23/ Available at: https://dot.ca.gov/programs/design/manual-highway-design-manual-hdm
[46] California Department of Transportations (Caltrans). July 1, 2020. Highway Design Manual, Seventh Edition: Topic 914 – Vista Points. Accessed 8/27/23/ Available at: https://dot.ca.gov/-/media/dot-media/programs/design/documents/chp0910-a11y.pdf
[47] Los Angeles Unified School District. September 2015. LAUSD School Upgrade Program EIR. Accessed 8/27/23.

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

No Impact. The proposed Project would result in no impacts to aesthetics regarding substantially damaging scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway. There are no officially designated or eligible state scenic highways within the proposed Project area. According to the California Scenic Highway Program,[48] the U.S. Department of Transportation Federal Highway Administration,[49] and the Program EIR,[50] the three nearest scenic highways to the proposed Project site are SR-2, Interstate (I) 210, and SR-110:

- The nearest officially designated state scenic highway is the Angeles Crest Highway (SR-2) in the Angeles National Forest, approximately 8.3 miles north-northeast of the proposed Project site from Interstate 210 (I-210) to the San Bernardon County Line.

- The nearest eligible state scenic highway is the I-210, approximately 5.5 miles north from I-5 (near Tunnel Station) to SR-134 in Pasadena.

- The Project site is also located near a federal scenic and historic designated byway, Arroyo Seco Historic parkway (SR-110), approximately 2.6 miles south-southeast of the proposed Project site.

Due to distance, intervening topography, tree canopies and dense vegetation, and the urban context of the Project site in the foreground at a lower elevation than all three highways, the Project site is not located in the foreground and not likely to be visible from the Officially Designated or Eligible State scenic highways or the federal scenic and historic byway.

The proposed Project would incorporate SCs to limit and/or minimize impacts to aesthetics in relation to substantially damaging visual resources within a state scenic highway during construction and operations. The following SCs would be included: SC-AE 1, SC-AE 2, SC-AE 3, and SC-AE 4 to minimize damages or impacts to visual resources. The Project site is not located within a state or federal designated scenic highway/byway corridor. Therefore, the Project site would result in no impacts to aesthetics in relation to substantially damaging scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway with implementation of SCs. No further analysis is warranted.

c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage points.) If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

Less than Significant Impact. The proposed Project would result in less than significant impacts to aesthetics in relation to substantially degrading the existing visual character or quality of public views of the site and its surroundings. The proposed Project is an existing middle school campus located in an urbanized area that is

[48] California Department of Transportation (Caltrans). N.d. California State Scenic Highways System. Accessed on 8/25/23. Available at: https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways
[49] U.S. Department of Transportation Federal Highway Administration. N.d. National Scenic Byways and All-American Roads: Arroyo Seco Historic Parkway – Route 110. Accessed 8/27/23. Available at: https://fhwaapps.fhwa.dot.gov/bywaysp/byways
[50] Los Angeles Unified School District. September 2015. LAUSD School Upgrade Program EIR. Accessed 8/27/23.

situated on an approximate 11.2-acre site located within the Northeast Community Area Plan in the urban neighborhood of Glassell Park. LAUSD has many humanmade aesthetic resources that include buildings or building clusters that have distinctive appearance; history; societal or cultural importance; and locations or sites with significance or sense of place.[51] The Project site was originally the location where Andrew Glassell built his "Ranch House" in 1889.[52] The land was originally surrounded by citrus orchards and walnut groves. The orchards and groves along with the surrounding areas would eventually be transformed into residential tract made up of individually designed bungalow residences. In 1936, the City purchased Glassell's ranch house through eminent domain to establish Irving MS, which included the following buildings: Administration Building; Auditorium; Physical Education Building; Cafeteria; and two-unit shops that were constructed between 1936 and 1939.[53] According to the HRER (Appendix B), the Administration Building, Auditorium, and Physical Education Building were designed by Edwin L. Bergstrom; and the Cafeteria and two-unit shops were designed by Alfred S. Nibecker Jr. The buildings by Bergstrom "exhibit character-defining features associated with Public Works Administration … Moderne architecture, with elements of Streamline Moderne style."[54] Today the Project site continues to be surrounded predominantly by multi-family residential with some single-family residential, commercial, industrial, and public facilities. While there are street trees that line Fletcher Drive, commercial and industrial uses are mostly present along the roadway where the residential is beyond Fletcher Drive into the neighborhood. The existing two-story Administration Building would be replaced with a similar two-story Administration Building and classroom combination building with a slightly reconfigured footprint, and the campus skyline would not encounter a major change. Aside from the school's architectural character and style, there are not many remnants of bungalow in the surrounding area, and much of the neighborhood structures appears transformed into modern day structures with mixed architecture styles and materials.

The proposed Project would consist of building replacement and reconfiguration including the demolition of the historic contributor Administration Building plus other classrooms, both fixed and portable; the construction of a new administration and classroom combination permanent building, and some smaller portable building structures for facilities; and other building and exterior upgrades. The purpose for replacement and reconfiguration of buildings on the campus is seismic safety due to their location being directly over a current fault line. The Program EIR has indicated that for safety reasons the historic Administration Building, among other buildings, will need to be replaced and reconfigured on site. The proposed Project would incorporate the LAUSD SCs to minimize impacts to aesthetics in relation to substantially degrading visual character or quality of public view of the site and its surroundings during construction and operations. The proposed Project's land use and zoning designations would not change as a result of the improvements; nor would it conflict with existing applicable regulations relating to scenic quality. The following SCs shall be included: SC-AE 1 through SC-AE 6 to minimize damages or impacts to visual resources due to the replacement of the Administration Building.

The proposed Project would involve replacement of historical structures, which would need to comply with design review guidelines and process for maintaining consistency with historic architecture. The proposed Project would not conflict with land use and zoning designations as there would be no changes in use.

[51] Los Angeles Unified School District. September 2015. LAUSD School Upgrade Program EIR. Accessed 8/27/23.
[52] Los Angeles Unified School District. August 2022. Historic Resource Evaluation Report.
[53] Los Angeles Unified School District. August 2022. Historic Resource Evaluation Report.
[54] Los Angeles Unified School District. August 2022. Historic Resource Evaluation Report.

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Furthermore, there would be no conflict with zoning designations because, as allowed per Government Code Section 53094, in 2019 the LAUSD Board of Education adopted a resolution to exempt all LAUSD school sites from local land use regulations. Therefore, the proposed Project would have less than significant impact with implementation of SCs in relation to visual character, quality of public views, and applicable zoning. No further analysis is warranted.

d) 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 proposed Project would result in less than significant impacts to aesthetics related to the creation of a new source of substantial light or glare that would adversely affect daytime or nighttime views in the vicinity of the proposed Project area.

Due to its urban context, the Los Angeles basin experiences a very high nighttime sky glow and as well as nighttime and daytime glare. The Program EIR indicates that the existing lighting consists of exterior lighting fixtures located on the building facades that include surface mounted light-emitting diode (LED) floor/box lighting fixtures. According to the Program EIR, the following lighting systems are included in the proposed Project: flood lighting (pole mounted and utility power pole), parking lot (pole mounted LED fixtures), flood lighting (surface mounted), and sports lighting. However, overhead streetlights surround the Project site along Estara Avenue, Fletcher Drive, Marguerite Street, and Moss Avenue. In addition, there is perimeter lighting that is aimed at the Project site to illuminate the school and play fields while also providing security. Two major causes of light pollution are glare and spill light. Spill light is caused by misdirected light that illuminates areas outside the area intended to be lit. Glare occurs when a bright object is against a dark background, such as oncoming vehicle headlights or an unshielded light bulb. In addition, as stated in the Program EIR, "when the surrounding conditions get brighter, more light is needed to see. Providing greater power than is needed potentially leads to debilitating glare and an increasing spiral of brightness as overbright projects populate surrounding conditions causing future projects to unnecessarily require greater power resulting in wasted energy."[55] The construction of the new buildings would comply with the following SCs: SC-AE 2, SC-AE- 4, SC-AE 5, and SC-AE-6 plus consideration of efficient glazing materials and window films with glare control finishes as well as daylighting analysis, as noted in the Program EIR and LAUSD School Design Guide, to minimize effects of light trespass and glare. Therefore, the proposed Project would result in less than significant impacts to aesthetics related to the creation of a new source of substantial light or glare that would adversely affect daytime or nighttime views in the proposed Project area with implementation of SCs. No further analysis is warranted.

[55] Los Angeles Unified School District. September 2015. LAUSD School Upgrade Program EIR. Accessed 8/27/23.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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, as updated) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:				
a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒
b. Conflict with existing zoning for agricultural use or a Williamson Act contract?	☐	☐	☐	☒
c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220[g]), timberland (as defined by Public Resources Code Section 4526) or timberland zoned Timberland Production (as defined by Government Code Section 51104[g])?	☐	☐	☐	☒
d. Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☐	☒

Explanation:

The Program EIR does not include any include any SCs for minimizing Project impacts to agriculture and forestry resources. Projects implemented under the SUP were determined in the Program EIR to result in less than significant impacts to agriculture and forestry resources. The Project-specific analysis has determined that implementation of the proposed Project would result in no impacts to agriculture and forestry resources.

The Project site has been a completely developed school since 1937. There are no prime or unique farmlands or farmlands of local or statewide importance or suitable for such a designation. There are also no forest or timberland reserves. Project site visits confirmed that the only existing trees at the subject site were trees that had been planted for the school property. Agriculture and forestry resources in the Project vicinity were evaluated with regard to the Farmland Mapping and Monitoring Program (FMMP) of the California

Department of Conservation, the Los Angeles City General Plan,[56] the California Department of Conservation Williamson Act Contract Land website,[57] and the Los Angeles City Zoning Code.[58]

a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?

No Impact. The Project site is currently developed and void of any agricultural uses. The California Department of Conservation Important Farmland Map for Los Angeles County identified the Project site as urban and built-up land. Further, there is no Prime Farmland, Unique Farmland, or Farmland of Statewide Importance located adjacent to the Project site. Therefore, no impact to Prime Farmland, Unique Farmland, or Farmland of Statewide Importance would occur.[59] No mitigation or further study is required.

b) Conflict with existing zoning for agricultural use or a Williamson Act contract?

No Impact. A Williamson Act contract is an agreement between private landowners and their city and/or county where the landowner voluntarily restricts their land to agriculture and compatible open space uses. The Project site is a school campus with no agricultural uses and does not include land enrolled in a Williamson Act contract. Therefore, no impact would occur regarding conversion of existing agriculture uses or Williamson Act contracts. No mitigation or further study is required.

c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?

No Impact. The proposed Project would not conflict with existing zoning of forest land or cause rezoning of forest land, timberland, or timberland zoned for Timberland Production. The proposed Project does not involve any changes to current General Plan land use or zoning designations for forest land, or timberland. Additionally, there are no timberland-zoned production areas within the Project site or surrounding areas. Therefore, no impact to forest land or timberland would occur. No mitigation or further study is required.

d) Result in the loss of forest land or conversion of forest land to non-forest use?

No Impact. The Project site and surrounding area contain no forest land. The Project site is located in an urbanized environment. Thus, implementation of the proposed Project would result in no impacts related to the loss or conversion of forest land to non-forest use. No mitigation or further study is required.

[56] Los Angeles Department of City Planning. Adopted September 2001. Conservation Element of the City of Los Angeles General Plan. Available at: https://planning.lacity.org/cwd/gnlpln/consvelt.pdf
[57] California Department of Conservation, Williamson Act Program. 2015-2016. Williamson Act Program Overview. Available at: https://www.conservation.ca.gov/dlrp/wa/Pages/wa_overview.aspx; map of Williamson Act contracts in Los Angeles County available at: ftp://ftp.consrv.ca.gov/pub/dlrp/wa/
[58] City of Los Angeles Municipal Code, Chapter I, Planning & Zoning, SEC. 12.04.09, "PF" Public Facilities Zone.
[59] California Department of Conservation. 2023. Maps, Reports, and Data. Available at: https://www.conservation.ca.gov/dlrp/fmmp/

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?

No Impact. The Project site does not contain agricultural or forest uses. The Project site is developed with school facilities. No changes to the existing environment would occur from implementation of the proposed Project that could result in conversion of farmland to nonagricultural use or forest land to non-forest use. Thus, no impact would occur. No mitigation or further study is required.

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	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

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

Are significance criteria established by the applicable air district available to rely on for significance determinations? ☒ Yes ☐ No

Would the project:

a. Conflict with or obstruct implementation of the applicable air quality plan?	☒	☐	☐	☐
b. 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?	☒	☐	☐	☐
c. Expose sensitive receptors to substantial pollutant concentrations?	☒	☐	☐	☐
d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☒	☐

Explanation:

LAUSD has SCs for minimizing impacts to air quality. Applicable SCs related to air quality impacts associated with the proposed Project are provided below:

LAUSD Standard Conditions of Approval	
SC-AQ-1	LAUSD shall complete a Health Risk Assessment for new campus locations that would place classrooms or play areas within close proximity (less than 0.25 mile) of existing sources of adverse emissions. LAUSD shall identify all permitted and non-permitted stationary sources, freeways and other busy traffic corridors, railyards, and large agricultural operations within 0.25 mile of the project. Once identified, make a determination about the need for qualitative evaluation, screening level evaluation in accordance with air district specific guidance and tools, or a refined evaluation with air dispersion modeling, to determine the if risks constitute an actual or potential endangerment of public health to persons who would attend or be employed at the school. For freeways and other busy traffic corridors within 500 feet, air dispersion modeling must be used to make the health risk determination (no screening, no qualitative discussion, etc.). The Health Risk Assessment shall comply with 'Air Toxics Health Risk Assessment (HRA)'. This document includes guidance on HRA protocols for permitted, non-permitted, and mobile sources that might reasonably be anticipated to emit hazardous air emissions and result in potential long-term and short-term health impacts to student and staff at the school site.

	The HRA must find that health risks are below criteria thresholds. If health risks which exceed air district criteria thresholds are identified, the school campus shall be redesigned or relocated to a site farther from the emissions generator.
SC-AQ 2	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.
SC-AQ 3	Construction Contractor shall: • Maintain speeds of 15 miles per hour (mph) or less 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 haul trucks or stockpiles during dumping. • During transport, cover or enclose trucks transporting soils, increase freeboard requirements, and repair trucks exhibiting spillage due to leaks. • Cover the bottom of the excavated area with polyethylene sheeting when work is not being performed. • Place stockpiled soil on polyethylene sheeting and cover with similar material. • Place stockpiled soil in areas shielded from prevailing winds.
SC-AQ-4	LAUSD shall analyze air quality impacts: If site-specific review or monitoring data 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. Construction bid contracts shall include protocols that 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. The Construction Contractor shall be responsible for documenting compliance with the identified protocols. Specific air emission reduction protocols include, but are not limited to, the following. <u>Exhaust Emissions</u> • Schedule construction activities that affect traffic flow to off-peak hours (e.g. between 10:00 AM and 3:00 PM). • Consolidate truck deliveries and limit the number of haul trips per day. • Route construction trucks off congested streets, as permitted by local jurisdiction haul routes. • Employ high pressure fuel injection systems or engine timing retardation. • Use 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 at least Tier 4 (model year 2008 or newest available model) emission limits for engines between 50 and 750 horsepower. • Restrict non-essential diesel engine idle time, to not more than five consecutive minutes. • Use electrical power rather than internal combustion engine power generators. • Use electric or alternatively fueled equipment, as feasible. • Use construction equipment with the minimum practical engine size. • Use low-emission on-road construction fleet vehicles. • Ensure construction equipment is properly serviced and maintained to the manufacturer's standards.

	Fugitive Dust • Apply non-toxic soil stabilizers according to manufacturers' specification to all inactive construction areas (previously graded areas inactive for 10 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 unimproved 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 unimproved construction access roads for at least 100 feet from the main road to the project site. • 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 5% or greater silt content. • Suspend all excavating and grading operations when wind speeds (as instantaneous gusts) exceed 25 miles per hour (mph). • Water disturbed areas of the active construction and unpaved road surfaces at least three times daily, except during periods of rainfall. • Limit traffic speeds on unpaved roads to 15 mph or less. • Prohibit fugitive dust activities on days where violations of the ambient air quality standard have been forecast by SCAQMD. • Tarp and/or maintain a minimum of 24 inches of freeboard on trucks hauling dirt, sand, soil, or other loose materials. • Limit the amount of daily soil and/or demolition debris loaded and hauled per day. General Construction • Use 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). • Prepare and implement 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.

The primary air pollutants of concern for which ambient air quality standards (AAQS) have been established are ozone (O_3), carbon monoxide (CO), coarse inhalable particulate matter (PM_{10}), fine inhalable particulate matter ($PM_{2.5}$), sulfur dioxide (SO_2), nitrogen dioxide (NO_2), and lead (Pb). Areas are classified under the federal and California Clean Air Act as either in attainment or nonattainment for each criteria pollutant based on whether the AAQS have been achieved. The South Coast Air Basin (SoCAB), which is managed by the South Coast Air Quality Management District (SCAQMD), is designated nonattainment for O_3, and $PM_{2.5}$ under the California and National AAQS, nonattainment for PM_{10} under the California AAQS, and nonattainment for lead (Los Angeles County only) under the National AAQS.[60]

[60] Area Designations Maps / State and National. August 22, 2014. Accessed October 01, 2018. http://www.arb.ca.gov/desig/adm/adm.htm.

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

Potentially Significant Impact. The proposed Project may violate any air quality standard or contribute substantially to an existing or projected air quality violation. The Draft EIR will thus analyze this impact and will identify applicable air quality standards and the federal and state attainment status for pollutants within the SoCAB. The Draft EIR will also include an analysis of the estimated emissions associated with construction and operation of the proposed Project, as well as an analysis of cumulative impacts associated with emissions of criteria pollutants.

b) 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?

Potentially Significant Impact. The proposed Project may result in a cumulatively considerable net increase of a criterial pollutant for which the Project region is in non-attainment under an applicable federal or state ambient air quality standard. The Draft EIR will thus analyze this impact and will identify air quality standards and the federal and state attainment status for pollutants within the SoCAB. The Draft EIR will also include an analysis of the estimated emissions associated with construction and operation of the proposed Project, as well as an analysis of cumulative impacts associated with emissions of criteria pollutants.

c) Expose sensitive receptors to substantial pollutant concentrations?

Potentially Significant Impact. The proposed Project may expose sensitive receptors to substantial pollutant concentrations. The Draft EIR will thus analyze this impact and will identify applicable air quality standards and the federal and state attainment status for pollutants within the SoCAB. The Draft EIR will also include an analysis of the estimated emissions associated with construction and operation of the proposed Project and will also include an analysis of impacts to nearby sensitive receptors associated with emissions of criteria pollutants.

d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

Less than Significant Impact. The proposed Project would result in less than significant impacts to air quality regarding the creation of objectionable odors that would adversely affect a substantial number of people. According to the California Air Resource Board (CARB's) Air Quality Handbook,[61] land uses associated with odor complaints include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding. There are no land uses typically associated with the generation of nuisance odors in the Project area. Construction of the proposed Project would release short-term odorous emissions, which would cease upon completion of the proposed Project; however, the implementation of SC-AQ-3 and SC-AQ-4, during construction activities would lower exhaust emissions and fugitive dust levels. The incorporation of SC-AQ-2 would mandate contractors to keep equipment properly tuned and thereby reduce harmful emissions and odors. Odors from landscaping equipment, such as lawnmowers and leaf blowers, would result from operation and maintenance activities of the proposed Project site, but would not change in comparison to the existing setting. Both construction and operation are

[61] California Air Resources Board. April 2005. Air Quality and Land Use Handbook: A Community Health Perspective. http://www.arb.ca.gov/ch/handbook.pdf

anticipated to result in less than significant impacts regarding emissions leading to odors or adversely affecting a substantial number of people. No further analysis is warranted.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
IV. BIOLOGICAL RESOURCES. Would the project:				
a. Have a substantial adverse effect, either directly or through habitat modification, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	☐	☐	☒
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations or by the California Department of Fish and Wildlife or the U.S. Fish and Wildlife Service?	☐	☐	☐	☒
c. Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☐	☒
d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☐	☒	☐
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☒	☐
f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☐	☒

Explanation:

LAUSD has SCs for minimizing impacts to biological resources. Applicable SCs related to biological resources impacts associated with the proposed Project are provided below.

LAUSD Standard Conditions of Approval	
SC-BIO 1	An LAUSD-qualified nesting bird Surveyor or Biologist shall identify plant and animal species and habitat within and near the 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 nesting bird Surveyor or 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: • United States Fish and Wildlife Service (USFWS) • National Marine Fisheries Services (NMFS) • California Department of Fish and Wildlife (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.
- California Natural Diversity Data Base (CNDDB) California Native Plant Society (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.

Biological Resources Report

If a report is necessary and the LAUSD qualified nesting bird Surveyor or 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.

- Information on regional setting that is critical to the assessment of rare or unique resources.
- A thorough, recent floristic-based assessment of special status plans and natural communities, following the CDFW's Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities. CDFW recommends that floristic, alliance- and/or association-based mapping and vegetation impact assessments be conducted at the project site and neighboring vicinity. The Manual of California Vegetation (Sawyer et al.) should also be used to inform this mapping and assessment. Adjoining habitat areas should be included in this assessment where site activities could lead to direct or indirect impacts offsite. Habitat mapping at the alliance level will help establish baseline vegetation conditions.
- 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.
- 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.
- 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.
- Discussions about direct and indirect project impacts on biological resources, including resources in nearby public lands, open space, adjacent natural habitats, wetland and riparian ecosystems, and any designated and/or proposed or existing reserve lands

	(e.g., preserve lands associated with a NCCP). Impacts on, and maintenance of, wildlife corridor/movement areas, including access to undisturbed habitats in adjacent areas. • 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. • Plans for restoration and vegetation shall be prepared by qualified nesting bird Surveyor or Biologist with expertise in southern California ecosystems and native plant vegetation techniques. Plans shall include, at a minimum: o Location of the mitigation site. o Plant species to be used, container sizes, and seeding rates. o Schematic depicting the mitigation area. o Planting schedule. o Irrigation method. o Measures to control exotic vegetation. o Specific success criteria. o Detailed monitoring program. o Contingency measures should the success criteria not be met. o Identification of the party responsible for meeting the success criteria and providing for conservation of the site in perpetuity. 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 of sensitive species and/or habitats.
SC-BIO 2	LAUSD shall protect sensitive wildlife species from harmful or disruptive exposure to light by shielding light sources, redirecting light sources, or using low intensity lighting. All exterior light fixtures shall be listed as dark sky compliant as required under SC-AE-6.
SC-BIO 3	LAUSD shall comply with the following specifications related to bird and bat nesting sites. Project activities (including, but not limited to, staging and disturbances to native and non-native vegetation, structures, and substrates[62]) should occur outside of nesting season to avoid take of birds, bats, or their eggs.[63] Bird Surveys - Construction Demolition or Vegetation Removal in or adjacent to Native Habitat • For construction projects occurring in or adjacent to native habitat, a qualified LAUSD nesting bird Surveyor or qualified Biologist (Surveyor/Biologist) may determine that additional surveys are required outside of the breeding and nesting season (February 1st through August 31st, beginning January 1st for raptors) to determine if protected birds occupy the area (e.g., project site is adjacent to areas with suitable habitat for Southwestern willow flycatcher). • If avoidance of the avian breeding season is not feasible, beginning 30 days prior to the initiation of the project activities, the Surveyor/Biologist with experience conducting nesting 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

[62] Substrate is the surface on which a plant or animal lives.
[63] 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.

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. In areas that contain suitable habitat for listed species, species-specific surveys shall be conducted by a qualified Biologist authorized by the regulatory agencies.

If a protected bird is observed, additional protocol-level surveys may be required to determine if the sighting was a transient individual or if the site is used as nesting habitat for that species. Project activities shall be delayed until there is a final determination.

If an active nest is located, project activities within 300 feet of the nest (within 500 feet for raptor nests), or as determined by the Surveyor/Biologist shall be delayed 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 boundary of the 300- or 500-foot buffer between the project activities and the nest or tree. Project personnel, including all Construction Contractors working on site, shall be instructed on the sensitivity of the area. Protective measures shall be documented to show compliance with applicable State and Federal laws pertaining to the protection of birds.

If the Surveyor/Biologist determines that a narrower buffer between the project activities and active nests is warranted, a written explanation for the change shall be submitted to the LAUSD OEHS CEQA Project Manager. If approved, the Surveyor/Biologist can reduce the demarcated buffer.

A Surveyor/Biologist 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 Monitor shall send weekly monitoring reports to LAUSD OEHS CEQA Project Manager during the grubbing and clearing of vegetation, and shall notify LAUSD immediately if project activities damage avian nests.

Bird Surveys - Construction, Demolition, or Vegetation Removal at Existing Campuses

- If avoidance of the avian breeding season is not feasible, the Surveyor/Biologist with survey experience shall conduct a nesting bird surveys to determine if active nests are within or adjacent to the work area.
- The survey shall be conducted no more than 3 days prior to construction activities. A memo describing results of the survey shall be submitted to the OEHS CEQA Project Manager.
- If an active bird nest is observed, the Surveyor/Biologist shall determine the appropriate buffer around the nest. Buffers are determined on species-specific requirements and nest location.
- The Monitor shall send weekly monitoring reports to LAUSD OEHS CEQA Project Manager.
- No construction activity shall occur within the buffer zone until nest is vacated, juveniles have fledged, and there is no evidence of a second attempt at nesting.

Bat Surveys

- Bat species inventories and habitat use studies shall be completed for demolition or new construction projects in native habitat as well as projects that require the removal of mature conifer, cottonwood, sycamore or oak trees or abandoned buildings.
- Bat surveys must be conducted by a qualified bat Surveyor or Biologist (Surveyor/Biologist). The Surveyor/Biologist shall use the appropriate combination of structure inspection, sampling, exit counts, and acoustic monitors to survey an area that may be affected by the project.

	• If bats are found, the Surveyor/Biologist shall identify the species and evaluate the colony to determine potential impacts.
	• Mitigation measures shall be determined on a project-specific basis and may include:
	  o Avoidance
	  o Humane exclusion prior to demolition
	  ▪ Bats should not be evicted from roost sites during the reproductive period (May-September), or during winter hibernating periods to avoid direct mortality
	  ▪ Bats should be flushed from trees prior to felling or trimming.
	Off-site habitat improvements shall be conducted in coordination with the California Department of Fish and Wildlife.

SC-BIO 4	LAUSD shall comply with the following conditions if a new school would be located in an area containing native habitat or if a protected tree would be removed from an existing campus:
	
	New Construction in Native Habitat
	LAUSD shall avoid constructing new schools in areas containing mature native protected trees to the extent feasible. If site avoidance is not feasible, individual trees should be protected. If protected trees may be impacted, the following condition(s) may be required:
	• **Translocation of rare plants is prohibited in most instances.** CDFW, in most cases does not recommend translocation, salvage, and/or transplantation of rare, threatened, or endangered plant species, in particular oak trees, as compensation for adverse effects because successful implementation of translocation is rare. Even if translocation is initially successful, it will typically fail to persist over time.
	• **Permanent conservation of habitat.** To ensure the conservation of sensitive plant species, the preferred method is permanent conservation of habitat containing these species; any translocation proposed shall only be an experimental component of a larger, more robust plan.
	• **Off-site acquisition of woodland habitat.** Due to the inherent difficulty in creating functional woodland habitat with associated understory components, the preferred method is off-site acquisition of woodland habitat in the local area. All acquired habitat shall be protected under a conservation easement and deeded to a local land conservancy for management and protection.
	• **Creation of woodlands**. Any creation of functioning woodlands shall be of similar composition, structure, and function of the affected woodland. The new woodland shall mimic the function, demonstrate recruitment, plant density, canopy, and vegetation cover, as well as other measurable success criteria before the measure is deemed a success.
	  o 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 may be purchased from a supplier that specializes in native seed collection and propagation. This method should reduce the risk of introducing diseases and pathogens into areas where they might not currently exist.
	  o Woodland species should be replaced by planting seeds. Monitoring efforts, including the exclusion of herbivores, shall be employed to maximize seedling survival during the monitoring period.
	  o Monitoring period for woodlands shall be at least 10 years with a minimum of 7 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.

	LAUSD shall request CDFW review and comment on any translocation plans, habitat preservation, habitat creation and/or restoration plans. **Removal of Protected Trees on Existing Campuses** LAUSD shall comply with the LAUSD OEHS Tree Trimming and Removal Policy. This policy ensures the management of District trees while ensuring that District activities will not conflict with locally adopted tree preservation policies and ordinances
SC-BIO-5	LAUSD shall comply with CDFW recommendations: • 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 pursuant to the USFWS wetland definition. • Implementation of recommended measures shall compensate for affected mature riparian corridors and loss of function and value of wildlife corridors.

The Campus is fully developed and does not contain any habitat to support candidate, sensitive, or special status species. Special-status plant and wildlife species are those that are candidates, proposed, or listed as threatened or endangered by the U.S. Fish and Wildlife Service (USFWS) or the California Department of Fish and Wildlife (CDFW) and plant species that are considered sensitive by the California Native Plant Society. The proposed Project site is in the northwestern-most portion of the Los Angeles, California U.S. Geological Survey (USGS) 7.5-minute topographic quadrangle. According to searches of the CDFW California Natural Diversity Database,[64] there are 12 species within a 1-mile vicinity of the Project site that are considered special-status by local, State and/or federal agencies. The Project site does not contain suitable habitat necessary to support special-status wildlife species or designated critical habitat for any species listed as rare, threatened, or endangered pursuant to the federal Endangered Species Act.

According to a search of the USFWS National Wetlands Inventory (NWI)[65] and site assessment, there are no federally or State protected wetlands or Waters of the U.S. within the Project site as defined by Section 404 of the Clean Water Act or Section 1600 of the State Fish and Game Code.

As a fully developed and urbanized area, the Project site does not serve as a migratory corridor or nursery site capable of facilitating the movement of any native resident or migratory fish or wildlife species. However, mature trees may provide habitat for nesting birds afforded protection pursuant to the Migratory Bird Treaty Act (MBTA). The nearest identified habitat linkage occurs in the Los Angeles River, which is approximately 0.6 mile southwest, outside the potential impact area for the proposed Project.

The Arborist Report inventoried a total of 120 mature trees within the Project site afforded protection pursuant to the LAUSD OEHS Tree Trimming and Removal Procedure or any other local ordinances or policies

[64] California Department of Fish and Wildlife. 2023. Rarefind 5: California Natural Diversity Database.
[65] https://fwsprimary.wim.usgs.gov/wetlands/apps/wetlands-mapper/. Accessed August 9, 2023.

protecting biological resources (Appendix C). Of the 120 landscape trees on the campus, 116 are "significant" and four are "protected" (see Figure 11). The four "protected" landscape trees within the campus are:

- #5 (Western sycamore [*Platanus racemosa*] near intersection of Moss Avenue and Roswell Street; this area would not be demolished)
- #16 (Western sycamore near Shop #3 Building; this area would remain as-is)
- #67 (Western sycamore northwest of the Administration Building; this tree would need to be removed)
- #115 (Coast live oak [*Quercus agrifolia*] between the basketball courts and Marguerite Street; this area would remain as-is)

A site visit was conducted on July 5, 2023. Around the Project site, the landscape sidewalk trees within the public right-of-way include Western sycamore and Coast live oak trees. Although the Site Analysis & Program Development Report does not specify whether these four trees are natural or part of a landscaping plan, based on the July 2023 site visit, they appear to be planted trees.

The Project site is not located within any existing or proposed Habitat Conservation Plan (HCP); Natural Community Conservation Plan (NCCP); or other approved local, regional, or State habitat conservation plan.

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

No Impact. The proposed Project would result in no impact to biological resources related to a substantial adverse effect directly or through habitat modification on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulation or the CDFW or USFWS. The proposed Project site is located within a highly anthropogenically modified area of the City of Los Angeles and is encompassed by existing infrastructure. A records search confirmed no known historical occurrences for special status species within the boundaries of the proposed Project site. A records search identified 12 different species (five birds, three mammals, two invertebrates, one plant, and one reptile) with known historical occurrences within 1 mile of the proposed Project site. The Campus is characterized by existing buildings, expansive paved areas with little to no tree canopy coverage and a lack of landscape uniformity, with only a handful of planting areas. The proposed Project site does not contain suitable habitat for the 12 special-status species identified to occur within 1 mile of the proposed Project site. Similarly, the adjacent parcels are designated as General Plan land use designations for the properties surrounding the Project site include "Medium Residential" to the north, "Neighborhood Commercial" to the east and southeast, "Low Medium I Residential" to the south and southwest, and "Low Medium II Residential" to the west and northwest would not be expected to contain suitable habitat either. The nearest known occupied habitat for a sensitive species of plant or wildlife is the Los Angeles River, which contains riverine and riparian habitat and is located roughly 0.6 mile to the south of the proposed Project site. There is no proposed or designated critical habitat with the proposed Project site or adjacent parcels; therefore, there is no impact to USFWS-designated Critical Habitat. The nearest USFWS-designated Critical Habitat is for the Coastal California Gnatcatcher, approximately 10 miles to the southeast.

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The proposed Project would have no adverse effect on any candidate, sensitive, or special status species or designated Critical Habitat, and no mitigation or further analysis is warranted.

b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations or by the California Department of Fish and Wildlife or the U.S. Fish and Wildlife Service?

No Impact. The proposed Project would result in no impact to biological resources in terms of having a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or afforded protection by the CDFW or USFWS. Sensitive communities are defined as providing suitable habitat for species regulated by local, State, or Federal resource agencies. The approximately 11.2-acre Campus currently contains 11 permanent buildings and six portable buildings (see Figure 6). The Campus is characterized by expansive paved areas with little tree canopy coverage and a lack of landscape uniformity, with only a handful of planting areas. As a result of a review of available historic records and maps, it has been determined that there are no sensitive natural communities, woodlands, coastal sage scrub, chaparral, natural drainages, or riparian habitat within the proposed Project, or in the adjacent parcels. The closest sensitive natural community is California Black Walnut Forest, located approximately 2.7 miles southeast of the site. The proposed Project would result in no substantial adverse changes to riparian habitat and other sensitive natural resources, and no mitigation or further analysis is warranted.

c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

No Impact. The proposed Project would result in no impact to biological resources regarding having a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means. The proposed Project site is fully developed with asphalt and concrete, primarily lawn and ornamental tree landscaping, an artificial turf soccer field, and existing buildings; and there are no wetlands, streams, or other riparian or aquatic habitats present on the site. The USGS 7.5 minutes series Los Angeles topographic quadrangle and the NWI were reviewed, and there are no state or federally protected wetlands located within the proposed Project property or adjacent parcels. The Los Angeles River is the nearest state or federally protected wetlands and is located approximately 0.6 mile southwest of the proposed Project site. There would be no substantial adverse changes to these wetlands or any other areas potentially subject to 1600 or 404 jurisdictions. No mitigation or further analysis is warranted.

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

Less than Significant Impact. The proposed Project would result in less than significant impacts to biological resources regarding interfering substantially with the movement of any native resident or migratory fish and/or wildlife species or with established native resident or migratory wildlife corridors or impede the use of native wildlife nursery sites. Important areas that facilitate wildlife movement are limited to foothills, streambed, canyon, ridgelines, and hillside areas. There are no prominent topographic or vegetative features associated with

or surrounding the Project area that would funnel wildlife through the area; nor is there any contiguous natural habitat through which wildlife would be expected to move through. The nearest potential wildlife corridors are within the Los Angeles River, which is approximately 0.6 mile southwest of the proposed Project site.

However, the proposed Project site has the potential to provide breeding habitat for birds afforded protection pursuant to the MBTA during the breeding season (February 1 through August 31). There are 120 mature trees on the campus. It is anticipated that at least 48 trees, including #67 (Western sycamore), would be removed, and additional trees would be located near construction activities (see Appendix C). Tree removal, building demolition, and construction-related noise and vibration may have the potential to disrupt birds that are nesting in the trees or buildings during breeding season. Therefore, construction activities (including demolition and tree removal) have the potential to impact nesting birds. However, the proposed Project would implement SC-BIO 3 so that removal of the trees shall occur outside of the nesting season. If avoidance of breeding season is not feasible, implementation of SC-BIO 3 including pre-construction clearance surveys, monitoring of nesting birds during vegetation clearing, and protective buffer zones surrounding observed nests during construction activities would reduce impacts to less than significant. No mitigation or further study is required.

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

Less than Significant Impact. The proposed Project would result in less than significant impacts after the incorporation of LAUSD Standard Conditions of Approval SC-BIO 1 through 5 in relation to conflicts with local policies or ordinances protecting biological resources. Per the LAUSD Tree Trimming and Removal Procedure guidelines, "protected" trees include all indigenous oaks species (excluding scrub oak), western sycamore, American sycamore, Southern California black walnut, and California bay laurel , if they measure 4 inches or more in cumulative diameter at 4.5 feet above ground level at the base of the tree and were not grown as part of a tree planting program.[66] A "significant" tree is any tree with a trunk diameter of 8 inches or larger. Four protected trees are within the boundaries of the proposed Project site, including one oak tree and three western sycamore trees. An additional 116 trees were identified as "significant" within the proposed Project site boundaries (see Appendix C). It is anticipated that at least 48 trees, including #67 (western sycamore), would be removed, and additional trees would be located near construction activities. In accordance with SC-BIO 4, any relocation or removal of protected or significant tree species within the proposed Project would be subject to the LAUSD tree trimming and removal procedure guidelines, which requires submittal of a Tree Removal Application and approval by the Director of OEHS and replacement equivalent to the City of LA Tree Preservation Ordinance requirements.

No Wildflower Reserve Areas, Significant Ecological Areas, or Coastal Resource Areas overlap the Project site boundaries. Tree removal, building demolition, and construction-related noise and vibration may have the potential to disrupt birds that are nesting in the trees or buildings during breeding season. Therefore, construction activities (including demolition and tree removal) have the potential to impact nesting birds. However, the proposed Project would implement SC-BIO 3 so that removal of the trees will occur outside of the nesting season. If avoidance of breeding season is not feasible, implementation of SC-BIO 3 including pre-

[66] Los Angeles Unified School District Office of Environmental Health & Safety. Revised April 24, 2023. Tree Trimming & Removal Procedure. https://www.lausd.org/cms/lib/CA01000043/Centricity/Domain/135/LAUSD_Tree_Protection.pdf

construction clearance surveys, monitoring of nesting birds during vegetation clearing, and protective buffer zones surrounding observed nests during construction activities would reduce impacts to less than significant.

Impacts would be less than significant after implementation of LAUSD Standard Conditions of Approval SC-BIO 1 through 5.

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?

No Impact. The proposed Project would result in no impact to biological resources regarding conflicts with the provisions of an adopted HCP; NCCP; or other approved local, regional, or State habitat conservation plan. The closest HCP or NCCP is the Orange County Transportation Authority NCCP/HCP, located more than 10 miles from the proposed Project site. The proposed Project would result in no substantial adverse changes to biological resources in terms of conflicts with the provisions of an HCP, NCCP or other local, regional, or state habitat conservation plan. No mitigation or further analysis is warranted.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
V. CULTURAL RESOURCES: Would the project:				
a. Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?	☒	☐	☐	☐
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?	☐	☐	☒	☐
c. Disturb any human remains, including those interred outside of dedicated cemeteries?	☐	☐	☒	☐

Explanation:

LAUSD has SCs for minimizing impacts to cultural resources. Applicable SCs related to cultural resources impacts associated with the proposed Project are provided below:

LAUSD Standard Conditions of Approval	
SC-CUL-1	**Historic Architect** For projects involving structural upgrades to historic resources, the Design Team shall include a qualified Historic Architect with demonstrated project-level experience in historic projects. For campuses with qualifying historical resources under CEQA, the Design Team shall include a LAUSD-qualified Historic Architect. 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. Throughout the project design progress the Historic Architect shall provide input to ensure compliance with the Secretary of the Interior's Standards for the Treatment of Historic Properties and LAUSD requirements and guidelines for the treatment of historical resources. Role of the Historic Architect The tasks of the Historic Architect on the Design Team shall include, but are not limited to: • The Historic Architect shall work with the Design Team (including the Structural Engineer) and LAUSD to ensure that project components, including new construction and modernization of existing facilities, comply with the Secretary of the Interior's Standards for the Treatment of Historic Properties and LAUSD Design Guidelines and Treatment Approaches for Historic Schools. The Historic Architect shall work with the Design Team and LAUSD throughout the design process to develop project options that facilitate compliance with the applicable historic preservation standards. • For new construction, the Historic Architect shall work with the Design Team and LAUSD to identify options and opportunities for: (1) ensuring compatibility of scale and character for new construction, site and landscape features, and circulation corridors, and (2) ensuring that new construction is designed and sited in such a way that reinforces and strengthens, as much as feasible, character-defining site plan features, landscaping, and circulation corridors throughout campus. • For modernization and upgrade projects involving contributing (significant) buildings or features, the Historic Architect shall work with the Design Team and LAUSD to ensure that specifications for design and implementation of projects comply with the applicable historic preservation standards.

	• The Historic Architect shall participate in Design Team meetings during all phases of the project through 100% construction drawings, pre-construction, and construction phases, as applicable. • The Historic Architect shall prepare a memo at the 50% and at the 100% 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 shall be submitted to LAUSD OEHS for review. • The Historic Architect shall participate in pre-construction and construction monitoring activities, as appropriate, to ensure continuing conformance with Secretary's Standards and/or avoidance of a material impairment of the historical resources. • The Historic Architect shall provide specifications for architectural features or materials requiring restoration or removal, maintaining and protecting relevant features in place, or on-site storage. Specifications shall include detailed drawings or instructions where historic features may be impacted. • The Design Team and Historic Architect shall be responsible for incorporating LAUSD's recommended updates and revisions during the design development and review process.
SC-CUL-2	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. The Design Team, Historic Architect, and Construction Contractor shall apply LAUSD School Design Guide and LAUSD Design Guidelines and Treatment Approaches for Historic Schools and the Secretary's Standards for all new construction and modernization projects. In keeping with the District's adopted policies and goals, historical resources shall be reused rather than destroyed, where feasible. General guidelines include: • Retain and preserve the character of historic resources. • Repair rather than remove, replace, or destroy character-defining features; if replacement is necessary, replace in-kind to match materials, dimensions, and appearance. • Treat distinctive architectural features or examples of skilled craftsmanship that characterize a building with sensitivity. • Where practical, conceal reinforcement required for structural stability or the installation of life safety or mechanical systems. Where necessary to halt deterioration and after the preparation of a condition assessment, undertake surface cleaning, preparation of surfaces, and other projects involving character-defining features using the least invasive, gentlest means possible. Avoid using any abrasive materials or methods including sandblasting and chemical treatments.
SC-CUL-3	Prior to any major alteration to or adjacent to a historic resource that may potentially damage historic resources (or previously identified historic features), the Historic Architect shall develop a Temporary Protection Plan that identifies potential risks to the historic resource. The Temporary Protection Plan shall be prepared in coordination with the Construction Contractor and LAUSD prior to demolition or construction. The Temporary Protection Plan may include, but not be limited to, the following components: • Notation of the historic resource on construction plans. • Pre-construction survey to document the existing physical condition of the historic resource.

	• Procedures and timing for the placement and removal of temporary protection features, around the historic resource. • Monitoring of the installation and removal of temporary protection features by the Historic Architect, or designee. • Post-construction survey to document the condition of the historic resource after Project completion. • Preparation of a technical memorandum documenting the pre-construction and post-construction conditions of the historic resource and compliance with protective measures outlined Temporary Protection Plan.
SC-CUL-4	Prior to significant alteration or demolition of a historical resource, LAUSD shall retain an Architectural Photographer and/or a Historian or Architectural Historian who meet the Secretary of the Interior's Professional Qualifications Standards and who shall prepare a HABS-like Historic Documentation Package (Package). The Package shall include photographs and descriptive narrative. Documentation will draw upon primary- and secondary-source research including available studies prepared for the property (measured drawings are not required). The specifications for the Package include: • **Photographs:** Photographic documentation shall focus on the historical resources/features proposed to be significantly altered or demolished, with overview and context photographs for the campus and adjacent setting. A professional-quality camera will be used to take photographs of interior and exterior features of the buildings. Photographs will include context views, elevations/exteriors, architectural details, overall interiors, and interior details (if warranted). Digital photographs will be in black and white (as well as in color or as requested by the District) and provided in an electronic format. • **Descriptive and Historic Narrative:** The Historian or Architectural Historian shall prepare descriptive and historic narrative of the historical resources/features. 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, history of the area, and historic context. In addition, the narrative will include a methodology section specifying the name of researcher, date of research, and sources/archives visited, as well as a bibliography. Within the written history, statements shall be footnoted as to their sources, where appropriate. **Historic Documentation Package Submittal:** Upon completion of the descriptive and historic narrative, all materials will be compiled in electronic format and presented to LAUSD for review and comment. Upon approval, one electronic copy and one hard copy shall be submitted to LAUSD OEHS. Photographs will be individually labeled and provided to LAUSD in electronic format.
SC-CUL-5	LAUSD shall comply with Design Specification 01 3591, Historic Treatment Procedures, as applicable. This Specification requires the Construction Contractor to submit a Historic Treatment Plan to the District for the protection, repair, and replacement of historic materials and features.
SC-CUL-6	LAUSD shall retain a qualified Archaeologist to be available on-call. The Archaeologist shall meet the Secretary of the Interior's Professional Qualifications Standards (48 Federal Register 44738–39). The archaeologist must have knowledge of both prehistoric and historical archaeology. To reduce impacts to previously undiscovered buried archaeological resources, following completion of the final grading plan and prior to any ground disturbance, a qualified archaeologist shall prepare an Archaeological Monitoring Program as described under SC-CUL-7.

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SC-CUL-7	The Construction Contractor shall halt construction activities within a 30 foot radius of the find and shall notify the LAUSD.
	• LAUSD shall retain an Archaeologist that meets the Secretary of the Interior's Professional Qualifications Standards (48 Federal Register 44738–39). The archaeologist must have knowledge of both prehistoric and historical archaeology.
	• The Archaeologist shall have the authority to halt any project-related construction activities that could impact potentially significant resources.
	• The Archaeologist shall be afforded the necessary time to recover and assess the find. Ground-disturbing activities shall not continue until the discovery has been assessed by the Archaeologist. With monitoring, construction activities may continue on other areas of the project site during evaluation and treatment of historic or unique archaeological resources.
	• If the find is determined to be of value, the Archaeologist shall prepare an Archaeological Monitoring Program and shall monitor the remainder of the ground-disturbing activities.
	• Significant archaeological resources found shall be curated as determined necessary by the Archaeologist and offered to a local museum or repository willing to accept the resource.
	• Archaeological reports shall be submitted to the South Central Coastal Information Center at the California State University, Fullerton.
	• The Archaeological Monitoring Plan shall include:
	  ○ Extent and duration of the monitoring based on the grading plans
	  ○ At what soil depths monitoring of earthmoving activities shall be required
	  ○ Location of areas to be monitored
	  ○ Types of artifacts anticipated
	  ○ Procedures for temporary stop and redirection of work to permit sampling, including anticipated radius of suspension of ground disturbances around discoveries and duration of evaluation of discovery to determine whether they are classified as unique or historical resources
	  ○ Procedures for maintenance of monitoring logs, recovery, analysis, treatment, and curation of significant resources
	  ○ Procedures for archaeological resources sensitivity training for all construction workers involved in moving soil or working near soil disturbance, including types of archaeological resources that might be found, along with laws for the protection of resources. The sensitivity training program shall also be included in a worker's environmental awareness program that is prepared by LAUSD with input from the Archaeologist, as needed.
	  ○ Accommodation and procedures for Native American monitors, if required.
	  ○ Procedures for discovery of Native American cultural resources.
	• The construction manager shall adhere to the stipulations of the Archaeological Monitoring Plan.

SC-CUL-8	Cultural resources sensitivity training shall be conducted for all construction workers involved in ground-disturbing activities. This training shall review the types of archaeological resources that might be found, along with laws for the protection of resources and shall be included in a worker's environmental awareness program that is prepared by LAUSD with input from a qualified Archaeologist, as needed.
SC-CUL-9	LAUSD shall determine whether it is feasible to prepare and implement a Phase III Data Recovery/Mitigation Program. If feasible, the Archaeologist shall prepare a Phase III Data Recovery/Mitigation Program to outline procedures to recover a statistically valid sample of the archaeological remains and to document the site and reduce impacts 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 to oversee the ground-disturbing activities to ensure that construction proceeds in accordance with the 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 and the local Native American representative has been contacted and consulted to assist in the accurate recordation and recovery of the resources.
SC-CUL-11	LAUSD shall retain a Paleontological Monitor to oversee specific ground-disturbing activities as determined by the scope of work and final grading plan. The 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, the Construction Contractor shall halt construction activities within a 30 foot radius of the find and shall notify the LAUSD. • Ground-disturbing activities shall not continue until the discovery has been assessed by the Paleontologist. • The paleontologist shall have the authority to halt construction activities to allow a reasonable amount of time to identify potential resources. • Significant resources found shall be curated as determined necessary by the Paleontologist.

a) Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?

Potentially Significant Impact. As documented in the HRER (Appendix B), the Campus is eligible for federal, state, or local, designation, and is considered a historical resource for the purpose of CEQA.[67] Irving MS was given a status code of 3S, or recommended eligible for listing in the National Register of Historic Places (NRHP), through survey evaluation.[68] A historic resources technical report will be prepared as part of the Draft EIR, which will evaluate the potential for implementation of the Project to substantially change the significance of an identified historical resource and will include mitigation measures and/or alternatives to reduce impacts to historical resources, if necessary.

b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?

Less than Significant Impact. Implementation of the proposed Project would cause less than significant impacts in relation to causing a substantial adverse change in the significance of an archaeological resource. As documented in the Updated Program EIR and confirmed in an updated record search at the South Central Coastal Information Center (SCCIC), there are no known archaeological resources on or within a quarter mile radius of the proposed Project site. The SCCIC record search indicates that there is one report within the project area and five within a quarter mile radius. Although it is unlikely that archeological resources are present on the proposed Project site, it is possible that construction activity could unearth archaeological resources. If archaeological resources are discovered during construction, LAUSD shall implement standard conditions SC-

[67] Marilyn Novell, Shannon Davis. August 24, 2022. Final Historic Resource Evaluation Report for Irving Middle School, Los Angeles, California

[68] Heumann, Leslie, & Associates, and Anne Doehne 2002 Historic Schools of the Los Angeles Unified School District. Science Applications International Corporation, a presentation prepared for LAUSD Facilities Services Division (March 2002)

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CUL-6 through -9 for evaluation and appropriate treating the archaeological resources. Therefore, the impacts would be less than significant. No mitigation or further study is required.

c) Disturb any human remains, including those interred outside of formal cemeteries?

Less than Significant Impact. The proposed Project would result in less than significant impacts in relation to disturbing any human remains, including those interred outside of formal cemeteries. Based on a review of USGS topographic maps, an updated records search at the SCCIC, and the known history of use of the site there has not been a formal cemetery on the site and there is a low potential to encounter human remains in relation of the historic land uses of the site, including occupation by indigenous people. Although unlikely, it is possible that construction activity could unearth previously unknown human remains. If human remains are unearthed during construction, the LAUSD shall implement the process specified by SC-CUL-10 and Section 7050.5 of the California Health and Safety Code. The Los Angeles County Coroner shall be notified, and no further disturbance shall occur until the County Coroner has made the necessary findings as to the origin and disposition. Therefore, the impacts would be less than significant. No mitigation or further study is required.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
VI. Energy: Would the project:				
a. Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	☐	☐	☒	☐
b. Conflict with or obstruct a state or local plan for renewable energy efficiency?	☐	☐	☐	☒

Explanation:

The proposed Project would comply with CHPS green building criteria[69] and LAUSD policies.[70] The proposed Project is designed to meet CHPS criteria for energy performance and LAUSD sustainability guidelines, with implementation of an energy management system. LAUSD is a current member of the CHPS (since 2001) and consistently applies sustainable construction principles as part of its development criteria. CHPS criteria were established for the development of high-performance schools to create a better educational experience for students and teachers by designing the best facilities possible. CHPS-designed facilities are planned to be healthy, comfortable, energy efficient, material efficient, easy to maintain and operate, commissioned, environmentally responsive site, a building that teaches, safe and secure, community resource, stimulating architecture, and adaptable to changing needs.

Electrical Power. Electrical power in the City of Los Angeles, including the Project site, is supplied by the Los Angeles Department of Water and Power (LADWP). Electricity provided by the LADWP is generated from a diverse mix of power sources, including coal, natural gas, nuclear, and large hydropower, in addition to renewable sources such as wind, solar, small hydroelectric, biomass & bio-waste, and geothermal. The 2022 Strategic Long-Term Resource Plan, a 25-year roadmap, provides guidance for the LADWP's Power System to supply reliable and cost-effective electricity to attain 100 percent carbon-free energy system by 2035. Overhead electrical distribution lines (110–161 kilovolt) operated by Southern California Edison closest to the proposed Project are located approximately 40 feet southeast, along the northern, western, and eastern edges of the perimeter of and opposite of Margurette Street, along the southern edge of the roadway.[71]

Henderson Engineers prepared a site analysis report in 2023 that characterized baseline conditions for energy resources on-site.[72] Power distribution for the campus is provided by an outdoor 480 volt (V), three phase, four wire, 2,500 ampere (amp) 65KAIC main switchboard. The switchboard provision date and manufacturer is currently unknown but was revised from its original campus construction. It is located at the south-east quadrant of the campus along Marguerite Street. There are two electrical service locations on campus. The main

[69] Collaborative for High Performance Schools. N.d. CHPS Criteria. https://chps.net/chps-criteria
[70] Los Angeles Unified School District. June 8, 2015. Policy Bulletin: Energy and Resource Conservation Policy. http://learninggreen.laschools.org/uploads/8/0/0/0/8000811/bul-6513_energyconservationpolicy.pdf
[71] California Energy Commission. 2023. California Electric Infrastructure App. Available at: https://www.energy.ca.gov/maps/
[72] Henderson Engineers. February 2023. MEP – Site Summary – 10372111. Irving STEAM Magnet Middle School, 3010 Estara Avenue, Los Angeles CA 90065. Prepared for LAUSD.

electrical service yard is located south between the existing basketball courts and new classroom buildings, just north of Marguerite Street. The secondary electrical service is located along the northwestern perimeter of the site.

Water Consumption. Water supply in the City of Los Angeles, including the Project site, is supplied by LADWP. Substantial energy is required to pump and transport water into the Los Angeles basin. Source water extraction, treatment and local distribution also require significant amounts of energy. The Los Angeles Aqueduct, local groundwater, and supplemental water purchased from the Metropolitan Water District of Southern California (MWD) are the primary sources of water for the city. LADWP has initiated a study to determine the nexus between water and energy consumption, and to evaluate the associated carbon footprint of its water supply sources. The water purchased from MWD is the most energy intensive source of water for LADWP. This is followed by the local production of recycled water and the treatment of groundwater.[73] Because water supplies are declining due to environmental degradation, variable hydrology, and impacts from climate change, the LADWP is implementing recycled water programs, such as "operation NEXT water supply" to fill a larger portion of the city's water supply portfolio while reducing dependence on imported water. The first water meter is located on the east side of the school that connects to the Administration Building along Estara Avenue. The second water meter is located southeast of the school that connects to the Auditorium. The third water meter for the new classroom building is located on the southern side of the school along Marguerite Avenue.

The California Urban Water Management Planning Act (effective January 1, 1984) requires that every urban water supplier prepare and adopt an Urban Water Management Plan (UWMP) every 5 years. The LADWP's 2020 UWMP is the most recent plan available. It is the City's master plan for water supply and resources management and is consistent with the City's goals and policy objectives.[74] Total water demand varies from year to year and is influenced by population growth, weather, water conservation efforts, drought, and economic activity. From fiscal year (FY) 2012/13 through FY 2014/15, drought conditions triggered State and City mandatory conservation measures. This helped to reduce water use by 13 percent from FY 2013/14 to FY 2014/15, and average water demand between FY 2015/16 and FY 2019/20 was lower compared to 1970s recordings. Since 1991, the City of Los Angeles has recognized that water conservation is a foundation to improve water supply reliability. Water use must be characterized as either indoor or outdoor use in order to determine the potential for water use efficiency and target conservation programs. The city is currently aiming for a 25 percent per capita reduction in potable water by 2035 and strives to maintain the same reduction rate through 2050, using FY 2013/14 as a baseline.

Natural Gas. As stated in the SUP Program EIR, natural gas is provided to the City of Los Angeles including the Project site by the Southern California Gas Company (SoCalGas). SoCalGas obtains most of its natural gas supply from sources outside of California, primarily from basins in the southwestern United States and Canada, including the Rocky Mountains.[75] According to the SoCalGas website, SoCalGas owned or operated high-pressure distribution lines are located approximately 0.42 mile southwest of the Project site, along San Fernando

[73] Los Angeles Department of Water and Power. Approved April 29, 2021. 2020 Urban Water Management Plan. Available at: https://www.ladwp.com/cs/groups/ladwp/documents/pdf/mdaw/nzyy/~edisp/opladwpccb762836.pdf
[74] Los Angeles Department of Water and Power. Approved April 29, 2021. 2020 Urban Water Management Plan. Available at: https://www.ladwp.com/cs/groups/ladwp/documents/pdf/mdaw/nzyy/~edisp/opladwpccb762836.pdf
[75] California Gas and Electric Utilities. 2023. 2023 California Gas Report. Available at: https://www.socalgas.com/sites/default/files/Joint_Biennial_California_Gas_Report_2023_Supplement.pdf

Road.[76] Based on provided utility consumption report, the campus is served by a total of three gas meters. The first gas meter is located on the eastern side of the Administration Building off Estara Avenue. The second gas meter is located on the southern side of Building 2. The third gas meter is located along the southeastern perimeter of the Homemaking Building.

Petroleum Based Fuel. California currently imports two-thirds of its petroleum from out-of-state, and accounts for about 10 percent of U.S. gasoline and diesel consumption. California has continued its shift away from fossil fuels to zero-emission and near-zero-emission vehicles powered by renewable sources to achieve its climate goals, with the governor's goals to displace 1.5 billion gallons of petroleum fuels with 1.5 million zero-emissions vehicles by 2025.[77,78]

a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

Less than Significant Impact. The proposed Project would result in less than significant impacts related to wasteful, inefficient, or unnecessary consumption of energy resources.

Construction Phase

The proposed Project would ensure compliance with existing state and local plans by replacing outdated buildings with CHPS-design facilities. The facilities are designed with sustainability features provided by the guidelines; including "cool roof" building materials, lighting to reduce energy use and light pollution, water, and energy-efficient design. Construction of the proposed Project would create temporary increased demands for electricity and vehicle fuels. Transportation energy use depends on the type and number of trips, per capita vehicle miles traveled (VMT), fuel efficiency of vehicles, and travel mode. During construction, energy use would come from the transport and use of construction equipment, delivery vehicles, and construction employee vehicles that use diesel fuel or gasoline. Vehicles would fluctuate according to the phase of construction and would be temporary; the Contractor, pursuant to 13 CCR, Article 4.8, Chapter 9, Section 2249, shall minimize nonessential idling of construction equipment.

While off-road equipment would be required for construction activities proposed, certain activities would be limited to hand tools, such as power drills, and lighting, which require minimal electricity. Natural gas-powered-equipment would additionally be used for proposed activities, which would comply with SC-USS-1 (see *Utilities and Service Systems*, below), requiring the reuse, recycling, salvaging, or disposal of nonhazardous waste materials during demolition and new construction to foster material recovery and reuse, to minimize disposal in landfills. Los Angeles Municipal Code (LAMC) specific requirements sourced from the CALGreen code, including the required recycling of construction materials and energy efficiency standards, would apply to the proposed Project's construction activities The proposed Project is not anticipated to result in inefficient, wasteful, or unnecessary impacts of energy use during construction; impacts would be less than significant.

[76] Southern California Gas Company. n.d. Natural Gas Pipeline Map. Available at: https://socalgas.maps.arcgis.com/apps/webappviewer/index.html?id=c85ced1227af4c8aae9b19d677969335
[77] California Energy Commission. 2016. 2016 Integrated Energy Policy Report Update. Publication Number: CEC-100-2016-003-CMF. Available at: https://www.energy.ca.gov/2016_energypolicy/
[78] Office of the Governor of California. March 23, 2012. Executive Order B-16-2012. Available at: https://www.ca.gov/archive/gov39/2012/03/23/news17472/index.html

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Operational Phase

The proposed Project would result in no impacts during operations regarding wasteful, inefficient or unnecessary consumption of energy resources. The proposed Project's operational consumption of energy resources would include electricity and natural gas usage to power assets pertaining to landscaping maintenance, light fixtures, equipment, and similar functions. Operation of the proposed Project would consume energy, but would not introduce any new demand for electricity, natural gas, and transportation on the Project site. Existing uses include heating, cooling, and ventilation of buildings, water heating, operation of electrical systems, use of on-site equipment and appliances, and indoor/outdoor/perimeter lighting. The proposed Project would result in a reduced demand of energy use with the implementation of CHPS-design facilities.

Vehicular travel to and from the proposed Project site would also consume energy resources and include the use of personal vehicles for staff and student pickup and drop-offs, along with school buses for public travel and delivery trucks to maintain operations at the proposed Project site. The travel demand to and from the campus, and associated energy use, would not result in any changes to the existing condition on-site. The Program EIR provides that the school's capacity is not expected to increase, and energy demand would also not increase with implementation of the proposed Project. The proposed Project would also comply with SC-GHG-5 (see *Greenhouse Gas Emissions*, below), requiring the proposed Project to be at least 10 percent more energy efficient than the Building Efficiency Standards.

The proposed Project would result in less than significant impacts in relation to energy consumption and would result in a net benefit with incorporation of CHPS design and sustainability features. No further analysis is warranted.

b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

No Impact. The proposed Project would result in t no impact in relation to conflicts with or obstructions of a state or local plan for renewable energy or energy efficiency. Renewable sources of electricity include wind, small hydropower, solar, geothermal, biomass, and biogas. Electricity production from renewable sources is generally considered carbon neutral. The proposed Project is subject to the energy-efficient provisions of the current California Building Standards Code (CCR Title 24), CHPS criteria, and applicable CALGreen (CCR Title 24, Part 11) mandatory measures.[79] Construction and operation of the proposed Project would remove existing permanent and temporary buildings, to provide CHPS-design facilities.

Executive Order S-14-08, signed in November 2008, expanded the state's renewables portfolio standard (RPS) to 33 percent renewable power by 2020. This standard was adopted by the Legislature in 2011 (SB X1-2). The statewide RPS goal is not directly applicable to individual development projects, but to utilities and energy providers such as LADWP, which provides all the electricity needs for the proposed Project. The proposed Project would comply with LADWP in meeting the RPS goals by implementing energy efficient buildings to comply with the latest 2019 Building Energy Efficiency Standards and CALGreen, in addition to SC-GHG-5. The prosed Project would not conflict with any state or local plan and would implement more energy efficient and sustainability features. All SUP-related projects, including the proposed Project, have been designed in

[79] California Building Standards Commission. Effective January 1, 2023. 2023 California Green Building Standards Code. CALGreen (Part 11 of Title 24). Available at: http://www.bsc.ca.gov/Home/CALGreen.aspx

conformance with District Standards for energy efficiency and would comply with CHPS and LAUSD sustainability guidelines.

Since the proposed Project would result in improvements to energy use on the campus and address infrastructure vulnerabilities, the proposed Project would not result in conflicts with or obstructions of a state or local plan for renewable energy or energy efficiency, no impacts would occur. No further analysis is warranted.

4. Environmental Checklist and Analysis

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
VII. GEOLOGY AND SOILS. Would the project:				
a. Directly or indirectly cause 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 California Geological Survey Special Publication 42.)	☐	☐	☐	☒
ii. Strong seismic ground shaking?	☐	☐	☐	☒
iii. Seismic-related ground failure, including liquefaction?	☐	☐	☐	☒
iv. Landslides?	☐	☐	☐	☒
b. Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	☐	☐	☒	☐
d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994, as updated), creating substantial direct or indirect risks to life or property?	☐	☐	☒	☐
e. Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	☐	☐	☐	☒
f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☐	☒	☐

Explanation:

LAUSD has one SC for minimizing impacts to geology and soils. Applicable SCs related to geology and soils impacts associated with the proposed Project are provided below. The SC requiring the preparation of a Geohazard Assessment has been met through the preparation of the 2023 Geological Investigation for Irving Middle School Modernization by RMA Group (Appendix D, *Geotechnical Investigation*). The report contains geotechnical construction recommendations and procedures that must be followed as part of Project design.

LAUSD Standard Conditions of Approval	
SC-GEO-1	LAUSD shall prepare a Geohazard Assessment for the construction of any new school or applicable school addition.

a. Directly or indirectly cause 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 California Geological Survey Special Publication 42.)

No Impact. The proposed Project would result in no impacts in relation to the rupture of a known earthquake fault. The proposed Project site is located entirely within an Alquist Priolo Earthquake Fault Zone, with the Hollywood Fault and the Raymond Fault running beneath the campus, as mapped by the California Geological Survey.[80] As shown in **Figure 12: Geologic and Fault Map**, multiple known earthquake faults have been mapped beneath the Campus. The Hollywood Fault is estimated to be located in the southern corner of the Campus running west beneath the New Classroom Building and the Soccer Field; the Raymond Fault is estimated to be located in the north corner of the site running west beneath the Athletic Field; and a postulated fault is estimated to run west beneath the Homemaking Building, Classroom Building, Administration Building, and six bungalows (Appendix D). The proposed Project is being undertaken to alleviate existing structural and seismic deficiencies in Campus buildings and to address the risks associated with the postulated fault.

Due to the presence of known earthquake faults beneath the Campus, the existing conditions are characterized by potential fault rupture, particularly at the Homemaking Building, Classroom Building, Administration Building, and six bungalows. The Geotechnical Investigation states that the existing probability of surface rupture is moderate.

In addition to potential for fault rupture, three buildings on Campus (Administration Building, Auditorium, and Physical Education Building) have been found to have structural deficiencies.[81] The Administration Building has insufficient seismic gaps, overstressed shear walls, and diaphragm openings that are too large. The Auditorium has insufficient wall anchorage and diagonal sheathing at the diaphragm. The Physical Education Building was found to have overstressed shear walls and insufficient wall anchorage at the diaphragm. These buildings' existing structural deficiencies currently pose greater risks of loss, injury, or death than other buildings if fault rupture were to occur.

Although the proposed Project site has moderate potential for surface fault rupture, the proposed Project would reduce the potential for students and faculty to be exposed to rupture of the known earthquake fault.

[80] California Department of Conservation, California Geological Survey. N.d. Earthquake Zones of Required Investigation https://maps.conservation.ca.gov/cgs/EQZApp/app/ (accessed August 17, 2023)

[81] NAC Architecture for Los Angeles Unified School District. February 3, 2023. Irving Steam Magnet Middle School Site Analysis and Development Report.

As shown in Figure 10, the proposed Project would demolish or remove the buildings that are located directly above the postulated fault (Homemaking Building, Classroom Building, Administration Building, and six bungalows). By removing the buildings that are located directly over the fault, the proposed Project would greatly reduce the risk related to surface fault rupture. The proposed Project would replace the removed buildings with one new building that would be constructed at least 50 feet away from the known fault. No structures would be constructed above a known fault. Furthermore, the proposed Project would alleviate structural and seismic risks in other buildings on Campus, which would reduce their risk of damage if surface rupture were to occur nearby.

Furthermore, the proposed Project would not result in an increase of enrollment at Irving MS or accommodate more students or faculty; therefore, it would not expose more people to risk of loss, injury, or death than the existing conditions. Therefore, there would be no impact. No further analysis is warranted.

ii. Strong seismic ground shaking?

No Impact. The proposed Project would result in no impacts in relation to strong seismic ground-shaking. As previously stated, three known earthquake faults have been mapped beneath the campus (see Figure 12), including a postulated fault zone estimated to run west beneath the Homemaking Building, Classroom Building, Administration Building, and six bungalows. The proposed Project is being undertaken to alleviate existing structural and seismic deficiencies in Campus buildings and to address the risks associated with the postulated fault.

The existing conditions are characterized by potential for strong seismic ground shaking due to earthquakes. Generally, the most intense ground shaking occurs near the rupturing fault, indicating that the Homemaking Building, Classroom Building, Administration Building, and six bungalows are currently at risk for the strongest seismic ground shaking in case of earthquake. Risks associated with seismic ground shaking may be exacerbated under existing conditions by the structural deficiencies found in the Administration Building, Auditorium, and Physical Education Building.

Although the proposed Project site has the potential for seismic ground shaking, the improvements proposed would not result in a greater risk to students and staff on Campus than what currently exists. Rather, the proposed Project would reduce the potential for students and faculty to be exposed to strong seismic ground shaking.

By removing the buildings that are located directly over the fault (Homemaking Building, Classroom Building, Administration Building, and six bungalows) and constructing the new Administration and Classroom Building at least 50 feet away from the fault (see Figures 9 and 12), the proposed project would reduce the amount of ground shaking experienced during earthquakes. The proposed Project would also alleviate structural and seismic risks in other buildings on Campus, which would reduce their risk of damage due to strong seismic ground shaking.

Furthermore, the proposed Project would not result in an increase of enrollment at Irving MS or accommodate more students or faculty; therefore, it would not expose more people to risk of loss, injury,

or death than the existing conditions. Therefore, there would be no impact. No further analysis is warranted.

iii. Seismic-related ground failure, including liquefaction?

No Impact. The proposed Project would result in no impacts in relation to seismic-related ground failure, including liquefaction. Based on review of the Geotechnical Investigation (Appendix D) and the California Geological Survey, the site is not within a potential liquefaction hazard zone.[82] The Geotechnical Investigation performed calculations of liquefaction potential using peak ground acceleration, earthquake magnitude, depth to groundwater table, and soil boring results. Considering that the depth to ground water table for the liquefaction evaluation was 25 feet, the Geotechnical Investigation determined that no ground surface manifestations of liquefaction would be expected to occur. Similarly, the Geotechnical Investigation determined that seismically induced ground settlement would not be substantial. Therefore, there would be no impact. No further analysis is warranted.

iv. Landslides?

No Impact. The proposed Project would result in no impacts in relation to landslides. Based on review of the Geotechnical Investigation (Appendix D) and the California Geological Survey, the site is not within a potential earthquake-induced landslide hazard zone.[83] Additionally, the proposed Project site is not located within or immediately downslope of a landslide hazard area. The nearest landslide zone is approximately 0.4 mile east of the Campus. There is intervening topography and development, such as a freeway, between the Campus and the landslide zone. Considering this, the Geotechnical Investigation determined that the potential for seismically induced landslide within the proposed construction site is judged to be very low to nil. Therefore, there would be no impact. No further analysis is warranted.

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

Less than Significant Impact. The proposed Project would result in less than significant impacts in relation to substantial soil erosion or the loss of topsoil. The existing school has been developed with structures and pavement that cover the majority of the Campus. The proposed Project site comprises 11.2 acres of the Campus, not including City streets. Of this area, 25 percent is covered by structures and 35 percent is impermeable surfaces such as asphalt parking lots, play areas, and the synthetic turf field, which is installed over an asphalt play yard. Greenspace encompasses 20 percent of the Campus, and there is another 20 percent of the Project site dedicated to planting areas. The school's highest point is in the middle, and it slopes down in all directions at a rate of approximately one percent. The proposed Project's site's developed nature generally precludes it from being susceptible to erosion.

Construction Phase

Construction of the proposed Project (construction of a new building and removal and addition of hardscape/landscape) would result in ground surface disruption during excavation, grading, and trenching that

[82] California Department of Conservation, California Geological Survey. N.d. Earthquake Zones of Required Investigation https://maps.conservation.ca.gov/cgs/EQZApp/app/ (accessed August 17, 2023)
[83] California Department of Conservation, California Geological Survey. N.d. Earthquake Zones of Required Investigation https://maps.conservation.ca.gov/cgs/EQZApp/app/ (accessed August 17, 2023)

would create the potential for erosion to occur. The California State Water Resources Control Board regulates stormwater discharges from construction sites because of the potential to mobilize pollutants, including soil erosion. As the proposed Project site is greater than 1 acre, the proposed Project would be required to obtain coverage under the National Pollutant Discharge Elimination System (NPDES) General Permit for Stormwater Discharges Associated with Construction and Land Disturbance Activities.[84] Construction of the proposed Project would be regulated by the statewide construction general permit (CGP), as well as the LAUSD compliance checklist for Stormwater requirements at construction sites (SC-HWQ-2). Regulations as part of SC-HWQ-02 would require the construction contractor to implement BMPs in order to minimize erosion, sedimentation, and siltation. During construction, the proposed Project would control erosion and siltation with the implementation of a site-specific Stormwater Pollution Prevention Plan (SWPPP) and an Erosion and Sediment Control Plan that is part of the SWPPP. These regulations require that the site maintains all construction debris within a frequently inspected perimeter control, and that all open spaces and slopes are either actively undergoing construction or stabilized via erosion control BMPs. Therefore, the proposed Project would not result in substantial soil erosion or the loss of topsoil, and there would be less than significant impacts due to construction of the proposed Project. No further analysis is warranted.

Operational Phase

After construction of the proposed Project, the Campus ground cover would be similar to current conditions, covered primarily by structures and impermeable surfaces, which generally precludes it from being susceptible to erosion. There would be a minor increase in greenspace, planting areas, and landscaped features, which would be operated and maintained by LAUSD and would not result in soil erosion or loss of topsoil. Therefore, impacts would be less than significant. No further analysis is warranted.

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

Less than Significant Impact. The proposed Project would result in less than significant impacts in relation to being located on a geologic unit or soils that are 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.

Subsurface investigations conducted for the proposed Project's Geotechnical Investigation (Appendix D) encountered surficial asphalt and concrete typically between 2 to 4 inches thick and up to 6 inches of base. Excavations found a layer of artificial fill (disturbed soil from the onsite alluvium) across the Campus at a depth of 4 feet. This is consistent with the existing land use, which has been entirely developed as a school. Further excavation found the soil beneath Irving MS consisted of clay, silty sand, clayey sand, and clay. In certain borings across the campus, researchers found sandstone bedrock at 30 feet below ground surface. The Geotechnical Investigation did not discover a geologic unit or soil that is currently unstable or unsuitable for construction.

Geologic hazards related to unstable soils, such as lateral spreading, subsidence, collapse, liquefaction, or landslide, are not anticipated at the proposed Project site. The Geotechnical Investigation determined that

[84] California State Water Resources Control Board. August 17, 2023. "NPDES 2022 Construction Stormwater General Permit." https://www.waterboards.ca.gov/water_issues/programs/stormwater/construction/general_permit_reissuance.html

seismically induced ground settlement would not be substantial. Shrinkage is the decrease in the volume of soil upon removal and recompaction, and subsidence occurs as natural ground is densified to receive fill. These factors account for changes in earth volumes that would occur during grading. As stated in the Geotechnical Investigation, the construction contractor would be required to balance the earthwork near the completion of grading based on the degree to which fill soils are compacted and the variations in the existing soil densities.

The Geotechnical Investigation includes other earthwork and grading specifications that the construction contractor would be required to follow for all clearing and grubbing, removal of existing structures, preparation of land to be filled, filling of the land, spreading, compaction and control of the fill, and all subsidiary work. It includes specifications for placing and spreading engineered fill (including moisture, compaction, and slope specifications), ground preparation of the soils, suitable fill materials, excavations, and other construction requirements which would ensure that the proposed Project results in less than significant impacts.

As previously discussed, the proposed Project site is not at risk of landslides because it is not within or immediately downslope of a landslide hazard zone, and it is not at risk of liquefaction because it is not within a potential liquefaction hazard zone and the water table is approximately 25 feet below the surface.[85,86]

Consistent with SC-GEO-1, a detailed Project-specific Geotechnical Investigation was prepared. Incorporation of the recommendations of the Geotechnical Investigation into the design of the school and the construction of the proposed Project would ensure that any potential damage as a result of any encountered unstable soils would be reduced to below the level of significance. Therefore, the proposed Project would result in less than significant impacts in regard to being located on a geologic unit or soil that is unstable. No further analysis is warranted.

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

Less than Significant Impact. The proposed Project would result in less than significant impacts in relation to expansive soils. Consistent with SC-GEO-1, a detailed Project-specific Geotechnical Investigation was prepared. The Geotechnical Investigation conducted expansion testing performed in accordance with American Society for Testing and Materials (ASTM) D4829 Standard Test Method for Expansion Index of Soils. The expansion testing indicated that earth materials underlying the proposed Project site have a low expansion classification. As site grading would redistribute earth materials, the Geotechnical Investigation recommends that potential expansive properties be verified at the completion of rough grading. Incorporation of the recommendations of the Geotechnical Investigation into the design of the school and the construction of the proposed Project would ensure that any potential damage as a result of any encountered expansive soils would be reduced to below the level of significance. Therefore, impacts would be less than significant. No further analysis is warranted.

[85] California Department of Conservation, California Geological Survey. N.d. Earthquake Zones of Required Investigation https://maps.conservation.ca.gov/cgs/EQZApp/app/ (accessed August 17, 2023)
[86] RMA Group. Revised March 23, 2023. Geotechnical Investigation for Irving Middle School Modernization.

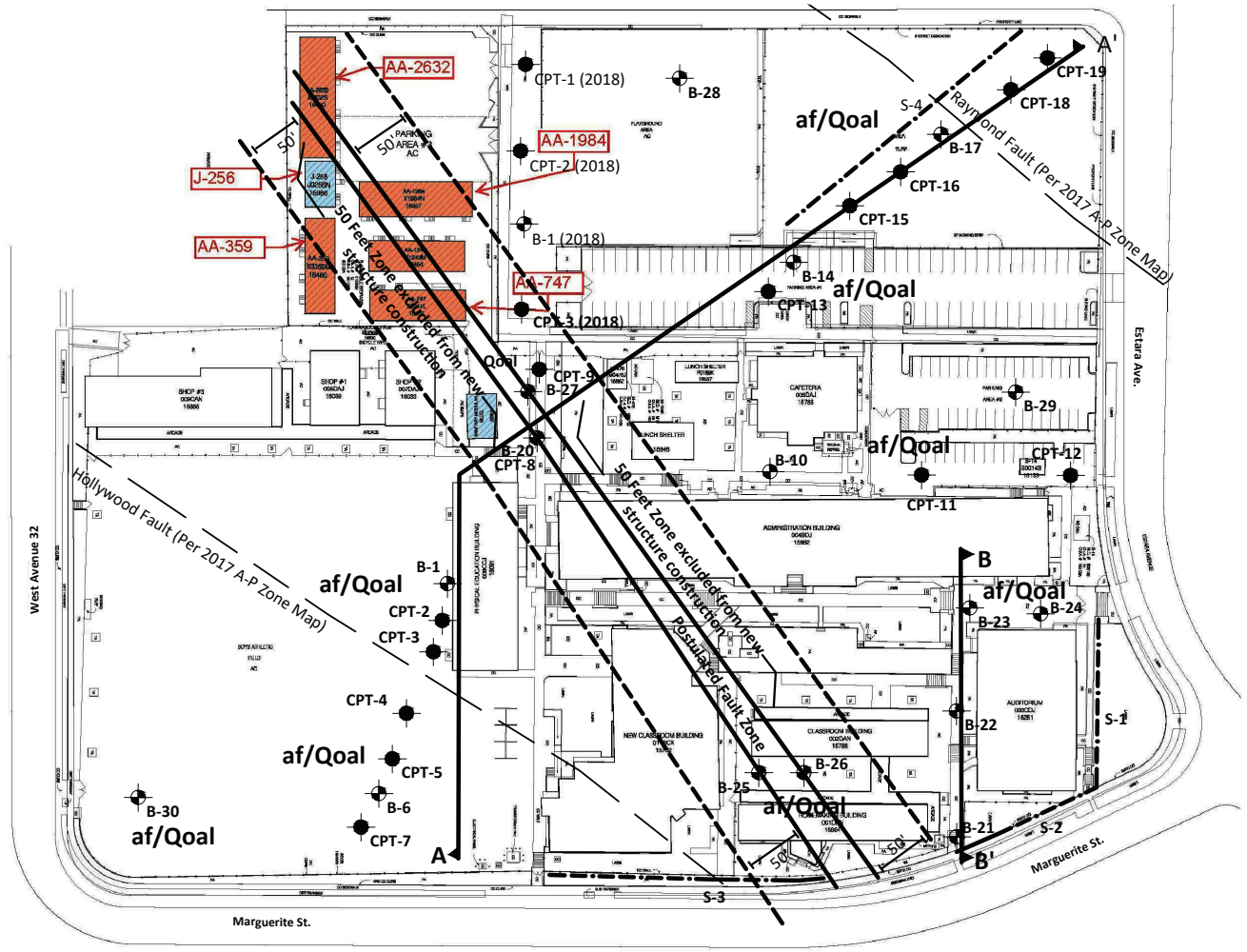
e. Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?

No Impact. The proposed Project would result in no impacts in relation to soils incapable of adequately supporting the use of septic tanks. The proposed Project's Site Analysis and Program Development Report states that the proposed Project site is served by City of Los Angeles sanitary sewer lines, including 8-inch pipes along Moss Avenue, Roswell Street, and Marguerite Street.[87] The proposed Project has not been designed to increase faculty or student enrollment; therefore, the proposed Project's water demand would not increase from current conditions, and the wastewater treatment provider would have adequate capacity to serve the Project's projected demand. Further, the proposed Project would not add any septic tanks or alternative wastewater disposal systems to the Campus because the existing sewage infrastructure would support the new building under the proposed Project. Therefore, there would be no impact. No further analysis is warranted.

f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic features?

Less than Significant Impact. The proposed Project would result in less than significant impacts to paleontological resources. As previously stated, the Geotechnical Investigation excavations found a layer of artificial fill (disturbed soil from the onsite alluvium) across the Campus at a depth of 4 feet (Appendix D). This is consistent with the existing land use, which has been entirely developed as a school. While most of the proposed Project site is underlain by previously disturbed soils due to development, construction of the new Classroom and Administration Building would require excavation and grading activities in areas that are currently parking and landscaped areas. These areas were previously disturbed at a shallower depth than that required for the proposed Project's new building. A record search conducted at the Natural History Museum indicates that there are no fossil localities within the Project area and five localities surrounding the Project area with the same sedimentary deposits (Appendix E, *Natural History Museum Record Search*). In the unlikely event that paleontological resources are discovered during construction, LAUSD shall implement SC-CUL-11 for evaluating and appropriately treating paleontological resources Therefore, while the proposed Project has a low potential to encounter paleontological resources during construction, it would not result in potentially significant impacts. No further analysis is warranted.

[87] NAC Architecture for Los Angeles Unified School District. February 3, 2023. Irving Steam Magnet Middle School Site Analysis and Development Report.



Geologic Legend

af/Qoal - Artificial Fill over Older Alluvium

Location of Seismic Lines (S-1)

- Approximate location of exploratory boring (B-1)

- Approximate location of CPT (CPT-1)

- Approximate fault location per Earthquake Fault Zone Map (2017)

- Geologic cross-section

Scale 1" = 85'

Optimized for printing at 11" x 17"

SITE GEOLOGIC MAP

SOURCE: RMA Group. February 15, 2022. Geotechnical Investigation for Irving Middle School Modernization.

FIGURE 12
Geologic and Fault Map

4. Environmental Checklist and Analysis

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

Explanation:

LAUSD has SCs for minimizing impacts to greenhouse gas emissions. Applicable SCs related to greenhouse gas emissions impacts associated with the proposed Project are provided below:

LAUSD Standard Conditions of Approval	
SC-GHG-1	During 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 designed time dependent valued energy shall be at least 10%, with a goal of 20% less than a standard design that is in minimum compliance with the California Title 24, Part 6 energy efficiency standards that are in force at the time the project is submitted to the Division of the State Architect.
SC-USS-1	Implementation of SC-USS-1.

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

Potentially Significant Impact. The Proposed Project would generate GHG emissions during temporary construction activities and long-term operations. Construction would result in short-term GHG emissions produced by construction equipment exhaust as well as on-road truck and other vehicle trips. While the Proposed Project would not increase the capacity of Roosevelt Elementary School, operation of the Proposed Project would result in GHG emissions from energy consumption. Therefore, this impact is

considered potentially significant and the EIR will evaluate the potential for the Proposed Project to generate a substantial increase in GHG emissions.

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

Potentially Significant Impact. The proposed Project would potentially result in significant impacts in relation to conflicting with an applicable plan, policy or regulation adopted for the purpose of reducing GHG emissions. The primary plans and policies applicable to the proposed Project include the CARB Scoping Plan,[88] and SCAG's Connect SoCal 2020.[89] The Proposed Project would emit GHGs during temporary construction activities and long-term operations. Therefore, this impact is considered potentially significant and the potential for the Proposed Project to conflict with applicable plans, policies, or regulations adopted for the purpose of reducing GHG emissions will be analyzed in the EIR.

[88] California Air Resources Board. December 2022. Final 2022 Scoping Plan. Available at: https://ww2.arb.ca.gov/our-work/programs/ab-32-climate-change-scoping-plan/2022-scoping-plan-documents

[89] Southern California Association of Governments. September 2020. Connect SoCal. Available at: https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocal-plan_0.pdf?1606001176

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
IX. HAZARDS AND HAZARDOUS MATERIALS. Would the project:				
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☒	☐	☐	☐
b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and/or accident conditions involving the release of hazardous materials into the environment?	☒	☐	☐	☐
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☒	☐	☐	☐
d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☒	☐	☐	☐
e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	☐	☐	☐	☒
f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?	☐	☐	☐	☒

Explanation:

LAUSD has SCs for minimizing impacts to hazards and hazardous materials. Applicable SCs related to hazards and hazardous materials impacts associated with the proposed Project are provided below:

LAUSD Standard Conditions of Approval	
SC-HAZ-1	LAUSD shall determine the proximity of electromagnetic field (EMF) generators to new classrooms or outdoor play areas to ensure the EMF generator does not pose a threat. **Criteria for School Siting in Proximity to High Voltage Power Lines or Cell Towers** Board of Education resolutions (Effects of Non-Ionizing Radiation-2000, Wireless Telecommunication Installations - 2009 and T-Mobile - Cell Tower Notification and Condemnation-2009) regarding electromagnetic field (EMF) and radio frequency exposures associated with cellular towers near schools whereby a prohibition exists regarding siting towers on school campuses. LAUSD's screening perimeter for new classroom construction or outdoor play area is 200 feet from cell towers and 500 feet from high voltage power lines.
SC-HAZ-2	LAUSD shall determine the proximity of new classrooms or outdoor play areas to ensure that these new facilities are placed outside of the established exclusion zone.

4. Environmental Checklist and Analysis

	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.
SC-HAZ-3	LAUSD shall prepare a Rail Safety Study (RSS) for the construction of any new classrooms or outdoor play areas that would be located within 1,500 feet of an existing rail line. For construction on existing campuses, if a proposed scope of work has the potential to exacerbate a safety hazard, a RSS will be triggered. **Rail Safety Study Protocol** This document provides a guidance protocol for conducting a 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.
SC-HAZ-4	The Construction Contractor shall comply with the following OEHS Site Assessment practices and requirements (as applicable): • District Specification Section 01 4524, Environmental Import / Export Materials Testing. • Removal Action Workplan or Remedial Activities Workplan. • South Coast Air Quality Management District Rule 1466. • District Specification Section 02 8400, Polychlorinated Biphenyl (PCB) Remediation. • Lead and asbestos abatement requirements identified by the Facilities Environmental Technical Unit (FETU) in the Phase I / Phase II, or abatement plan(s).
SC-AQ-1	Implementation of SC-AQ-1.

The Project site is an existing middle school. A Phase I ESA Report was prepared for the Project site in 2022 that found onsite listings consistent and typical of a school (see Appendix A). According to the Phase I ESA, Irving MS was listed in the following environmental databases: California Environmental Reporting System (CERS) Hazwaste, Hazmat, HAZNET, USEPA's FIFRA/TSCA Tracking System (FTTS), RCRA-LQR, Facility Index System (FINDS), and Enforcement and Compliance History Online (ECHO). The Phase I ESA Report, California Department of Toxic Substances Control (DTSC) EnviroStor database, and California State Water Resources Control Board GeoTracker database show that the proposed Project site is not listed as a hazardous waste site.[90,91] No violations were noted, and no additional offsite listings were considered an environmental concern to the Project site. The Environmental Data Resources, Inc. (EDR) environmental database search report also noted several off-site properties of potential concern based on the Project site's location within an older, densely developed urban environment. However, based on case status, distance and direction from the site, and hydraulic location with respect to groundwater flow direction, these listings were not considered an environmental concern to the site. The Los Angeles County Department of Public Health,

[90] California Department of Toxic Substances Control (DTSC). N.d. EnviroStor: 3010 Estara Ave, Los Angeles, CA 90065. Available at: https://www.envirostor.dtsc.ca.gov/public/map/?myaddress=3010+Estara+Ave+Los+Angeles. Accessed 10 August 2023.

[91] California State Water Resources Control Board. N.d. GeoTracker: 3010 Estara Ave, Los Angeles, CA 90065. Available at: https://geotracker.waterboards.ca.gov/map/?CMD=runreport&myaddress=3010+Estara+Ave+Los+Angeles. Accessed 10 August 2023.

Los Angeles Regional Water Quality Control Board (LARWQCB), Los Angeles County Fire Department (LACFD), and DTSC reported that they had no files pertaining to the site address. No records indicating the presence of any environmental conditions were provided by SCAQMD.

The 2022 Phase I ESA (Appendix A) revealed no evidence of recognized environmental conditions (RECs), controlled environmental conditions (CRECs), or historical recognized environmental conditions (HRECs), or *de minimis* conditions at the Project site. The report did acknowledge three LAUSD required scope items:

- Asbestos-containing building materials were identified onsite. It is probable lead-based paint and PCBs in the building materials also exist onsite due to the age of the onsite buildings.
- There is a potential for elevated concentrations of arsenic from historical application of herbicides and elevated concentrations of organochlorine pesticides from historical application of termiticides to be present in shallow soil at the site.
- There is indoor radon potential at the Project site; however, since the Phase I ESA was prepared, the site's designation has changed from a "high radon zone" to a "moderate radon zone". The site is located within a "moderate radon zone" as defined by the California Department of Conservation/California Geological Survey radon map.[92]

Based on the age of the Project site buildings, exterior soils may be impacted with lead due to the weathering of lead-based paint and with arsenic and/or organochlorine pesticides as a result of possible pesticide applications at the property. In addition to surficial applications, organochlorine pesticides may be found at depth as a result of treatment or injection beneath buildings as a termiticide.

The LAUSD OEHS conducted a Preliminary Environmental Assessment (PEA) in 2023 including detailed soil investigations to further understand potential contaminants onsite (Appendix F, *Preliminary Environmental Assessment Equivalent Document*). The survey was completed in May and June of 2023 per OEHS guidelines. The following conclusions were made in the PEA-E report:

- A former oil heating Underground Storge Tank (UST) and hydrocarbon impacted soil adjacent to the UST were identified to be present north of the Administration building.
- Arsenic-impacted soil was identified in five locations in the shallow soil within the site.
- Asbestos impacted soil was identified in two locations in the shallow soil within the site.
- All other remaining chemicals of concern, including those listed in the SCAQMD Rule 1466, such as lead, cadmium, nickel, mercury, polyaromatic hydrocarbons (PAHs), polychlorinated biphenyl (PCBs) and others were reported below their respective screening level or the 95% Upper Confidence Limit (95% UCL).

[92] California Department of Conservation. Indoor Radon Potential Map. State of California 2016. Accessed October 30, 2023. https://maps.conservation.ca.gov/cgs/radon

4. Environmental Checklist and Analysis

Upon review of the City of Los Angeles 2018 Local Hazard Mitigation Plan, the proposed Project would have no impact to the local hazard mitigation plan outlined in the report..[93] The Project site is an active middle school campus with an existing Safe School Plan that follows the LAUSD Integrated Safe School Plan.[94] While schools are required to comply with California Education Code 32280-9, the Safe School Plan 2023-2024 for Irving MS was not accessible for review as it is in the process of being updated. It is anticipated to be available on October 2, 2023.

The Project site is not located within 500 feet of existing high voltage lines or cell towers.[95] Overhead electrical distribution lines (66 kilovolt) operated by Southern California Edison are located approximately 20 feet north of the Project site, along Fletcher Drive.[96] The Antelope Valley line and Ventura County Metro Link lines are located approximately 1,800 feet west of the Project site. According to SoCalGas's gas Transmission Pipeline Interactive Map, SoCalGas owned or operated transmission lines are located immediately west of the Project site, along W San Fernando Road.[97] According to the urban/wildland interface fire maps within the City of Los Angeles 2018 Local Hazard Mitigation Plan, the Project site is not located within a wildfire hazard zone; however, it does border an area of very high wildfire severity zone dure to its proximity to the vegetated areas within the Silverlake neighborhood and Griffith Park.[98]

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

Potentially Significant Impact. The proposed Project would have the potential to result in significant impacts in regard to the routine transport, use, or disposal of hazardous materials during construction activities due to the presence of arsenic and asbestos in shallow soil onsite and the presence of an UST.

According to the Phase I ESA EDR report, Irving MS was listed in the following environmental databases: CERS Hazwaste, Hazmat, HAZNET, FTTS, RCRA-LQR, FINDS, and ECHO. Violations regarding failures to maintain Hazardous Waste Manifests, active generator permit, and improper labeling were reported in 2015, 2016, 2018, and 2019. The site is listed in the HAZNET database for the tracking of generated hazardous waste including asbestos-containing waste from 1990 to 2019; and laboratory waste, paint sludge, and organics from 1997 to 2014. All listings relate to tracking; and therefore, none of these listings represent an obvious environmental concern. In addition, no additional off-site listings were considered an environmental concern

[93] City of Los Angeles 2018 Local Hazard Mitigation Plan. January 2018. Tetra Tech. https://emergency.lacity.gov/sites/g/files/wph1791/files/2021-10/2018_LA_HMP_Final_with_maps_2018-02-09.pdf
[94] LAUSD. 2001. Integrated Safe School Plan 2021-2022 Highlights. Available at https://ca01000043.schoolwires.net/cms/lib/CA01000043/Centricity/Domain/318/New%20ISSP%20Components%202021-22%20final.pdf (accessed August 10, 2023).
[95] City of Los Angeles. February 3, 2016. Cellular Towers. Available at: https://geohub.lacity.org/datasets/f2e52f0183794e0089dbb3105f151202_24/explore?location=34.096798%2C-118.202092%2C13.00 Accessed 10 August 2023.
[96] California Energy Commission. August 9, 2023. California Electric Transmission Lines. https://cecgis-caenergy.opendata.arcgis.com/datasets/CAEnergy::california-electric-transmission-lines/explore?location=34.119556%2C-118.237456%2C16.58 Accessed 10 August 2023.
[97] Southern California Gas Company, a subsidiary of Sempra Energy. N.d. Natural Gas Pipeline Map. Available at: https://socalgas.maps.arcgis.com/apps/webappviewer/index.html?id=c85ced1227af4c8aae9b19d677969335 Main website: https://www.socalgas.com/stay-safe/pipeline-and-storage-safety/natural-gas-pipeline-map Accessed 10 August 2023.
[98] City of Los Angeles 2018 Local Hazard Mitigation Plan. Section 13-9, Figure 13-2, Wildfire Severity Zones in the Central APC January 2018. Tetra Tech. https://emergency.lacity.gov/sites/g/files/wph1791/files/2021-10/2018_LA_HMP_Final_with_maps_2018-02-09.pdf

(see Appendix A). However, in the subsequent PEA-E (Appendix F), it was determined that there is a potential for elevated concentrations of arsenic from historical application of herbicides and elevated concentrations of organochlorine pesticides (OCPs) from historical application of termiticides to be present in shallow soil at the site. Additionally, a previously unidentified UST was identified to the north of the Administrative Building.

Construction of the proposed Project would involve some transport and disposal of hazardous materials. As outlined above, both arsenic and asbestos-impacted soil were found onsite to a depth of 0.5 feet. Additionally, a previously unidentified UST was identified to the north of the Administrative Building. As such, there is the potential for hazardous materials to result in significant impacts with regard to the routine transport, use, or disposal of hazardous materials during construction activities, which requires the consideration of mitigation measures and alternatives in the EIR.

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

Potentially Significant Impact. The proposed Project would result in potentially significant impacts in regard to reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. According to the Phase I ESA EDR report, Irving MS was listed in the following environmental databases: CERS Hazwaste, Hazmat, HAZNET, FTTS, RCRA-LQR, FINDS, and ECHO. Violations regarding failures to maintain Hazardous Waste Manifests, active generator permit, and improper labeling were reported in 2015, 2016, 2018, and 2019. The site is listed in the HAZNET database for the tracking of generated hazardous waste including asbestos-containing waste from 1990 to 2019; and laboratory waste, paint sludge, and organics from 1997 to 2014. All listings relate to tracking; and therefore, none of these listings represent an obvious environmental concern. In addition, no additional off-site listings were considered an environmental concern (see Appendix A). However, in the subsequent PEA-E (Appendix F), it was determined that there is a potential for elevated concentrations of arsenic from historical application of herbicides and elevated concentrations of organochlorine pesticides (OCPs) from historical application of termiticides to be present in shallow soil at the site. As outlined above, both arsenic and asbestos-impacted soil were found onsite to a depth of 0.5 feet. Additionally, a previously unidentified UST was identified to the north of the Administrative Building. As such, there is the potential for hazardous materials to result in significant impacts through reasonably foreseeable upset and/or accident conditions involving the release of hazardous materials into the environment. The potential for significant impact requires the consideration of mitigation measures and alternatives in the EIR.

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

Potentially Significant Impact. The proposed Project would result in potentially significant impacts in regard to the emission of hazards or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. During the construction phase, it is possible children could come in contact with PCBs, asbestos, paints, or petroleum products (see Appendix A and Appendix F). However, SC-HAZ-04 would ensure that the following guidelines are followed: District Specification Section 01 4524, Environmental Import / Export Materials Testing; Removal Action Workplan; California Air Resources Board Rule 1466 Guidelines and Procedures to Address PCBs in Building Materials, particularly applicable to buildings that were constructed or remodeled between 1959 and 1979; lead and asbestos

abatement requirements identified by the FETU in the Phase I/Phase II; or abatement plan(s). It should be noted that the school is located within a moderate radon zone;[99] the 2022 Phase I ESA states that the school is located within a high radon zone. The high radon zone is defined as having a high potential for radon levels to be above 4 picocuries per liter (pCi/L). As stated in the Los Angeles Unified School District Reference Guide REF-5314.2, Procedures for Environmental Review of Proposed Projects: "building design and construction Measures – Should a building or similar structure be constructed or renovated for student and/or staff occupancy and is located in a "high" radon zone, U.S. EPA guidance entitled "radon Prevention in the Design and Construction of Schools and Other Large Buildings, EPA/625/R-92/016, June 1994" (or latest published version) shall be reviewed and all relevant and appropriate measures incorporated in its design and construction to prevent radon gas infiltration (see the LAUSD Radon Memorandum in Appendix A). As such, there is the potential for hazardous materials to result in significant impacts with regard to emit or release potentially hazardous materials that could impact students at Irving MS during construction activities, which requires the consideration of mitigation measures and alternatives in the EIR.

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

Potentially Significant Impact. The proposed Project would result in potentially significance impacts in regard to creating a significant hazard to the public or the environment due to location on a listed hazardous materials site. There is potential for elevated concentrations of arsenic from historical application of herbicides, organochlorine pesticides, or termiticides. If found, these would be present in shallow soil at the site. This site is also located within a "moderate radon zone."[100]

A PEA-E was conducted to address data gaps from the Phase I ESA investigation (see Appendix F). The PEA-E was conducted on May 20–21, June 23, and July 21, 2023. Soil samples were collected from 0.5, 2.5 and five (5) feet bgs and were screened for chemicals of potential concern including lead, arsenic, OCPs, PCBs, TPH, PAHs, and asbestos (Chrysotile). The PEA-E identified elevated levels of lead in ten (10) locations during initial screening and elevated levels of arsenic in eight (8) locations during initial screening. Asbestos was detected in two (2) locations. In addition to soil sampling, a geophysical investigation was conducted on the parking lot area adjacent to the Administration Building due to the suspected presence of an underground tank. Spectrum Geophysics investigated an area that was 35 feet by 100 feet in size. Two significant anomalies were detected during this investigation, both were typical of those associated with a steel UST. It was determined that a UST and concrete containment layer were present, and sampling results confirmed the presence of gasoline, diesel, and oil range hydrocarbons with the highest concentration coming from diesel -range hydrocarbons at 3,400 mg/kg at approximately 13 feet 8 inches bgs. It was anticipated that there was piping associated with the UST, but the exact location was not identified. These findings represent a potentially significant impact which requires the consideration of mitigation measures and alternatives in the EIR.

[99] California Department of Conservation. Indoor Radon Potential Map. State of California 2016. Accessed October 30, 2023. https://maps.conservation.ca.gov/cgs/radon

[100] California Department of Conservation. Indoor Radon Potential Map. State of California 2016. Accessed October 30, 2023. https://maps.conservation.ca.gov/cgs/radon

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

No Impact. The proposed Project would not be located within an airport land use plan or, where such a plan has not been adopted, within two nautical miles of a public airport or public use airport, resulting in a safety hazard for people residing or working in the Project area. The nearest public airport to the proposed Project is the Hollywood Burbank Airport (BUR), located approximately 9 miles northwest of the proposed Project site. Therefore, there would be no impact. No further analysis is warranted.

f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Less than Significant Impact. The proposed Project would result in less than significant impacts in regard to impairing implementation of or physically interfering with an adopted emergency response plan or emergency evacuation plan. The SUP does not allow any uses or design features that would impair implementation of or interfere with an adopted emergency response plan or emergency evacuation plan. The Project site is an active middle school campus with an existing Safe School Plan that is currently being updated (updates will be available in October 2023). The proposed Project would have no impact in relation to the City of Los Angeles 2018 Local Hazard Mitigation Plan. During construction, a Construction Worksite Traffic Control Plan would be required (SC-T-4) to maintain applicable transportation related safety measures as required by local and state agencies (see *Transportation* section, below). During operation, the proposed Project would shift peak traffic during student drop-off from E 45th Street at Compton Avenue on the east side of the Project site to Ascot Avenue on the west side of the Project site as an indirect effect of relocating the main Administration Building towards the western side of the elementary school campus. The shift in peak traffic would reduce potential conflicts with evacuation routes that are currently located east of the Project site. Therefore, the proposed Project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. No further analysis is warranted.

g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?

No Impact. The proposed Project would not expose people or structures to a risk of loss, injury, or death involving wildland fires. According to the urban/wildland interface fire maps within the City of Los Angeles 2018 Local Hazard Mitigation Plan, the Project site is not located within a wildfire hazard zone or urban fire and secondary hazard zone. Furthermore, the Project site is located in a heavily urbanized area away from dense vegetation. Moreover, the local fire code and Title 5 require the proposed Project to comply with these regulations. It should be noted that the proposed Project is located approximately one mile to the northeast of a severe fire hazard area, however, is separated from this region by the Los Angeles River. Therefore, the proposed Project would not expose people or structures to a risk of loss, injury, or death involving wildland fires. Therefore, there would be no impact. No further analysis is warranted.

4. Environmental Checklist and Analysis

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
X. HYDROLOGY AND WATER QUALITY. Would the project:				
a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?	☐	☐	☒	☐
b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	☐	☒
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
i) Result in substantial on- or offsite erosion or siltation;	☐	☐	☐	☒
ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;	☐	☐	☒	☐
iii) 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; or	☐	☐	☐	☒
iv) Impede or redirect flood flows?	☐	☐	☐	☒
d. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☐	☒
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?	☐	☐	☐	☒

Explanation:

LAUSD has SCs for minimizing impacts to hydrology and water quality. Applicable SCs related to hydrology and water quality impacts associated with the proposed Project are provided below:

LAUSD Standard Conditions of Approval	
SC-HWQ-1	LAUSD shall design and construct the project to meet or exceed the current and applicable stormwater guidelines. **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). These guidelines meet current post-construction Standard Urban Stormwater Mitigation Plan (SUSMP) and the mandated post-construction element of the NPDES program requirements
SC-HWQ-2	LAUSD shall implement the applicable stormwater requirements during construction activities.

	Compliance Checklist for Storm Water Requirements at Construction Sites This checklist has requirements for compliance with the General Construction Activity Permit and is used by OEHS to evaluate permit compliance. Requirements listed include a SWPPP; BMPs for minimizing storm water pollution to be specified in a SWPPP; and monitoring storm water discharges to ensure that sedimentation of downstream waters remains within regulatory limits.
SC-HWQ-3	LAUSD shall implement the following programs and procedures, as applicable: • Environmental Training Curriculum – a qualified environmental Monitor shall provide a worker's environmental awareness program that is prepared by LAUSD for the project. • Hazardous Waste Management Program (Environmental Compliance/Hazardous Waste). • Medical Waste Management Program. • Environmental Compliance Inspections. • Safe School Inspection Program. • Integrated Pest Management Program. • Fats Oil and Grease Management Program. • Solid Waste Management Program. • Other related programs overseen by OEHS.
SC-HWQ-5	LAUSD shall evaluate tsunami hazards to determine if the project site is within a tsunami inundation zone as delineated by California Emergency Management Agency or National Oceanic and Atmospheric Administration. If the project site is within a tsunami hazard zone LAUSD shall prepare a Tsunami Awareness and Evacuation Plan in compliance with the LAUSD Emergency Operations Plan.
SC-HWQ-6	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.

The proposed Project site is a 11.2-acre existing public-school campus, not including City streets. Of this area, 80 percent is impermeable surfaces such as asphalt parking lots, play areas, buildings, and the synthetic turf field, which is installed over an asphalt play yard. Greenspace encompasses only 20 percent, or about 2.24 acres of the Campus. The school's highest point is in the middle, and it slopes down in all directions at a rate of approximately 1 percent. There are two main city storm drain lines that are currently serving the school. One is a 33-inch line located in fletcher drive, and the second is a 12-inch line located in the middle of the school within the City of Los Angeles Easement. Both lines are ultimately connected to the County of Los Angeles Storm Drain System and to a City of Los Angeles storm drain line in Marguerite Street. According to the Los Angeles Department of Public Works, the site is not built on top of a groundwater well.[101] The Project site does not contain any natural drainages or water courses, which would potentially support riparian habitat, or natural undeveloped areas that may contain any other sensitive natural community. According to the Phase I

[101] L. (n.d.). Los Angeles Ground Water Wells. Retrieved August 11, 2023, from http://dpw.lacounty.gov/general/wells/

ESA (Appendix A), EnSafe submitted a request to the LARWQCB and found that there were no pending violations. The proposed Project site is not in a 100-year flood plain area.[102] The proposed location is not at risk for inundation by seiche, tsunami, or mudflow. The nearest surface water body is the Los Angeles River, located approximately 1.0 mile northeast of the proposed Project site.[103] According to the 2018 Los Angeles Hazards Mitigation Plan, the proposed Project site is located in an area will low susceptibility to landslides.[104] The Project is located approximately 12.8 miles northeast of the tsunami zone mapped along the west coast of the City of Los Angeles.[105] According to the City of Los Angeles General Plan, the Project site is not located in an area at risk for mudflows.

a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?

Less than Significant Impact. During site reconnaissance, it was determined that the site is not located on, near, or around significant surface water resources. The nearest surface water is the Los Angeles River, approximately 1.0 mile to the southwest. A geotechnical survey completed in 2022 also determined that there were pockets of perched groundwater at approximately 17 to 20 feet below the surface. Additionally, as the current Project site has very low drainage capabilities it does not provide significant infiltration into the groundwater. The percentage of the site that would be pervious upon completion of the modernization Project is anticipated to stay the same or increase post development. Therefore, there would be a less than significant impact to surface or groundwater quality.

Construction Phase

Construction of the proposed Project would be regulated by the statewide construction general permit (CGP) as well as the LAUSD stormwater technical manual (SC-HWQ-1) and the LAUSD compliance checklist for Stormwater requirements at Construction sites (SC-HWQ-2). These regulations require that the site maintains all construction debris within a frequently inspected perimeter control and that all open spaces and slopes are either actively undergoing construction or stabilized via erosion control BMPs. The stormwater requirements of both the statewide CGP and the LAUSD compliance checklist require that the site inspecting for spills, non-stormwater discharges, non-visible pollutants, sedimentation, or other potential hazards to surface and groundwater quality on a weekly basis for the extent of construction. Along with the SWPPP, the checklist requires that BMPs be implemented to ensure sedimentation and downstream waters remain within regulatory limits. As a result, no impact to surface water or groundwater quality is anticipated.

Furthermore, hazardous materials that may be exposed to stormwater shall be removed within a timely manner pursuant to SWPPP requirements to ensure minimal potential exposure to stormwater or sheet flow as a result of rain events.

[102] FEMA's National Flood Hazard Layer (NFHL) viewer. Accessed August 11, 2023. https://hazards-fema.maps.arcgis.com/apps/webappviewer/index.html?id=8b0adb51996444d4879338b5529aa9cd
[103] United States Environmental Protection Agency Waters GeoViewer. Accessed August 11, 2023 https://epa.maps.arcgis.com/apps/webappviewer/index.html?id=074cfede236341b6a1e03779c2bd0692
[104] 2018 Los Angeles Hazard Mitigation Plan. January 2018. Accessed August 11, 2023 https://emergency.lacity.gov/sites/g/files/wph1791/files/2021-10/2018_LA_HMP_Final_with_maps_2018-02-09.pdf
[105] L. (n.d.). Tsunami Inundation Zones. Retrieved August 11, 2023, from http://geohub.lacity.org/datasets/ffaf33ba67264818a729dc97a384c064_6

Operation Phase

Implementation of the proposed Project would not violate any water quality standards and waste discharge requirements. During site reconnaissance, it was determined that the site is not located on, near, or around significant surface water resources. The nearest surface water is the Los Angeles River, approximately 1.0 mile to the southwest. A geotechnical survey completed in 2022 also determined that there were pockets of perched groundwater at approximately 17 to 20 feet below the surface. Additionally, the current Project site has very low drainage capabilities and, therefore, does not provide significant infiltration into the groundwater. The percentage of the site that would be pervious upon completion of the modernization Project is anticipated to stay the same or increase post development. Therefore, there would be a less than significant impact to surface or groundwater quality.

b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

No Impact. Implementation of the proposed Project would not deplete groundwater supplies or interfere with groundwater recharge such that the Project may impede sustainable groundwater management of the basin. During the construction phase of the Project, the pervious area of the Project would temporarily increase, which would result in an increase of groundwater supplies. The final proposed site plans and landscape features have similar percentages of greenspace and planting areas as the existing conditions, and therefore no net change in impervious surfaces is anticipated. The proposed Project may ultimately increase the area of pervious surfaces as outlined in the Site Analysis & Program Development Report, Figures 5.3.1 through 5.3.4, landscape features that show habitat gardens and ecology gardens where there had previously been parking lots or classrooms.[106] The proposed Project is located on stiff to hard clay soils, and infiltration rates are expected to be below 0.1 minutes/inch. As a result, the Project site likely does not currently contribute significantly to groundwater recharge. The Project site does not use groundwater; nor is it built on an existing groundwater well.[107] The Project site is currently served by the Los Angeles Department of Water and would continue to be for the duration of the Project, so the proposed Project would not deplete groundwater levels or interfere with normal groundwater recharge rates. Furthermore, the proposed Project would reduce the number of standard classrooms from 65 to 46, and there is a possibility water use would decrease. Landscaped areas require slightly more infiltrating soils than those which are currently on the site. In the case additional water resources are used for landscaping, these resources would return to the groundwater via infiltration. Therefore, there would be no impacts related to depletion of groundwater supplies or interference with groundwater recharge such that the Project may impede sustainable groundwater management of the basin. No further analysis is warranted.

[106] Los Angeles Unified School District. 2023. Irving STEAM Magnet Middle School, Site Analysis & Program Development Report. Prepared by NAC Architecture.
[107] Los Angeles Ground Water Wells. Retrieved August 11, 2023, from http://dpw.lacounty.gov/general/wells/

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c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:

i) Result in substantial on- or offsite erosion or siltation;

No Impact. The proposed Project would not substantially alter the existing drainage pattern of the site or area. The existing hydrology of the site was analyzed using the topographic data provided by the district and public information from the Los Angeles County Hydrology Manual. The topography shows a hill site that drains to all sides. According to the USGS 7.5-minute quadrangle map, the NWI, and a site reconnaissance, there are no streams or rivers located at or within close proximity to the proposed Project site. The nearest waterbody is the Los Angeles River, approximately 1 mile to the southwest of the site. The Los Angeles River is concrete lined in this area and designed to capture stormwater runoff of the surrounding urban areas[108,109] and therefore would not be altered as a result of the proposed Project. LAUSD shall comply with applicable regulations (SC-HWQ-1) and the Standard Urban Storm Water Mitigation Plan (SUSMP) BMPs to the extent feasible[110] and therefore the proposed Project would not result in any significant erosion or siltation on-or off-site upon Project completion. During construction, the Project would control erosion and siltation with the implementation of a site specific SWPPP and an Erosion And Sediment Control Plan that is part of the SWPPP. Additionally, regulations as part of SC-HWQ-02 would require the construction manager to implement BMPs in order to minimize erosion, sedimentation, and siltation. Therefore, the proposed Project would not result in substantial erosion or siltation on-or off-site. No further analysis is warranted.

ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;

Less than Significant Impact. The proposed Project would not substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or off-site. Currently, the site is sloped downwards on all sides from the campus core and has an elevation that ranges from approximately 390 to 416 feet above mean sea level. It is generally organized in three plateaus with the Administration, Classroom, and Auditorium Buildings on the highest, the athletic fields and parking lots on the next highest, and the Physical Education Building and soccer field on the lowest. The existing drainage patterns are outlined in detail in Figure 2.3.12 of the Site Analysis & Program Development Report, with surficial water draining towards existing storm drain infrastructure on the surrounding streets.[111] The proposed Project would not increase impermeability at the site, and it would comply with City and County ordinances regulating drainage improvements. Finally, it will comply with the LAUSD stormwater technical manual (SC-HWQ-1) which integrates requirements from the SUSMP. Compliance with the preceding ordinances will ensure that the proposed Project would not adversely affect the local drainage system in a manner that would result in substantial flooding on- or off-site. It should

[108] United States Environmental Protection Agency Waters GeoViewer. Accessed August 11, 2023 https://epa.maps.arcgis.com/apps/webappviewer/index.html?id=074cfede236341b6a1e03779c2bd0692
[109] Los Angeles Public Works, Los Angeles County Storm Drain System. Accessed August 11, 2023. https://pw.lacounty.gov/fcd/StormDrain/index.cfm
[110] Standard Urban Storm Water Mitigation Plan for Los Angeles County and Cities in Los Angeles County. March 8, 2000. Los Angeles Regional Water Quality Control Board. https://www.waterboards.ca.gov/losangeles/water_issues/programs/stormwater/susmp/susmp_rbfinal.pdf
[111] Los Angeles Unified School District. 2023. Irving STEAM Magnet Middle School, Site Analysis & Program Development Report. Prepared by NAC Architecture.

be noted that during site assessment of drainage and storm drain capacity, City storm drains associated with drainage of subarea two (the athletic field and parking areas) and subarea four (classroom and Administration buildings) currently exceed the storm drain capacity in the case of a 10-year storm event. This condition would not change as a result of the proposed Project, and although impervious areas would remain roughly the same, it is likely that improvements across the site would increase infiltration through additional landscaping, and therefore potentially reduce flows into the city storm drain system. Therefore, the proposed Project would not 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 that would result in flooding on- or off-site.

iii) 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; or

No Impact. The proposed Project would not 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. Impervious surfaces such as buildings and parking lots can increase runoff rates through impeding infiltration of rainfall and increasing overland flow velocities. The proposed Project would have a similar ratio of pervious versus impervious areas to the existing condition. The proposed Project would not have more runoff than the existing conditions, and therefore would not exceed the capacity of the existing stormwater drainage systems. The proposed redevelopment would consider drainage patterns and volume in their design, as required by the LA Public Works SUSMP and the LAUSD stormwater technical manual (SC-HWQ-1). The proposed Project is anticipated to have more landscaping than what is currently present on the site. During the construction phase of the Project, the amount of pervious area would temporarily increase, which would then decrease the amount of runoff. Furthermore, the proposed Project would not generate substantial additional sources of polluted runoff. Stormwater quality would also be addressed through regulatory permit requirements and BMPs. Therefore, there would be no impact. No further analysis is warranted.

iv) Impede or redirect flood flows?

No Impact. The proposed Project would not impede or redirect flood flows. The proposed Project site is not located in a 100-year flood hazard area.[112] The nearest surface water body is the Los Angeles River, located approximately 1.0 mile southwest of the proposed Project site, which serves as a flood control channel with sufficient capacity to prevent flooding in the surrounding area.[113] Therefore, the proposed Project would not impede or redirect flood flows. No further analysis is warranted.

d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?

No Impact. The proposed Project site is not at risk of releasing pollutants due to Project inundation via flood, tsunami, or seiche. The nearest surface water body is the Los Angeles River, located approximately 1.0 mile southwest of the proposed Project site. According to the 2018 Los Angeles Hazards Mitigation Plan, the

[112] FEMA's National Flood Hazard Layer (NFHL) viewer. Accessed August 11, 2023. https://hazards-fema.maps.arcgis.com/apps/webappviewer/index.html?id=8b0adb51996444d4879338b5529aa9cd

[113] United States Environmental Protection Agency Waters GeoViewer. Accessed August 11, 2023 https://epa.maps.arcgis.com/apps/webappviewer/index.html?id=074cfede236341b6a1e03779c2bd0692

proposed Project site is located in an area with low susceptibility to landslides.[114] The Project is located 12.8 miles to the east of the tsunami zone mapped along the west coast of the City.[115] According to the City General Plan, the Project site is not located in an area that is at risk for mudflows. Therefore, the proposed Project site is not at risk of releasing pollutants due to Project inundation via flood, tsunami or seiche. No further analysis is warranted.

e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

No Impact. The proposed Project would not conflict with or obstruct implementation of any water quality control plans or any sustainable groundwater management plans. The proposed Project would not significantly alter the ratios of impermeable areas to permeable areas. The proposed Project shall be designed in accordance with the LA County Basin Plan, the LA Public Works SUSMP, and the LA Basin Sustainable Groundwater Management Plan. Construction activities shall comply with the requirements of a SWPPP. Therefore, the proposed Project site is not at risk of conflicting with or obstructing implementation of any water quality control plans or any sustainable groundwater management plans. No further analysis is warranted.

[114] 2018 Los Angeles Hazard Mitigation Plan. January 2018. Accessed August 11, 2023 https://emergency.lacity.gov/sites/g/files/wph1791/files/2021-10/2018_LA_HMP_Final_with_maps_2018-02-09.pdf
[115] Tsunami Inundation Zones. Retrieved August 11, 2023, from http://geohub.lacity.org/datasets/ffaf33ba67264818a729dc97a384c064_6

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XI. LAND USE AND PLANNING. Would the project:				
a. Physically divide an established community?	☐	☐	☐	☒
b. Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☐	☒

Explanation:

a) Physically divide an established community?

No Impact. The proposed Project would result in no impacts in relation to physically dividing an established community. The proposed Project site is located at Irving MS, which is currently in operation as a school and has been open since 1937.[116] The proposed Project site consists of 16 parcels in the Northeast Los Angeles Community Plan Area, bound by Fletcher Drive to the northwest, Estara Avenue to the northeast, Marguerite Street to the southeast, and Avenue 32 to the southwest. Additionally, Moss Avenue and Roswell Street are vacated City-owned streets that bisect the Campus and connect Fletcher Drive to Estara Avenue. The District has obtained a revocable permit to occupy the City right-of-way that runs through this portion of the Campus; however, the proposed Project would not make any improvements to the City right-of-way. All improvements would be constructed on District property at Irving MS, and the proposed Project would not result in any new physical barriers that would divide the surrounding residential community or the broader Northeast Los Angeles community. The proposed Project would not restrict access to Moss Avenue or Roswell Street, and their entrances to the Campus would remain. The Project would not restrict access to any surrounding streets. The purpose of the proposed Project is to complete a major modernization of an existing school campus to provide facilities that are safe, secure, and aligned with the instructional program. There would be no change to the current land use at the site. Neighborhood schools are generally essential parts of the surrounding communities and, therefore, do not create physical barriers. No further analysis is warranted.

b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

No Impact. The proposed Project would result in no impacts in relation to conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. The Northeast Los Angeles Community Plan establishes neighborhood-specific goals and implementation strategies to achieve the broad objectives laid out in the City's General Plan, and it serves as the Land Use Element for the Northeast Los Angeles Community Plan Area. The proposed Project site is designated by the Northeast Los Angeles Community Plan as "Junior High School – Public" with a "Public Facilities" land use designation (see Figure

[116] California Department of Education. August 17, 2023. "California School Directory - Washington Irving Middle School Math, Music and Engineering Magnet." https://www.cde.ca.gov/schooldirectory/details?cdscode=19647336058077

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7),[117] and it is zoned "Public Facilities" (PF) (see Figure 8). Both the Northeast Los Angeles Community Plan and the City zoning code permit public secondary schools in the Public Facilities designations.[118,119] Therefore, the proposed Project does not conflict with the applicable land use plans and regulations. Furthermore, there would be no conflict with zoning designations because, as allowed per Government Code Section 53094, in 2019 the LAUSD Board of Education adopted a resolution to exempt all LAUSD school sites from local land use regulations.

Additionally, the proposed Project would not conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. On the contrary, a core objective of the proposed major modernization Project is to provide structurally safe buildings in order to meet AB 300 criteria for seismic evaluation; therefore, the proposed Project would be undertaken to ensure compliance with a policy that has been adopted to mitigate existing seismic risks.

The proposed Project would modernize the existing Campus to improve safety for the Project's existing use as a school. There would be no conflict with the existing or surrounding land uses. Therefore, there would be no impact. No further analysis is warranted.

[117] City of Los Angeles. June 25, 2014. "General Plan Land Use Map – Northeast Los Angeles Community Plan." https://planning.lacity.org/plans-policies/community-plan-area/north-los-angeles
[118] City of Los Angeles. Amended September 7, 2016. "Northeast Los Angeles Community Plan." https://planning.lacity.org/plans-policies/community-plan-area/north-los-angeles
[119] City of Los Angeles. Municipal Code, Chapter 1, Section 12.04.09 "PF" Public Facilities Zone. "https://codelibrary.amlegal.com/codes/los_angeles/latest/lapz/0-0-0-1548 (accessed April 23, 2023)

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

Explanation:

a) Result in the loss of availability of a known mineral resource that would be a value to the region and the residents of the state?

No Impact. The proposed Project would result in no impacts in relation to the loss of availability of a known mineral resource that would be of value to the region and the residents of the state. The proposed Project site is located at Irving MS, which is currently in operation as a school and has been open since 1937.[120] The proposed Project site is designated by the Northeast Los Angeles Community Plan as "Junior High School – Public" with a "Public Facilities" land use designation (see Figure 7).[121] It is zoned PF (see Figure 8), which is primarily intended for government uses, public libraries, schools, post offices, public health facilities, farming and nurseries, public parking, and fire and police stations.[122] Based on review of the most recent California Geological Survey mineral land classification map, the proposed Project site is located in Mineral Resource Zone 3 (MRZ-3).[123] MRZ-3s contain concrete aggregate of undetermined mineral resource significance, which does not constitute a known mineral resource of value to the region. Further, given that the proposed Project site is currently occupied and not zoned or designated for mineral resources, the site is unavailable for extraction, and City does not intend to use it for such. The proposed Project, which involves modifications to the existing school, would not preclude mineral extraction to a greater extent than that which already exists. Therefore, there would be no impact. No further analysis is warranted.

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?

No Impact. The proposed Project would result in no impacts in relation to the loss of availability of a locally important mineral resource recovery site. The proposed Project site contains no mineral resource extraction operations; the proposed Project site is located at Irving MS, which currently operates as a school and has been

[120] California Department of Education. August 17, 2023. "California School Directory - Washington Irving Middle School Math, Music and Engineering Magnet." https://www.cde.ca.gov/schooldirectory/details?cdscode=19647336058077
[121] City of Los Angeles. June 25, 2014. "General Plan Land Use Map – Northeast Los Angeles Community Plan." https://planning.lacity.org/plans-policies/community-plan-area/north-los-angeles
[122] City of Los Angeles. Municipal Code, Chapter 1, Section 12.04.09 "PF" Public Facilities Zone. "https://codelibrary.amlegal.com/codes/los_angeles/latest/lapz/0-0-0-1548 (accessed April 23, 2023)
[123] California Geological Survey. 2021. "Updated Mineral Resource Zones for Portland Cement Concrete Aggregate in the San Fernando Valley and Saugus-Newhall Production-Consumption Regions." https://maps.conservation.ca.gov/cgs/informationwarehouse/index.html?map=mlc

open since 1937.[124] The proposed Project site is located in the Northeast Los Angeles Community Plan Area of the City of Los Angeles. The Northeast Los Angeles Community Plan does not delineate any locally important mineral resource recovery site,[125] and the Conservation Element of the City General Plan states that "the only available [mineral] deposit site in the city is the Tujunga alluvial fan."[126] Based on review of the California Division of Mine Reclamation database, the nearest mine is the Peck Road Gravel Pit in the City of Irwindale, located approximately 13.5 miles east.[127] As there are no locally important mineral resource recovery sites at the proposed Project site, there would be no impact. No further analysis is warranted.

[124] California Department of Education. August 17, 2023. "California School Directory - Washington Irving Middle School Math, Music and Engineering Magnet." Available at https://www.cde.ca.gov/schooldirectory/details?cdscode=19647336058077
[125] City of Los Angeles. Amended September 7, 2016. "Northeast Los Angeles Community Plan." https://planning.lacity.org/plans-policies/community-plan-area/north-los-angeles
[126] City of Los Angeles. September 2001. "Conservation Element." https://planning.lacity.org/plans-policies/general-plan-overview
[127] California Department of Conservation, Division of Mine Reclamation. "Mines Online." https://maps.conservation.ca.gov/mol/index.html (accessed August 23, 2023)

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XIII. NOISE. Would the project result in:				
a. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or in other applicable local, state, or federal standards?	☒	☐	☐	☐
b. Generation of excessive groundborne vibration or groundborne noise levels?	☒	☐	☐	☐
c. For a project located within the vicinity of a private airstrip or 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?	☐	☐	☐	☒

Explanation:

LAUSD has SCs for minimizing noise and vibration impacts; applicable SCs related to noise and vibration impacts associated with the proposed Project are provided below:

LAUSD Standard Conditions of Approval	
SC-N-1	LAUSD shall design new buildings and other noise-generating sources to include features such as sound walls, building configuration, and other design features that attenuate exterior noise levels on a school campus to less than 67 dBA L_{eq}.[128]
SC-N-2	LAUSD shall analyze the acoustical environment of the site (such as traffic) and the characteristics of planned building components (such as Heating, Ventilation, and Air Conditioning [HVAC]), and designs shall achieve interior classroom noise levels of less than 45 dBA L_{eq} with a target of 40 dBA L_{eq} (unoccupied), and a reverberation time 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. • New construction should achieve classroom acoustical quality consistent with the current School Design Guide and CHPS (California High Performance Schools) standard of 45 dBA L_{eq}. • New HVAC installations should be designed to achieve the lowest possible noise level consistent with the current School Design Guide. HVAC systems shall be designed so that noise from the system does not cause the ambient noise in a classroom to exceed the current School Design Guide and CHPS standard of 45 dBA L_{eq} • Modernization of existing facilities and/or HVAC replacement projects should improve the sound performance of the HVAC system over the existing system. • The District's purchase of new units should give preference to HVAC manufacturers that sell the lowest noise level units at the lowest cost. • Existing HVAC units operating in excess of 45 dBA Leq inside classrooms should be modified

[128] L10 value represents the noise level that is exceeded 10% of the time or 6 minutes in an hour.

SC-N-3	LAUSD shall incorporate long-term permanent noise attenuation measures between new playgrounds, stadiums, and other noise-generating facilities and adjacent 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; and/or Other site-specific project design features
SC-N-4	LAUSD or its Construction Contractor shall consult and coordinate with the school principal or site administrator, and other nearby noise sensitive land uses prior to construction to schedule high noise or vibration producing activities to minimize disruption. Coordination between the school, nearby land uses and the Construction Contractor shall continue on an as-needed basis throughout the construction phase of the project to reduce school and other noise sensitive land use disruptions.
SC-N-5	LAUSD shall require the Construction Contractor to minimize blasting for all demolition and construction activities, where feasible
SC-N-6	For projects where pile driving activities are required within 150 feet of a structure, a detailed vibration assessment shall be provided by an acoustical engineer to analyze potential impacts related to vibration to nearby structures and to determine feasible mitigation measures to eliminate potential risk of architectural damage.
SC-N-7	LAUSD shall meet with the Construction Contractor to discuss alternative methods of demolition and construction for activities within 25 feet of a historic building to reduce vibration impacts. During the preconstruction meeting, the Construction Contractor shall identify demolition methods not involving vibration-intensive construction equipment or activities. For example: sawing into sections that can be loaded onto trucks results in lower vibration levels than demolition by hydraulic hammers. • Prior to construction activities, the Construction Contractor shall inspect and report on the current foundation and structural condition of the historic building. • The Construction Contractor shall implement alternative methods identified in the preconstruction meeting during demolition, excavation, and construction, such as mechanical methods using hydraulic crushers or deconstruction techniques. • The Construction Contractor shall avoid use of vibratory rollers and packers adjacent to the building. • During demolition, the Construction Contractor shall not phase any ground-impacting operations near the building to occur at the same time as any ground impacting operation associated with demolition and construction. During demolition and construction, if any vibration levels cause cosmetic or structural damage to the building or structure, a “stop-work” order shall be issued to the Construction Contractor immediately to prevent further damage. Work shall not restart until the building is stabilized and/or preventive measures to relieve further damage to the building are implemented.
SC-N-8	Projects within 500 feet of a non-LAUSD sensitive receptor, such as a residence, shall be reviewed by OEHS to determine what, if any, feasible project specific noise reduction measures are needed. The Construction Contractor shall implement project specific noise reduction measures identified by OEHS. Noise reduction measures may include, but are not limited to, the following:

	Source Controls • Time Constraints – prohibiting work during sensitive nighttime hours. • Scheduling – performing noisy work during less sensitive time periods (on operating campus: delay the loudest noise generation until class instruction at the nearest classrooms has ended; residential: only between 7:00 AM and 7:00 PM). • Equipment Restrictions – restricting the type of equipment used. • Substitute Methods – using quieter methods and/or equipment. • Exhaust Mufflers – ensuring equipment has quality mufflers installed. • Lubrication & Maintenance – well maintained equipment is quieter. • Reduced Power Operation – use only necessary size and power. • Limit Equipment On-Site – only have necessary equipment on-site. • Noise Compliance Monitoring – technician on site to ensure compliance. • Quieter Backup Alarms – manually-adjustable or ambient sensitive types. Path Controls • Noise Barriers – semi-permanent or portable wooden or concrete barriers. • Noise Curtains – flexible intervening curtain systems hung from supports. • Enclosures – encasing localized and stationary noise sources. • Increased Distance – perform noisy activities farther away from receptors, including operation of portable equipment, storage and maintenance of equipment. Receptor Controls • Window Treatments – reinforcing the building's noise reduction ability. • Community Participation – open dialog to involve affected residents. • Noise Complaint Process – ability to log and respond to noise complaints. Advance notice of the start of construction shall be delivered to all noise sensitive receptors adjacent to the project area. The notice shall state specifically where and when construction activities will occur, and provide contact information for filing noise complaints with the Construction Contractor and the District. In the event of noise complaints noise shall be monitored from the construction activity to ensure that construction noise is not obtrusive.
SC-N-9	Construction Contractor shall ensure that LAUSD interior classroom noise and exterior noise standards are met to the maximum extent feasible, or that construction noise is not disruptive to the school environment, through implementation of noise control measures, as necessary.[129] Noise control measures may include, but are not limited to: Path Controls • Noise Attenuation Barriers[130] – Temporary noise attenuation barriers installed blocking the line of sight between the noise source and the receiver. Intervening barriers already present, such as berms or buildings, may provide sufficient noise attenuation, eliminating the need for installing noise attenuation barriers.

[129] The need for noise control measures depends on the type and quantity of equipment being used, the work being performed, and the proximity of the construction activity to active exterior use areas (e.g., playgrounds, athletic fields, etc.) or classrooms. For example, the need for noise control measures may be required if a major construction project (e.g. demolition of a building and/or construction of a new building) takes place on an active LAUSD campus.

[130] While the height and Sound Transmission Class (STC) rating of the Noise Attenuation Barrier needed will depend on the Project specific conditions, an example of the specifications for a Noise Attenuation Barrier would be: Noise Attenuation Barriers shall be a minimum height of 12 feet and have a minimum Sound Transmission Class rating of 25 (STC-25).

	Source Controls • 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 areas: only between 7:00 AM and 7:00 PM). • Substitute Methods – using quieter methods and/or equipment. • Exhaust Mufflers – ensuring equipment has quality mufflers installed. • Lubrication & Maintenance – well maintained equipment is quieter. • Reduced Power Operation – use only necessary size and power. • Limit Equipment On-Site – only have necessary equipment on-site. • Quieter Backup Alarms – manually-adjustable or ambient sensitive types. If OEHS determines that the above noise reduction measures will not reduce construction noise to below the levels permitted by LAUSD's noise standards LAUSD shall mandate that construction bid contracts include the following receptor controls: Receptor Controls • Temporary Window Treatments – temporarily reinforcing the building's noise reduction ability. Temporary Relocation – in extreme otherwise unmitigable cases, students shall be moved to temporary classrooms / facilities away from the construction activity.

a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or in other applicable local, state, or federal standards?

Potentially Significant Impact. Construction and operational activities associated with the Project have the potential to create noise impacts that may adversely affect surrounding residential and commercial uses. Noise levels from mobile and stationary sources may increase where construction of new buildings and other facilities are proposed. Therefore, relevant noise standards and temporary and periodic noise levels associated with Project construction will be further evaluated within the Draft EIR.

b) Generation of excessive groundborne vibration or groundborne noise levels?

Potentially Significant Impact. Groundborne vibration and groundborne noise could occur during the construction phase of the proposed Project. Therefore, relevant vibration standards and temporary and vibration levels which could occur during construction and operation of the Project will be further evaluated within the Draft EIR.

c) For a project located within the vicinity of a private airstrip or 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 proposed Project would result in no impacts to noise in relation to being located within a private airstrip or airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport. The Hollywood Burbank Airport is located 8.5 miles northwest of the proposed Project site. The proposed Project would not result in population growth and would not generate trips, causing an increase in excessive noise levels. There would be workers present during construction and maintenance

activities, but those activities would be temporary and intermittent in nature. The proposed Project would not result in any impacts related to an airport.

4. Environmental Checklist and Analysis

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XIV. PEDESTRIAN SAFETY. Would the project:				
a. Substantially increase vehicular and/or pedestrian safety hazards due to a design feature or incompatible uses?	☒	☐	☐	☐
b. Create unsafe routes to schools for students walking from local neighborhoods?	☒	☐	☐	☐
c. Be located on a site that is adjacent to or near a major arterial roadway or freeway that may pose a safety hazard?	☒	☐	☐	☐

Explanation:

LAUSD has SCs for approval for minimizing impacts to pedestrian safety. Applicable SCs related to pedestrian safety impacts associated with the proposed Project are provided below:

LAUSD Standard Conditions of Approval	
SC-PED-1	LAUSD shall participate in the Safe Routes to School (SR2S) program. **Caltrans SR2S program.** LAUSD is a participant in the SR2S program administered by Caltrans, local law enforcement, and transportation agencies. OEHS provides pedestrian safety evaluations as a component of traffic studies conducted for new school projects. This pedestrian safety evaluation includes a determination of whether adequate walkways and sidewalks are provided along the perimeter of, across from, and adjacent to a proposed school site and along the paths of identified pedestrian routes within a 0.25-mile radius of a proposed school site. The purpose of this review is to ensure that pedestrians are adequately separated from vehicular traffic.
SC-PED-2	LAUSD shall implement the applicable requirements and recommendations associated with the OEHS Traffic and Pedestrian Safety Program. **OEHS Traffic and Pedestrian Safety Program** 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. School traffic/circulation studies shall identify measures to ensure separation between pedestrians and vehicles along potential pedestrian routes, such as sidewalks, crosswalks, bike paths, crossing guards, pedestrian and traffic signals, stop signs, warning signs, and other pedestrian access measures.
SC-PED-3	LAUSD shall implement the applicable sidewalk requirements outlined in the School Design Guide. LAUSD shall also coordinate with the responsible traffic jurisdiction/agency to implement infrastructure improvements prior to the opening of a school. Improvements shall include, but are not limited to: • Clearly designate passenger loading areas with the use of signage, painted curbs, etc. • Install new walkway and/or sidewalk segments where none exist. • Substandard walkway/sidewalk segments shall be improved to a minimum of eight feet wide.

	Provide other alternative measures that separate foot traffic from vehicular traffic, such as distinct travel pathways or barricades.
SC-PED-4	LAUSD shall design the project to comply with the traffic and pedestrian guidelines in the School Traffic Safety Reference Guide. **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. This guide sets forth requirements for traffic and pedestrian safety, and procedures for school principals to request assistance from OEHS, the Los Angeles Schools Police Department (LASPD), or the local police department regarding traffic and pedestrian safety. Distribution and posting of the Back to School Safety Tips flyer is required. This guide also includes procedures for traffic surveys, parking restrictions, crosswalks, advance warning signs (school zone), school parking signage, traffic controls, crossing guards, or for determinations on whether vehicle enforcement is required to ensure the safety of students and staff.
SC-PED-5	LAUSD shall design new student drop-off, pick-up, bus loading areas, and parking areas to comply with the School Design Guide. **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.
SC-T-3	Implementation of SC-T-3.
SC-T-4	Implementation of SC-T-4.

The Project site is bound by Flecher Drive to the northwest, West Avenue 32 to the southwest, Estara Avenue to the northeast, and Marguerite Street to the southeast. The Project site also contains two vacated City of Los Angeles streets, Moss Avenue and Roswell Street, that allow access to a parking lot on site. Moss Avenue, a closed street that enters from Fletcher Drive, is a major trafficked thoroughfare. Roswell Street enters from Estara Avenue on the northeast side of campus. There are four crosswalks that provide access to the Campus:

1. Intersection of Fletcher Drive and Estara Avenue (towards the northernmost point of the site)
2. Intersection of Estara Avenue and Marguerite Street (towards the easternmost point of the site)
3. Intersection of West Avenue 32 and Fletcher Drive (towards the westernmost point of the site)
4. Intersection of Marguerite Street and West Avenue 32 (towards the southernmost point of the site)

The driveway accesses on Estara Avenue and Fletcher Drive exceed maximum width of a City of Los Angeles driveway, as they used to be alleys before being vacated by the City of Los Angeles. The access point at Estara Avenue (Roswell Street) does not provide pedestrian access. The campus is enclosed by a chain-link fence, with gated vehicular access at four locations:

1. Vehicular/Maintenance access at Estara Avenue (Accessible through Roswell Street)

2. Vehicular/Maintenance access at Fletcher Drive (Accessible through Moss Avenue)
3. Two Vehicular/Maintenance access points on West Avenue 32 (one further north, near the bungalows, and one further south near the basketball courts)

Pedestrian access is controlled at gates at seven locations:

1. Magnet Gate located on W Avenue 32 (near the southwestern portion of the school, just north of the soccer field)
2. Octavia Gate on Marguerite Street (towards the southeastern end of campus to the northeast of the Racquetball enclosure)
3. Pedestrian Gate on the northeastern slope of Marguerite Street (to the northeast of the Homemaking Building).
4. Main Gate on Estara Avenue (located northwest of the eastern most corner on campus, to the northwest of the Auditorium)
5. Pedestrian Gate on Estara Avenue (immediately southeast to driveway access to Roswell Street)
6. Fletcher Gate on Fletcher Drive (near western corner on campus, beside access to Moss Avenue)
7. Octavia Gate 3 on Fletcher Drive (furthest gate west on campus, to the southwest of Fletcher Gate)

The Main Pedestrian Gate on Estara Avenue functions as a Check-in Gate, where a guard checks in students and visitors. Evaluation on other driveways and sidewalks was not sufficiently provided by the survey. The Administration Building on the Campus can be most easily accessed from the Main Pedestrian Gate.

There are five pick-up/drop-off zones located on Campus, and one Special Education (SPED) bus pick-up/drop-off site on the Roswell Street parking lot. The Campus site is bisected by two main walking paths. The first main pedestrian walking path runs east-west across campus and connects an entrance on Marguerite Avenue to Moss Avenue. Both ends of this walking path serve as drop-off points for pedestrians. The second main walking path starts at the Main Pedestrian Gate entrance on Estara Avenue and runs southwest to the Physical Education Building. There is a Magnet and Lacer program pick-up/drop-off zone located on W Avenue 32, a Charter School pick-up/drop-off zone located on Marguerite Street with an entrance at Octavia Gate, an Irving MS pick-up/drop-off zone at the Pedestrian Gate on Marguerite Street, a Charter School pick-up/drop-off zone off Fletcher Drive, and an Irving MS pick-up/drop-off zone at the Main Gate entrance.

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

Potentially Significant Impact. The proposed Project would result in potentially significant impacts in relation to vehicular and/or pedestrian safety hazards. LAUSD SCs require that performance guidelines to minimize potential pedestrian safety risks to students, faculty and staff, and visitors at LAUSD schools are taken into consideration in the design of sidewalks, new student drop-off, pick-up, bus loading areas, and

parking areas.[131] The Project is a modernization of the school to alleviate structural and seismic risks on the campus from an earthquake fault under the campus. The Project site would still function as a school, and the school would remain operational throughout construction activity. This Project plans to decrease the classroom count by 29 percent (or 19 classrooms), for a total of 46 classrooms, and construction may impact parking areas, vehicular access, student pick-up/drop-off zones, and pedestrian routes. The proposed Project would not interfere with public right-of-way, except for construction vehicle entry and exiting from the site and traffic from construction activities. The Project would be bounded within the proposed site, and there are no plans for a design feature that would increase vehicular and/or pedestrian safety. However, a *Traffic and Pedestrian Safety Technical Study* is being prepared that will identify the potential for impacts as well as whether any streets on or adjacent to the campus need to be repaved and restriped as part of the Project, meaning for a brief time during construction phasing, their use would be impacted. Additionally, the proposed Project would also improve portions of parking lots and playgrounds located on the Project site. Any areas located directly above the fault would be turned into outdoor areas, such as hardscape, landscape, or parking. The proposed Project would also provide for ADA upgrades at locations impacted by the Project scope. The proposed Project would result in less than significant impacts to vehicular/and or pedestrian safety in relation to design features or incompatible use during operation. However, due to traffic consideration from construction activities, the potential for impacts will be analyzed further in the Draft EIR following the Linscott, Law & Greenspan, Engineers (LLG) *Traffic and Pedestrian Safety Technical Study* that is being prepared for this Project.

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

Potentially Significant Impact. The proposed Project would result in potentially significant impacts in relation to unsafe routes for students walking from local neighborhoods. The public sidewalk along the school's west side on W Avenue 32 is 4 feet wide and currently does not meet the City of Los Angeles standard for a minimum width of 5 feet. Additionally, there are sidewalk tripping hazards near the northwest driveway on W Avenue 32 (Vehicular Access 4). There is also evidence of erosion along the western and southern areas of the site that affect the sidewalk. Furthermore, Vehicular Access 1 on Estara Avenue does not provide an ADA-accessible path for pedestrians along the public sidewalk. If improvements are needed at Vehicular Access 1, the access point might be reconstructed with an ADA-accessible sidewalk entry or curb ramps per city standard. However, as the proposed Project plan does not extend beyond the fenced area of the school campus into the public right-of-way, there is no current plan to alter sidewalks, crosswalks, and roadways in the surrounding neighborhood. Construction would feature the upgrade of parking lots and playgrounds and change areas above the earthquake fault into outdoor areas, such as landscapes, hardscapes, and parking. Construction phasing may also require repaving and restriping of streets on or adjacent to the campus, which could impact pedestrian access to the school. Potential risks to safety for students walking to the campus associated with public sidewalks mentioned above will be evaluated in the LLG *Traffic and Pedestrian Safety Technical Study*. The proposed Project will require construction vehicles to enter and exit the campus, so traffic control measures need to be evaluated for traffic and pedestrian safety. The proposed Project would not create unsafe routes for students walking from local neighborhoods during operation, but as there is potential for Project-related pedestrian safety impacts during construction, vehicular/and or pedestrian safety will be analyzed further in the in the LLG *Traffic and Pedestrian Safety Technical Study* carried into the Draft EIR.

[131] Los Angeles Unified School District. 2015. School Upgrade Program Final Environmental Impact Report, http://achieve.lausd.net/ceqa. Adopted by the Board of Education on November 10, 2015.

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

Potentially Significant Impact. The proposed Project would result in potentially significant impacts in relation to the position of the site near to or adjacent to a major arterial roadway or freeway that may pose a safety hazard. The nearest major arterial roadway is Fletcher Drive, designated as arterial roadway type Avenue II by the City Mobility Plan.[132] Fletcher Drive receives significant traffic and is described as a major thoroughfare for area traffic.[133] The nearest freeway, State Route (SR)-2, is located just past Maguerite Street. While located near the Project site, freeway SR-2 is elevated and does not provide vehicular access to the site until San Fernando Road approximately 0.2 mile southwest of the Project site. The site has been in operation adjacent to the arterial roadway, Fletcher Drive, and would continue to maintain operation through construction. Construction or alterations to existing pedestrian or vehicular access may result in a potential safety hazard from Fletcher Drive and will be evaluated in the LLG *Traffic and Pedestrian Safety Technical Study*. As there is potential for Project-related impacts, vehicular/and or pedestrian safety will be analyzed further by LLG and carried into the Draft EIR.

[132] Los Angeles City Planning. Northeast Los Angeles Community Plan 2023. Circulation Map. https://planning.lacity.org/odocument/4e41c97d-be85-4e7c-8787-6f4b5abb7c2d/gencircmap.nla.pdf
[133] Irving Steam Magnet Middle School. Site Analysis & Program Development Report. 2023.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XV. POPULATION AND HOUSING. Would the project:				
a. Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☐	☒
b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

Explanation:

LAUSD has SCs for minimizing impacts to population and housing. Applicable SCs related to population and housing impacts associated with the proposed Project are provided below:

LAUSD Standard Conditions of Approval	
SC-PH-1	**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).

a) Induce substantial unplanned 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)?

No Impact. The proposed Project would result in no impact to population and housing in relation to inducing substantial direct or indirect population growth. The proposed Project would replace some buildings and remove others located on the earthquake fault on the campus. The Project would decrease the classroom count by 32 percent (or 21 classrooms), which would not be expected to induce population growth. No new houses would be built; no new businesses would be introduced; and because the Project site is located in an urban context, there is no need to extend infrastructure into any areas not currently served via roads and utilities as a result of the proposed Project. Although construction of the Project could cause fluctuations with enrollment, the overall number of classrooms would decrease, so the Project is not likely to result in an increase in population as a result of the proposed construction activities or operations. The proposed Project would reduce the number of classrooms from 65 to 46 on campus. Therefore, an increase in staff requirements is not anticipated. There are sufficient available labor supplies within 30 miles of the Project site to support design, construction, operation, and maintenance of the Project.[134] The Project site is located in the center of a dense urban area in the City of Los Angeles with a high population and readily available workforce, and labor needs would be met through the available labor in Los Angeles County. The labor force as of June 2023 for Los

[134] State of California, Employment Development Department. March 2022. Monthly Labor Force Data for Cities and Census Designated Places (CDP). https://labormarketinfo.edd.ca.gov/geography/losangeles-county.html (accessed August 7, 2023).

Angeles County is 5,024,300 with an unemployment rate of 5.3 percent.[135] June 2023 construction industry data in the Los Angeles-Long Beach-Glendale Metropolitan District starts at 1,595,100 employed, up from 1,573,100 at the beginning of 2022.[136] Therefore, there is sufficient labor supply within the county to support construction, operation, and maintenance of the Project. Local contractors and employees would be available and would not require labor forces to move to or near the Project area as a direct result of the proposed Project. Therefore, there would be no impacts to population and housing related to inducing substantial direct or indirect population growth, and no further analysis is warranted.

b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

No Impact. The proposed Project would result in no impact to population and housing in relation to the displacement of substantial amounts of existing people or housing, necessitating the construction of replacement housing elsewhere. The proposed Project is a modernization Project of an existing school campus. There is no existing housing, or any proposed housing for construction, within the proposed Project site.[137] The proposed Project is not anticipated to increase property values such that residents would no longer be able to afford staying in their homes. The proposed Project would not require any eminent domain or evictions to make way for new development, and no indirect displacement is anticipated from the Project. Therefore, there would be no impacts to population and housing related to the displacement of substantial amounts of existing people or housing, and no further analysis is warranted.

135 State of California, Employment Development Department. July 21, 2023. Unemployment Rates and Labor Force. Labor Market Information for Los Angeles-Long Beach-Glendale Metropolitan District (Los Angeles County). https://labormarketinfo.edd.ca.gov/geography/losangeles-county.html (accessed August 7, 2023).

136 State of California, Employment Development Department. 2019. Occupational Employment and Wage Statistics (OEWS) Employment and Wage Statistics: Los Angeles-Long Beach-Glendale Metropolitan District. Labor Market Information Resources and Data. https://labormarketinfo.edd.ca.gov/data/employment-projections.html#Long (accessed August 7, 2023).

137 City of Los Angeles. 2021. City of Los Angeles General Plan. 2021-2029 Housing Element. https://planning.lacity.org/odocument/6fbfbbd0-a273-4bad-a3ad-9a75878c8ce3/Chapter_6_-_Housing_Goals,_Objectives,_Policies,_and_Programs_(Adopted).pdf (accessed August 7, 2023).

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XVI. PUBLIC SERVICES. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:				
a. Fire protection?	☐	☐	☐	☒
b. Police protection?	☐	☐	☐	☒
c. Schools?	☐	☐	☐	☒
d. Parks?	☐	☐	☐	☒
e. Other public facilities?	☐	☐	☐	☒

Explanation:

LAUSD has SCs for minimizing impacts to public services. Applicable SCs related to public services impacts associated with the proposed Project are provided below:

LAUSD Standard Conditions of Approval	
SC-PS-1	If necessary, LAUSD shall: 1. Have local fire and police jurisdictions review all construction and site plans prior to the State Fire Marshall's final approval. 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.

a) Fire protection?

No Impact. The proposed Project would result in no impact in relation to substantial adverse physical impacts associated with new or physically altered fire protection facilities in order to maintain acceptable service ratios, response times, or other performance objectives. Based on review of the Safety Element of the City of Los Angeles General Plan, fire protection in the City is provided by the LAFD.[138] The Project site is a middle school campus that is currently served by LAFD Station 50.[139] Secondary fire protection services could be provided by one of three fire stations: Fire Station 22 (located approximately 1.5 miles from the proposed Project site at 1201 S Glendale Ave, Glendale, CA 91205), Fire Station 55 (located approximately 1.6 miles from the proposed Project site at 4455 York Blvd, Los Angeles, CA 90041), and Fire Station 56 (located approximately 1.6 miles from the proposed Project site at 2759 Rowena Ave, Los Angeles, CA 90039).

138 City of Los Angeles. November 2021. City of Los Angeles General Plan. Safety Element. https://planning.lacity.org/odocument/bf51ae04-1c7b-4931-9a29-d46209998b89/Safety_Element.pdf

139 City of Los Angeles Department of City Planning. n.d. ZIMAS. Address: 3010 E Estara Ave. Available at: http://zimas.lacity.org/ (accessed August 9, 2023).

The LAFD is comprised of career firefighters and reserve staff to support large-scale incidents, and it has access to a well-developed network of water systems to adequately respond to large-scale fires that may occur within the City. The City has over 100 fire stations, and Downtown Los Angeles is covered by the Central Bureau, which manages the operations of 22 fire stations. Station 50 is located approximately 545 feet or a 1-minute drive southwest of the Project site and would provide fire protection services in case of emergency (**Table 7: City Fire Stations**).

Table 7
City Fire Stations

Station	Location	Distance to Site / Drive Time
No. 50	3036 Fletcher Drive Los Angeles, CA 90065	545 ft / 1 minute
Source: City of Los Angeles. 2023. City of Los Angeles Fire Department. https://www.lafd.org/fire-stations/station-results		

Construction of the proposed Project would not result in the need for new or physically altered fire protection facilities, as construction activities would occur temporarily over a period of 21 months, during which there would not be an increased need for fire protection services. Construction work would occur within the buildings undergoing renovations, and staging areas would be situated within disturbed vacant lots. Fire protection access would not be hindered during construction. Operation of the proposed Project would not directly or indirectly induce population growth because it does not include the development of new homes, habitable structures, businesses, roads, or infrastructure. As there would be no net increase in population, there would be no need for additional firefighting personnel or new or expanded fire stations as a result of the proposed Project. The proposed Project site would continue to be served by LAFD due to its location in the City.

Therefore, there would be no impacts in relation to substantial adverse physical impacts associated with new or physically altered fire protection facilities in order to maintain acceptable service ratios, response times, or other performance objectives. No further analysis is warranted.

b) Police protection?

Level of Impact. The proposed Project would result in no impacts in relation to substantial adverse physical impacts associated with new or physically altered police protection facilities in order to maintain acceptable service ratios, response times, or other performance objectives. The Project site is a middle school campus that is currently served by the City of Los Angeles Police Department (LAPD) Northeast Community Station.[140] The LAUSD also maintains its own police department to provide security for LAUSD schools and centers within its jurisdiction.[141] The Los Angeles School Police Department (LASPD) would provide the primary law enforcement for the proposed Project. LAPD would be the secondary provider for police protection services

[140] City of Los Angeles Department of City Planning. n.d. ZIMAS. Address: 31010 E Estara Ave. Available at: http://zimas.lacity.org/ (accessed August 9, 2023).
[141] LAUSD, OEHS. New School Construction Program, Final Program Environmental Impact Report (PEIR) (incorporates the New School Construction Program, Draft PEIR), Published May 2004. Board Certified June 8, 2004, Draft PEIR p. 3.15-10.

within the Project site. The LAPD currently has 11,942 sworn officers, which represents a service population ratio of 3.41 officers per 1,000 population.

Based on review of the Safety Element of the City General Plan and the LAPD website, the Northeast Community Police Department station is located at 3353 San Fernando Road, Los Angeles, CA 90065, approximately 0.3 mile or a 2-minute drive northwest of the Project site.[142,143]

The proposed Project includes construction of multiple buildings at Irving MS. Construction of the proposed Project would not result in the need for new or physically altered police protection facilities, as construction activities would occur temporarily over a period of approximately 42 months, during which there would not be an increased need for police protection services. Operation of the proposed Project would not directly or indirectly induce population growth because it does not include the development of new homes, habitable structures, businesses, roads, or infrastructure. As there would be no net increase in population, there would be no need for additional police personnel or new or expanded police stations as a result of the proposed Project. The proposed Project site would continue to be served by the LAPD due to its location in the City.

Therefore, there would be no impacts in relation to substantial adverse physical impacts associated with new or physically altered police protection facilities in order to maintain acceptable service ratios, response times, or other performance objectives. No further analysis is warranted.

c) Schools?

No Impact. The proposed Project would result in no impacts in relation to substantial adverse physical impacts associated with new or physically altered school facilities in order to maintain acceptable service ratios, response times, or other performance objectives. Irving MS is a part of the Glassell Park/Los Feliz Community of Schools. The nearest schools to Irving MS are Fletcher Drive Elementary School (approximately 0.1 mile northeast), ISANA Octavia Academy (approximately 0.1 mile south), and Alliance Leichtman-Levine FFES High School (approximately 0.25 miles southwest) (**Figure 13: Schools**).[144]

The proposed Project includes demolition and rebuilding of existing buildings and modernization of others. As stated in Section 3.2, *Proposed Project*, of the Project Description, the current 65 standard classrooms would be reduced to 46 standard classrooms. The proposed Project would not directly or indirectly induce population growth because it does not include the development of new homes, habitable structures, businesses, roads, or infrastructure. As there would be no increase in population and the Project is proposing improvements to an existing school facility, there would be no need for new or expanded school facilities as a result of the proposed Project.

[142] City of Los Angeles. November 2021. City of Los Angeles General Plan. Safety Element. https://planning.lacity.org/odocument/bf51ae04-1c7b-4931-9a29-d46209998b89/Safety_Element.pdf

[143] Los Angeles Police Foundation and the LAPD. 2023. Your LAPD by Division. https://www.lapdonline.org/lapd-contact/central-bureau/northeast-community-police-station/?zip=Washington%20Irving%20Mid%20School%20Math%20Music%20And%20Engr%20Magnet%2C%203010%20Estara%20Ave%20%20Los%20Angeles%2090065

[144] Los Angeles Police Foundation and the LAPD. 2023. Your LAPD by Division. https://www.lapdonline.org/lapd-contact/central-bureau/northeast-community-police-station/?zip=Washington%20Irving%20Mid%20School%20Math%20Music%20And%20Engr%20Magnet%2C%203010%20Estara%20Ave%20%20Los%20Angeles%2090065

Therefore, there would be no impacts in relation to substantial adverse physical impacts associated with new or physically altered school facilities in order to maintain acceptable service ratios, response times, or other performance objectives. No further analysis is warranted.

d) Parks?

No Impact. The proposed Project would result in no impact in relation to substantial adverse physical impacts associated with new or physically altered park facilities in order to maintain acceptable service ratios, response times, or other performance objectives.

The proposed Project includes demolition and rebuilding of existing buildings and modernization of others. The proposed Project would not directly or indirectly induce population growth because it does not include the development of new homes, habitable structures, businesses, roads, or infrastructure. As there would be no net increase in population, there would be no need for new or expanded park facilities as a result of the proposed Project.

Although the proposed Project would involve construction of replacement outdoor basketball courts and other school athletic facilities where new buildings cover the locations of existing facilities, these would not be new park facilities. The proposed Project would enhance the existing recreational facilities on the Campus. The recreational facilities on the Campus are available to the community for use pursuant to the Civic Center Act (CA Ed. Code Sections 38130 – 38139). Therefore, there would be no impacts in relation to substantial adverse physical impacts associated with new or physically altered park facilities in order to maintain acceptable service ratios or other performance objectives. No further analysis is warranted.

e) Other public facilities?

No Impact. The proposed Project would result in no impact in relation to substantial adverse physical impacts associated with new or physically altered public facilities in order to maintain acceptable service ratios, response times, or other performance objectives.

The proposed Project, which would be limited to the Campus property, would not require the construction of new maintenance roads as a result of the proposed Project, and the proposed Project does not involve the construction of public facilities (e.g., libraries, hiking trails). The proposed Project would not directly or indirectly induce population growth because it does not include the development of new homes, habitable structures, businesses, roads, or infrastructure. As there would be no net increase in population, there would be no need for new or expanded public facilities as a result of the proposed Project to serve a new population.

Therefore, there would be no impacts in relation to substantial adverse physical impacts associated with new or physically altered public facilities in order to maintain acceptable service ratios, response times, or other performance objectives. No further analysis is warranted.

FIGURE 13
Schools

4. Environmental Checklist and Analysis

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	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XVII. RECREATION. Would the project:				
a. Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☐	☒
b. Include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment?	☐	☐	☐	☒

Explanation:

a) 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?

No Impact. The proposed Project would result in no impact to recreation in relation to increased use of existing neighborhood and regional parks or other recreational facilities that would contribute to their physical deterioration.

Irving MS is located in City of Los Angeles – Northeast Los Angeles – North Study Area of the County's Park Needs Assessment. The neighborhood is served by both parks operated by the County of Los Angeles Department of Parks and Recreation and the City of Los Angeles Department of Recreation and Parks. According to the County of Los Angeles's 2022 *Los Angeles Countywide Comprehensive Park Needs Assessment Plus*, the North Study Area (#183) contains 3.3 park acres per 1,000 population to support a population of approximately 149,099, the same as the county average of 3.3 park acres per 1,000 population.[145] Approximately 50 percent of the population lives within a half mile of a park, only slightly above the county average of 49 percent regarding park accessibility. The Project site is located within a mile of a total of 85.61 acres of park and recreational open space available to the community (see **Table 8: Existing City Parks and Recreation Facilities near Project Site**; and **Figure 14: Parks and Open Space**).

[145] Los Angeles County Department of Parks and Recreation and Placeworks. May 2022. Los Angeles Countywide Comprehensive Parks & Recreation Needs Assessment. City of LA Northeast Los Angeles – North Study Area. Available at: https://lacountyparkneeds.org/wp-content/root/FinalReportAppendixA/StudyArea_183.pdf (accessed August 7, 2023).

Table 8
Existing City Parks and Recreation Facilities near Project Site

Park Name	Park Acreage	Distance from Project Site (miles)
Adams Square Mini-Park	0.30	1.0 north
Cerritos Park	0.89	0.8 northwest
Drew Street Park	0.12	0.2 north
Elysian Valley Gateway Park	0.32	1.7 southwest
Glassell Park and Recreation Center	12.66	0.3 east
Glenhurst Park	0.29	0.7 southwest
Juntos Park	1.64	0.2 northwest
Los Angeles River & Trail	5.43	0.7 southwest
Marsh Street Skate Park	0.29	0.6 southwest
Marsh Park	4.76	0.6 southwest
Natural Park	0.41	0.6 southwest
Palmer Park	3.33	1.0 northwest
Rio de Los Angeles State Park	54.77	0.4 southwest
Unnamed site – Mountains Recreation and Conservation Authority	0.40	0.6 southwest

Source:

Los Angeles County Department of Parks and Recreation and Placeworks. May 2022. Los Angeles Countywide Comprehensive Parks & Recreation Needs Assessment. City of LA Northeast Los Angeles – North Study Area. Available at: https://lacountyparkneeds.org/wp-content/root/FinalReportAppendixA/StudyArea_183.pdf (accessed August 7, 2023).

Los Angeles County Department of Parks and Recreation and Placeworks. May 2022. Los Angeles Countywide Comprehensive Parks & Recreation Needs Assessment. City of LA Silver Lake - Echo Park - Elysian Valley. Available at: https://lacountyparkneeds.org/wp-content/root/FinalReportAppendixA/StudyArea_138.pdf (accessed August 24, 2023).

Los Angeles County Department of Parks and Recreation and Placeworks. May 2022. Los Angeles Countywide Comprehensive Parks & Recreation Needs Assessment. City of Glendale - Southside. Available at: https://lacountyparkneeds.org/wp-content/root/FinalReportAppendixA/StudyArea_168.pdf (accessed August 24, 2023).

In addition, there are existing recreational facilities on the Project site that provide separate recreation opportunities for middle school students, such as basketball courts, a soccer field, and open lawn athletic field.

The proposed Project would not increase the use of existing neighborhood and regional parks or other recreational facilities that would cause or accelerate substantial deterioration of the facilities. The proposed Project would not induce population growth in the Project area, which would be the principal cause of such an impact. The proposed Project is not designed or expected to increase the current capacity of the Irving MS campus. Construction of the proposed Project would be phased to allow for operation of portions of the school campus during the construction phase. Recreation facilities required to support school programs would be provided on-site; therefore, there would be no long-term impact on existing recreation facilities and programs within the surrounding neighborhood as a result of the proposed Project. Pursuant to California Education Code Section 38131.b, also known as the Civic Center Act, school facilities would be available during off-school hours for permitted use by public organizations, which would add to the available recreation space in the community. While current recreation facilities would need to be replaced to accommodate the new buildings that would be located outside of the earthquake fault zone, with the construction of new shared-use recreation

facilities on-site, the Project is anticipated to result in beneficial effects for the community. Therefore, there would be no impact. No further analysis is warranted.

b) Include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment?

No Impact. The proposed Project would include recreational facilities for its students. The proposed improvements would not require construction or expansion of off-site facilities. As the proposed Project would not increase the capacity of the existing middle school, it would not burden any facility beyond capacity by generating additional recreational users. Since adequate recreational facilities would be provided on-site (Monday–Friday) and students would not be required to use off-site recreational facilities, there would be no impacts associated with the construction of recreational facilities. No further analysis is warranted.

4. Environmental Checklist and Analysis

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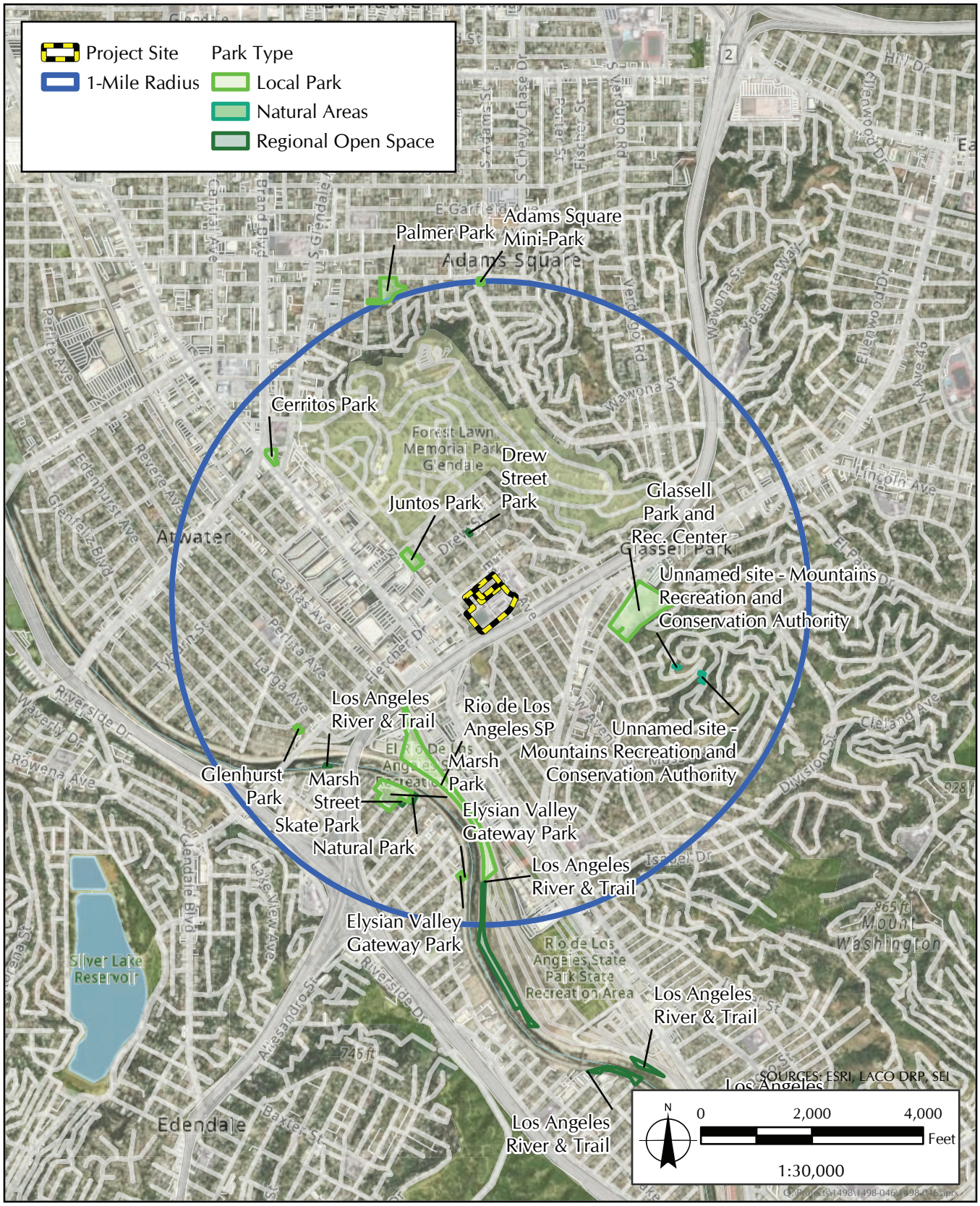

FIGURE 14

Parks and Open Space

4. Environmental Checklist and Analysis

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	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XVIII. TRANSPORTATION AND CIRCULATION. Would the project:				
a. Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?	☒	☐	☐	☐
b. Conflict or be inconsistent with CEQA Guidelines section 15064.3(b), which pertains to vehicle miles travelled?	☐	☐	☒	☐
c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☒	☐	☐	☐
d. Result in inadequate emergency access?	☒	☐	☐	☐

Explanation:

LAUSD has SCs for approval for minimizing impacts to pedestrian safety. Applicable SCs related to pedestrian safety impacts associated with the proposed Project are provided below:

LAUSD Standard Conditions of Approval	
SC-PED-1	LAUSD shall participate in the Safe Routes to School (SR2S) program. **Caltrans SR2S program.** LAUSD is a participant in the SR2S program administered by Caltrans, local law enforcement, and transportation agencies. OEHS provides pedestrian safety evaluations as a component of traffic studies conducted for new school projects. This pedestrian safety evaluation includes a determination of whether adequate walkways and sidewalks are provided along the perimeter of, across from, and adjacent to a proposed school site and along the paths of identified pedestrian routes within a 0.25-mile radius of a proposed school site. The purpose of this review is to ensure that pedestrians are adequately separated from vehicular traffic.
SC-PED-2	LAUSD shall implement the applicable requirements and recommendations associated with the OEHS Traffic and Pedestrian Safety Program. **OEHS Traffic and Pedestrian Safety Program** 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. School traffic/circulation studies shall identify measures to ensure separation between pedestrians and vehicles along potential pedestrian routes, such as sidewalks, crosswalks, bike paths, crossing guards, pedestrian and traffic signals, stop signs, warning signs, and other pedestrian access measures.
SC-PED-3	LAUSD shall implement the applicable sidewalk requirements outlined in the School Design Guide. LAUSD shall also coordinate with the responsible traffic jurisdiction/agency to implement infrastructure improvements prior to the opening of a school. Improvements shall include, but are not limited to: • Clearly designate passenger loading areas with the use of signage, painted curbs, etc. • Install new walkway and/or sidewalk segments where none exist.

	• Substandard walkway/sidewalk segments shall be improved to a minimum of eight feet wide. Provide other alternative measures that separate foot traffic from vehicular traffic, such as distinct travel pathways or barricades.
SC-PED-4	LAUSD shall design the project to comply with the traffic and pedestrian guidelines in the School Traffic Safety Reference Guide. **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. This guide sets forth requirements for traffic and pedestrian safety, and procedures for school principals to request assistance from OEHS, the Los Angeles Schools Police Department (LASPD), or the local police department regarding traffic and pedestrian safety. Distribution and posting of the Back to School Safety Tips flyer is required. This guide also includes procedures for traffic surveys, parking restrictions, crosswalks, advance warning signs (school zone), school parking signage, traffic controls, crossing guards, or for determinations on whether vehicle enforcement is required to ensure the safety of students and staff.
SC-PED-5	LAUSD shall design new student drop-off, pick-up, bus loading areas, and parking areas to comply with the School Design Guide. **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.
SC-T-3	Implementation of SC-T-3.
SC-T-4	Implementation of SC-T-4.

a) Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?

Potentially Significant Impact. The proposed Project would result in potentially significant impacts in relation to conflicts with a program, plan, ordinance, or policy addressing the circulation system. The proposed Project would result in temporary impacts to the circulation system during construction activities and slightly increase the potential of pedestrian safety risks. Projects that have the potential to change student capacity associated with classroom loading, reconfiguration of the school or construction of new classrooms, or the construction of other school facilities have the potential to generate traffic associated with the Project.[146] Construction would feature the upgrade of parking lots and playgrounds and change areas above the fault into outdoor areas, such as landscapes, hardscapes, and parking which could have an impact on access to the campus. The Project may also require repaving and restriping of Moss Avenue and Roswell Street during Project phasing which could impact on access to the school from these entry points. The proposed Project would also be required to include ADA compliant upgrades to features that are impacted by the Project scope. Interim Housing would be provided as mitigation to ensure the school remains fully operational through construction.

[146] Los Angeles Unified School District. 2015. School Upgrade Program Final Environmental Impact Report, http://achieve.lausd.net/ceqa. Adopted by the Board of Education on November 10, 2015

The Project therefore can shift traffic or change vehicle turning movements in key intersections during construction. As there is potential for Project-related impacts, transportation will be analyzed further in the *Traffic and Pedestrian Safety Technical Study* being prepared by LLG and carried into the EIR.

b) Conflict or be inconsistent with CEQA Guidelines section 15064.3(b), which pertains to vehicle miles travelled?

Less than Significant Impact. The proposed Project would result in less than significant impacts in relation to conflict or inconsistency with CEQA Guidelines section 15064.3(b).[147] This guideline indicates that vehicle miles that do not exceed a threshold of significance, such as when Projects are within one-half mile of a major transit stop, potentially cause less than significant impact. Under PRC Section 21064.3,[148] the mass transit stops in this case would be two bus stops: Fletcher / Avenue 32 (0.3 mile southwest)[149] and Fletcher/Estara (0.1 mile northwest).[150] The Project would decrease the number of classrooms from 65 to 46 classrooms, meaning that fewer students would be dropped off at the school, resulting in a decrease per capita of VMT. As it is expected that VMT will remain the same or decrease due to this decrease in student capacity, there would be no conflict with CEQA Guidelines section 15064.3(b). Therefore, impacts would be less than significant. No further analysis is warranted.

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

Potentially Significant Impact. The proposed Project would have the potential to result in significant impacts in relation to a substantial increase in hazards due to a geometric design feature or incompatible uses. The Project would be constructed within the gated campus and outside of the public right-of-way. The Project will alter school building features, but will not introduce any incompatible uses, sharp curves, or dangerous intersections. The Project would not change the use of the school, and the campus will continue to operate as a school. LAUSD will coordinate with LLG to prepare the *Traffic and Pedestrian Safety Technical Study* and has specifications for transportation as well as the school provision of adequate access, parking, and circulation in the vicinity of a school site.[151] The study will evaluate impacts caused by construction, such as changes in traffic patterns around the school. This includes the two former/abandoned city streets that intersect the campus, Moss Avenue and Roswell Street. These streets and the streets immediately around the campus may need to be

[147] Section 15064.3 - Determining the Significance of Transportation Impacts, Cal. Code Regs. tit. 14 § 15064.3.

[148] Public Resources Code. Division 13. Environmental Quality [21000-21189.91] Chapter 2.5 Definitions. 21064.3 "Major Transit Stop." Accessed August 8 2023. https://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?sectionNum=21064.3.&lawCode=PRC.

[149] Moveit. Directions from Fletcher/Ave 32 Station to Irving Steam Magnet Middle School. Accessed August 25 2023. https://moovitapp.com/los_angeles_ca-302/poi/3087%20West%20Avenue%2032/Irving%20Middle%20School%20%28Irving%20Steam%20Magnet%29/en?metroSeoName=Los_Angeles_CA&customerId=4908&ref=1&af_sub8=%2Findex%2Fen%2Fpublic_transit-Downtown_Los_Angeles-Los_Angeles_CA-site_25758890-302&af_sub9=Search%20bar%20button&fll=34.11756_-118.24152&poiType=egsite&ttl=34.116484_-118.243459

[150] Moveit. Directions from Fletcher/Estara Bus Station to Irving Steam Magnet Middle School. Accessed August 25 2023. https://moovitapp.com/los_angeles_ca-302/poi/Irving%20Middle%20School%20%28Irving%20Steam%20Magnet%29/Fletcher%20~2F%20Estara/en?metroSeoName=Los_Angeles_CA&customerId=4908&ref=1&af_sub8=%2Findex%2Fen%2Fpublic_transit-Fletcher_Estara-Los_Angeles_CA-stop_46202082-302&af_sub9=Search%20bar%20button&fll=34.11799_-118.24153&ttl=34.11756_-118.24152&poiType=stop&tsid=46202082,46202082.

[151] LAUSD OEHS CEQA Specification Manual. December 2005, revised June 2007. Appendix C, Traffic and Pedestrian Safety Requirements for New Schools.

repaved and restriped in coordination with LADOT during an appropriate phase of Project construction. Construction activities would also feature the upgrade of parking lots and playgrounds and change areas above the fault into outdoor areas, such as landscapes, hardscapes, and parking. While it is anticipated that the proposed Project would result in less than significant impacts in relation to an increase in hazards due geometric design feature or incompatible uses, pedestrian routes would potentially be impacted, so transportation will be analyzed further in the *Traffic and Pedestrian Safety Technical Study* being prepared by LLG in coordination with LADOT and carried into the EIR.

d) Result in inadequate emergency access?

Potentially Significant Impact. The proposed Project would have the potential to result in significant impacts in relation to inadequate emergency access during construction and implementation of the new design. Such Projects are required to accommodate ingress and egress of emergency vehicles, as required by the affected jurisdiction where the individual Project would be implemented.[152] As this Project must conform to local ordinances to ensure emergency access, before and after the Project is constructed and implemented, there would be no anticipated access issues for the campus in operation or during construction. If streets within and immediately adjacent to the campus may need to be repaved and restriped in coordination with LADOT during a phase of construction, emergency access may be impacted from those entrances. Construction phasing would also feature the upgrade of parking lots and playgrounds and change areas above the fault into outdoor areas, such as landscapes, hardscapes, and parking for earthquake safety, which could temporarily impact emergency access to specific areas of the campus during construction. However, access features must accommodate and satisfy the local fire department for the Project site. There would be less than significant impacts in relation to inadequate emergency access during operation of the school. As there is potential for temporary Project-related impacts during construction, transportation will be analyzed further in the *Traffic and Pedestrian Safety Technical Study* being prepared by LLG and carried into the EIR.

[152] Los Angeles Unified School District. 2015. School Upgrade Program Final Environmental Impact Report, http://achieve.lausd.net/ceqa. Adopted by the Board of Education on November 10, 2015.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

XIX. TRIBAL CULTURAL RESOURCES.

Has a California Native American Tribe requested consultation in accordance with Public Resources Code section 21080.3.1(b)?

☐ Yes ☒ No

Would the Project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

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 Section 5020.1(k)?	☐	☐	☒	☐
b. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?	☐	☐	☒	☐

Explanation:

LAUSD has SCs for minimizing impacts to tribal cultural resources. Applicable SCs related to tribal cultural resources impacts associated with the proposed Project are provided below:

LAUSD Standard Conditions of Approval	
SC-TCR-1	All work shall stop within a 30 foot radius of the discovery. Work shall not continue until the discovery has been assessed by a qualified Archaeologist. Based on this initial assessment the affiliated Native American Tribal representative has contacted and consulted to provide as-needed monitoring or to assist in the accurate assessment, recordation, and if appropriate, recovery of the resources, as required by the District.
SC-TCR-2	In the event that Tribal cultural resources are identified, the Archaeologist will retain a Native American Monitor to begin monitoring ground disturbance activities. The Native American Monitor shall be approved by the District and must have at least one or more of the following qualifications: • At least one year of experience providing Native American monitoring support during similar construction activities. • Be designated by the Tribe as capable of providing Native American monitoring support. • Have a combination of education and experience with Tribal cultural resources. Prior to reinitiating construction, the construction crew(s) will be provided with a brief summary of the sensitivity of Tribal cultural resources, the rationale behind the need for protection of resources, and information on the initial identification of Tribal cultural resources. This information shall be included in a worker's environmental awareness program that is prepared by LAUSD for the project (as applicable).

	Subsequently, the Monitor shall remain on-site for the duration of the ground-disturbing activities to ensure the protection of any other potential resources. The Native American Monitor will complete monitoring logs on a daily basis. The logs will provide descriptions of the daily activities, including construction activities, locations, soil, and any Tribal cultural resources identified.

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 section 5020.1(k)?

Less than Significant Impact. The proposed Project would result in less than significant impacts in relation to causing a substantial adverse change in the significance of a tribal cultural resource that has been determined to be eligible for listing in the California Register of Historical Resources (CRHR). No known archaeological resources, inclusive of the consideration of tribal cultural resources, occur on the proposed Project site or within a quarter-mile radius. Archaeological resources are not anticipated to be present on the Project site. However, indigenous people occupied the entire area of what is now known as Los Angeles, and there is potential for the unanticipated discovery of tribal cultural resources during the excavation of native soils. Additionally, the school site was originally constructed in the 1930s, prior to the level of protection afforded to cultural resources in conjunction with the adoption of CEQA. In the unlikely event that tribal cultural resources are discovered during construction, LAUSD shall implement SC-TCR-1 and SC-TCR-2 for evaluating and appropriately treating the archeological resources. Therefore, there would be less than significant impacts related to the potential to encounter tribal cultural resources that have been determined eligible for listing in the CRHR. No further study is warranted.

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

Less than Significant Impact. The proposed Project would result in less than significant impacts in relation to causing a substantial adverse change in the significance of a tribal cultural resource that has been determined by LAUSD to warrant preservation. LAUSD has not identified any tribal cultural resources that warrant preservation pursuant to Public Resources Code Section 5024.1.[153] The District sent out a comment request letter to twenty-one (21) local tribes within the Los Angeles Area on August 25, 2023. The letter included the Project description. Tribes have 30 days to submit comments or request consultation to LAUSD. It is unlikely that tribal cultural resources are present on the proposed Project site; however, it is possible that construction activities could unearth resources. In the unlikely event that tribal cultural resources are discovered during construction, LAUSD shall implement SC-TCR-1 and SC-TCR-2 for evaluating and appropriately treating the archeological resources. As a result, there would be less than significant impacts related to the potential to encounter tribal cultural resources that warrant designation by LAUSD. No further study is warranted.

[153] LAUSD. 2004. New School Construction Program, Program Environmental Impact Report.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XX. UTILITIES AND SERVICE SYSTEMS. Would the project:				
a. Require or result in the relocation or construction of construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunication facilities, the construction or relocation of which could cause significant environmental effects?	☐	☐	☐	☒
b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	☐	☐	☐	☒
c. Result in a determination by the wastewater treatment provider that 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?	☐	☐	☐	☒
d. Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☐	☐	☒
e. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☐	☒

Explanation:

LAUSD has SCs for minimizing impacts to utilities and service systems. Applicable SCs related to utilities and service systems impacts associated with the proposed Project are provided below:

LAUSD Standard Conditions of Approval	
SC-USS-1	Consistent with current LAUSD requirements for recycling construction and demolition waste, the Construction Contractor shall implement the following solid waste reduction efforts during construction and demolition activities: **School Design Guide.** Establishes a minimum non-hazardous construction and demolition (C&D) debris recycling requirements of 75% by weight. Construction and demolition waste shall be recycled to the maximum extent feasible. **Construction & Demolition Waste Management.** This document outlines procedures for preparation and implementation, including reporting and documentation, of a Waste Management Plan for reusing, recycling, salvaging or disposal of non-hazardous waste materials generated during demolition and/or new construction 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 by weight.

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SC-USS-2	LAUSD shall coordinate with the City of Los Angeles Department of Water and Power or other appropriate jurisdictions and departments prior to relocating or upgrading any water facilities to reduce the potential for disruptions in service.
SC-USS-3	LAUSD shall provide an easily accessible area that services the entire school and is dedicated to the collection and storage of materials for recycling, including (at a minimum) paper, cardboard, glass, plastics, metals, and landscaping waste. There shall be at least one centralized collection point (loading dock), and the capacity for separation of recyclables where waste is disposed of for classrooms and common areas such as cafeterias, gyms, or multi-purpose rooms.
SC-GHG-1	Implementation of SC-GHG-1.
SC-GHG-2	Implementation of SC-GHG-2.
SC-GHG-3	Implementation of SC-GHG-3.

The Project site is currently serviced by the City of Los Angeles Department of Water and Power (LADWP). According to the Site Analysis & Program Development Report, the school currently has a Cold Water Supply of 683 fixture unit (FU).[154] The site has a drainage fixture total of 590 FU. The site is 11.2 acres.

Irving MS, like all LAUSD schools, is served by Republic Services for solid waste disposal, with the nearest transfer station being the East Los Angeles Transfer Station at 1512 N. Bonnie Beach Pl, Los Angeles, CA 90063.

There are two main city storm drain lines that are currently serving the school. One is a 33-inch line located in Fletcher Drive, and the second is a 12-inch line located in the middle of the school within the City of Los Angeles Easement. Each building has a cold-water pipe between 1 inch and 2.5 inches. The school's highest point is roughly in the center of the site, and it slopes down in all directions at a rate of approximately 1 percent.

Irving MS receives its energy from the LADWP, which provides more than 25 million megawatt-hours of electricity to service 1.4 million residential and business customers. The main electrical service is 2,500 amp bus with 2,500A main breaker at 48-V, three phase, four wire. The main switchboard has a NEMA 3R enclosure and is rated at 65,000 Ampere Interrupting Capacity (AIC). The utility transformer and main switchboard are located in Electrical Service yard at the southeast side of the campus along Marguerite Street. There is an additional electrical service and switchboard (MS2) at the southwest side of the campus with the portable classrooms area. The electrical service at this location is 600A at 240V, 1 phase, 3 wire. The utility transformer is pole mounted and located adjacent to switchboard MS2. Irving MS is serviced by two gas meters, one on Marguerite Avenue and one along Estara Avenue.

[154] Los Angeles Unified School District. 2023. Irving STEAM Magnet Middle School, Site Analysis & Program Development Report. Prepared by NAC Architecture.

a) Require or result in the relocation or construction of construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunication facilities, the construction or relocation of which could cause significant environmental effects?

No Impact. The existing school, which opened in 1937, has severely outdated mechanical systems. The heating, ventilation, and air-conditioning (HVAC) systems currently serving the buildings on the Irving MS campus are rooftop packaged units, Bard units, gas-fired heating units, air handling units and direct expansion (DX) cooling split systems that serve the buildings. Various updates of these units would be required for compliance with current codes and LAUSD standards. The recommended, comprehensive HVAC replacement throughout the campus facilities would improve energy efficiency, eliminate/reduce the use of gas for HVAC systems, and provide conditioned spaces to students and staff. It has been specifically recommended that the buildings be furnished with packaged rooftop DX heat pump units. This upgrade is not anticipated to require substantially more electrical power than the existing power used for heating and cooling, as the new equipment would be more efficient to meet current building code standards. The proposed Project shall consider stormwater drainage in their final plans, as required by SC-HWQ-1 and have considered designs that reduce stormwater runoff to avoid overextending the existing City storm drain systems that surround the school. The existing school is serviced by the LADWP for both water and power needs. LADWP has established an UWMP that forecasts future water demands and water supplies for average and dry year conditions.[155] The proposed Project would be adequately served by the existing LADWP facilities, and new or relocated facilities would not be required. As such, none of the improvements discussed above would require the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunication facilities. No further study is warranted.

b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?

No Impact. The proposed Project would have no impact in regard to sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, dry and multiple dry years. The existing school is serviced by LADWP, which has established a UWMP that forecasts future water demands and water supplies for average and dry year conditions.[156] The Project is not anticipated to result in an increase in student capacity, as the number of standard classrooms on the Project site will decrease from 65 to 46. Therefore, there would be no impact. No further analysis is warranted.

c) Result in a determination by the wastewater treatment provider that 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's wastewater treatment provider would have adequate capacity to serve the Project's projected demand in addition to the provider's existing commitments. The Project site is currently serviced by the Los Angeles Public Works Consolidated Sewer Maintenance District. The Project would not result in an increase in student capacity. Additionally, the new plumbing fixtures in the new buildings would be required to meet the current building code requirements for water efficiency, which would be more water-efficient than the existing plumbing fixtures. As a result, any increase in wastewater from the new buildings

[155] LADWP.com. www.ladwp.com/ladwp/faces/ladwp/aboutus/a-water?_adf.ctrl-state=gfsvhsaxn_38&_afrLoop=11019765019992.
[156] LADWP.com. www.ladwp.com/ladwp/faces/ladwp/aboutus/a-water?_adf.ctrl-state=gfsvhsaxn_38&_afrLoop=11019765019992.

would have a negligible effect on the wastewater treatment provider. Therefore, the proposed Project's wastewater treatment provider would have adequate capacity to serve the Project's projected demand in addition to the provider's existing commitments. Therefore, there would be no impacts related to violating applicable federal, state, and local statutes and regulations related to solid waste diversion, reduction, and recycling. No further analysis is warranted.

d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

No Impact. The proposed Project would not negatively impact the provision of solid waste services or impair the attainment of solid waste reduction goals. The proposed Project would comply with SC-USS-1, which states that Irving MS must be consistent with current LAUSD requirements for recycling construction and demolition waste. Furthermore, the School Design Guide (as part of SC-USS-1) establishes a minimum non-hazardous construction and demolition debris recycling requirements of 75 percent by weight. Construction and demolition waste shall be recycled to the maximum extent feasible. The Construction & Demolition Waste Management program outlines procedures for preparation and implementation, including reporting and documentation, of a Waste Management Plan for reusing, recycling, salvaging or disposal of non-hazardous waste materials generated during demolition and/or new construction to foster material recovery and reuse and to minimize disposal in landfills. Implementation of the proposed Project would comply with all City, County, and State solid waste diversion, reduction, and recycling mandates, including compliance with the City of Los Angeles Annual Report, Countywide Integrated Waste Management Plan (CIWMP), the Los Angeles Municipal Code, and LAUSD BMPs.[157] Additionally, the student population would remain comparable to the most recent 5 years of enrollment, and the proposed Project would reduce the number of classrooms on campus by 23 rooms. Therefore, there would be no impact. No further analysis is warranted.

e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

No Impact. Implementation of the proposed Project would comply with all federal, state, and local management and reduction statutes and regulations related to solid waste. The proposed Project would comply with the City of Los Angeles's Annual Report, CIWMP, the Los Angeles Municipal Code, and LAUSD BMPs.[158] For the construction phase, the site would comply with SC-USS-1 standards. For the operation and maintenance phase, the site would comply with SC-USS-3 standards. Additionally, the student population would remain comparable to the most recent 5 years of enrollment with the proposed improvements reducing the number of classrooms from 65 to 46. As a result, the solid waste facility that services the site would continue to have adequate capacity. Therefore, LAUSD would comply with all federal, state, and local statutes and regulations related to solid waste during construction and operation of the proposed Project. No further analysis is warranted.

[157] https://calrecycle.ca.gov/lgcentral/library/policy/ciwmpenforce/
[158] LAUSD, School Upgrade Program Final Environmental Impact Report (EIR) (incorporates the New School Construction Program, Draft PEIR), Published September 2014. Board Certified June 8, 2004, Draft PEIR p. 3.15-20.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XX. WILDFIRE.				
Is the project located in or near state responsibility areas or lands classified as high fire hazard severity zones?				
If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
	☐ Yes		☒ No	
a. Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☐	☐	☒	☐
c. Require the installation of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☐	☐	☒	☐
d. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☒	☐

Explanation:

a) Substantially impair an adopted emergency response plan or emergency evacuation plan?

Less than Significant Impact. The proposed Project would result in less than significant impacts to wildfire in relation to the impairment of adopted emergency response and/or emergency evacuation plans located in or near State Responsibility Areas (SRA) or lands classified as Very High Fire Hazard Severity Zones (VHFHSZ). The Project site is not located within an SRA or lands classified as VHFHSZ. While the Project site, which is located in the City of Los Angeles, is within a Local Responsibility Area (LRA), it is not within a fire hazard severity zone. According to the California Department of Forestry and Fire Protection (CAL FIRE)'s website,[159] the Fire Hazard Severity Zone Maps for both LRAs and SRAs indicate that the Planning Area is located approximately located approximately 0.2 mile away from the nearest LRA VHFHSZ to the north and 7.5 miles away from the nearest SRA VHFHSZ to the northeast (**Figure 15: Fire Hazard Severity Map**).[160]

[159] California Department of Forestry and Fire Protection (CAL FIRE), Fire and Resource Assessment Program (FRAP). Adopted by CAL FIRE on November 7, 2007. Fire Hazard Severity Zones in SRA. Los Angeles County. Map available at: http://www.fire.ca.gov/fire_prevention/fhsz_maps_losangeles (accessed August 8, 2023).

160 California Department of Forestry and Fire Protection, Office of the State Fire Marshall. N.d. Fire Hazard Severity Zones Maps. https://osfm.fire.ca.gov/divisions/wildfire-prevention-planning-engineering/wildland-hazards-building-codes/fire-hazard-severity-zones-maps/ (accessed August 10, 2023).

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The City's freeways, highways, and arterial routes are pre-identified as disaster routes for use during times of crisis or emergency.[161] While the roadways are not evacuation routes, an emergency may warrant the use of a road as both disaster and evacuation routes. In addition, "primary evacuation routes consist of major interstate highways and primary arterials within the City and Los Angeles County," as noted in the Safety Element of the City's General Plan of the City's Emergency Operations Plan (EOP) Evacuation Annex.[162] The City's disaster routes, as depicted in the City of Los Angeles Public Works' Disaster Route Maps: Area H, Los Angeles – Central Area Map,[163] includes freeway disaster routes, SR-2 and Interstate 5 (I-5), and disaster routes, Fletcher Drive and San Fernando Road. The Glendale Freeway (SR-2) is to the southeast of the Project site and I-5 is to the southwest of which both freeway disaster routes are accessible via Fletcher Drive and San Fernando Road from the Project site. Furthermore, as stated in Section 3.16, *Public Services*, fire protection services are currently provided to Irving MS by LAFD Station 50, located approximately 545 feet southwest of the Project site and would provide fire protection services in case of emergency (see Table 7).

The proposed Project would consist of the demolition of four buildings; the removal of six portable buildings; the construction of one 2-story building; parking lot, playground, other outdoor improvements, and ADA accessibility upgrades; and the seismic retrofit of the Auditorium. There would be no increase in enrollment as the improvements are for existing faculty, staff, and students, and entry access points would not be altered or relocated and would remain intact. In addition, the proposed Project would result in a reduction in classrooms, thereby accommodating with a reduction in pupils per class to meet safety standards. LAUSD schools are required to comply with California Education Code Section 32280-9, which mandates the preparation of school safety plans that needs to be updated annually. These plans address violence prevention, emergency preparedness, traffic safety and crisis intervention. The Safe School Plan covers emergency preparedness and response and crisis intervention and uses the Incident Command System (ICS). ICS is designed to centralize and coordinate emergency response actions among police, fire, and other public agencies, including school districts. LAUSD's Safe School Plan is compliant with the National Incident Management System (NIMS) and the California Standardized Emergency Management System (SEMS). The Project site is an active middle school campus with an existing Safe School Plan that follows the LAUSD Integrated Safe School Plan.[164] While schools are required to comply with California Education Code Section 32280-9, the Safe School Plan 2023-2024 for Irving MS was not accessible for review as it is in the process of being updated. It is anticipated to be available on October 2, 2023.

The emergency response and/or evacuation plans would not be adversely affected as a result of the proposed Project as the Project site and staging area would be fenced off and construction would not obstruct any major roads. Therefore, the proposed Project would not substantially impair an adopted emergency response plan or emergency evacuation plan in or near SRAs or lands classified as VHFHSZ. No further analysis is warranted.

[161] Los Angeles County Public Works. Accessed April 5, 2023. Los Angeles county Operational Area: Disaster Routes. Available at: https://dpw.lacounty.gov/dsg/DisasterRoutes/
[162] City of Los Angeles. Adopted November 24, 2021. City of Los Angeles Safety Element of the General Plan. Accessed August 10, 2023. Available at: https://planning.lacity.org/odocument/bf51ae04-1c7b-4931-9a29-d46209998b89/Safety_Element.pdf
[163] Los Angeles County Public Works. Accessed April 5, 2023. Los Angeles county Operational Area: Disaster Routes. Available at: https://dpw.lacounty.gov/dsg/DisasterRoutes/
[164] LAUSD. 2001. Integrated Safe School Plan 2021-2022 Highlights. Available at https://ca01000043.schoolwires.net/cms/lib/CA01000043/Centricity/Domain/318/New%20ISSP%20Components%202021-22%20final.pdf (accessed August 10, 2023).

b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

Less than Significant Impact. The proposed Project would not exacerbate wildfire risks due to slope, prevailing winds, and other factors, and thereby expose Project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire in or near an SRA or lands classified as VHFHSZ.

The proposed Project site is located within the shallow-sloped Los Angeles basin. According to the U.S. Department of Homeland Security, Federal Emergency Management Agency (FEMA), and the Safety Element of the City of Los Angeles General Plan, the Project site is not located within a flood zone or flood hazard area.[165,166,167] The Project site is not located within a City-identified high wind velocity area.[168] The Project site is predominantly paved, with landscaping concentrated around the perimeter. There is no dense vegetation on the Project site; the trees and shrubs are well spaced.

As stated in the *Hazards and Hazardous Materials* section, LAUSD has SCs for minimizing impacts to hazards and hazardous materials. The Project site is a developed middle school campus within an urbanized area in the Los Angeles basin and would continue to be an active middle school campus with implementation of the proposed Project. SC-HAZ-2, regarding the Pipeline Safety Hazard Analysis, would be employed to ensure that there is existing separation between any hazardous materials, pipelines, and school facilities. The nearest natural gas pipelines are located southwest of the Project site, below North San Fernando Road.[169] As stated in the *Public Services* section, SC-PS-2 would be implemented during operation to further reduce potential impacts by maintaining emergency preparedness and response procedures at Irving MS. Moreover, the proposed Project would be required to comply with the local fire code, which includes portions of the California Fire Code (Title 32), California Building Standards Code (Title 24), and Title 5 relating to Education regulations.[170,171,172] Therefore, with incorporation of the SCs, the proposed Project would not exacerbate wildfire risks. No further analysis is warranted.

[165] Los Angeles Department of City Planning. n.d. ZIMAS. Available at: http://zimas.lacity.org/ (accessed August 10, 2023).
[166] U.S. Department of Homeland Security, Federal Emergency Management Agency. N.d. FEMA Flood Map Service Center: Search By Address. Address: 3010 E Estara Ave. Glendale 90065. Available at: https://msc.fema.gov/portal/search?AddressQuery=1447%20e%2045th%20street%2C%20los%20angeles%20ca%2090011#searchresultsanchor (accessed August 10, 2023).
[167] City of Los Angeles. November 2021. City of Los Angeles General Plan. Safety Element. https://planning.lacity.org/odocument/bf51ae04-1c7b-4931-9a29-d46209998b89/Safety_Element.pdf
[168] Los Angeles Department of City Planning. n.d. ZIMAS. Available at: http://zimas.lacity.org/ (accessed August 10, 2023).
[169] Southern California Gas Company, a subsidiary of Sempra Energy. N.d. Natural Gas Pipeline Map. Available at: https://socalgas.maps.arcgis.com/apps/webappviewer/index.html?id=c85ced1227af4c8aae9b19d677969335 (accessed August 10, 2023).
[170] Los Angeles County elaws.us. N.d. Tile 32 – Fire Code. Accessed on 8/25/23. Available at: http://lacounty-ca.elaws.us/code/coor_title32
[171] California Department of Education. Title 5, California Code of Regulations (CCR), Section 14010[p].
[172] Department of General Services for the State of California. N.d. Building Standards Commission Codes: Title 24. Accessed on 8/25/23. Available at: https://www.dgs.ca.gov/BSC/Codes

c) Require the installation of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

Less than Significant Impact. The proposed Project would result in less than significant impacts to associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities) that may exacerbate fire risk or that may result in the temporary or ongoing impacts to the environment in or near an SRA or lands classified as VHFHSZ. The Project site is located approximately 0.2 mile south of an LRA.

The Project site is a developed middle school campus within an urbanized area in the Los Angeles basin and would continue to be an active middle school campus with implementation of the proposed Project. The proposed Project would not require the installation or maintenance of roads, fuel breaks, emergency water sources, or power lines are the Project site is already served by this infrastructure. The proposed Project would involve the replacement of utilities for the replacement buildings. The proposed Project would be required to comply with the local fire code, which includes portions of the California Fire Code (Title 32), California Building Standards Code (Title 24), and Title 5 relating to Education regulations.[173,174,175,176] Therefore, the proposed Project would not exacerbate fire risk. No further analysis is required.

d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

Less than Significant Impact. The proposed Project would result in less than significant impacts in regard to exposing people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes in or near an SRA or lands classified as VHFHSZ. The Project site is located near an LRA within a VHFHSZ, but the Project site is relatively flat, within the shallow sloped Los Angeles basin. The elevation of the Project site ranges from approximately 390 feet above mean sea level on the western end of the proposed Project (corner of Fletcher Drive and Moss Avenue) to approximately 415 feet above mean sea level almost at the center of the site between the Administration Building and the Cafeteria. As stated in the *Hydrology and Water Quality* section, the proposed Project would not 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 that would result in flooding on- or off-site. The geotechnical study for the proposed Project (Appendix D) found that there would be no potential for landslide hazards on the proposed site based on the low grades of the site and the surrounding area and grading at the site would not substantially alter the grades that would constitute a potential for landslides at the Project site. Furthermore, the proposed Project would be required to comply with the local fire code which includes portions of the California Fire Code (Title 32), California

[173] Los Angeles County elaws.us. N.d. Tile 32 – Fire Code. Accessed on 8/25/23. Available at: http://lacounty-ca.elaws.us/code/coor_title32
[174] California Department of Education. Title 5, California Code of Regulations (CCR), Section 14010[p].
[175] Department of General Services for the State of California. N.d. Building Standards Commission Codes: Title 24. Accessed on 8/25/23. Available at: https://www.dgs.ca.gov/BSC/Codes

Building Standards Code (Title 24), and Title 5 relating to Education regulations.[177,178,179] [180] Therefore, the proposed Project would not expose people or structures to significant risks as a result of runoff, post-fire slope instability, or drainage changes in or near an SRA or lands classified as VHFHSZ. No further analysis is warranted.

[177] Los Angeles County elaws.us. N.d. Tile 32 – Fire Code. Accessed on 8/25/23. Available at: http://lacounty-ca.elaws.us/code/coor_title32

[178] California Department of Education. Title 5, California Code of Regulations (CCR), Section 14010[p].

[179] Department of General Services for the State of California. N.d. Building Standards Commission Codes: Title 24. Accessed on 8/25/23. Available at: https://www.dgs.ca.gov/BSC/Codes

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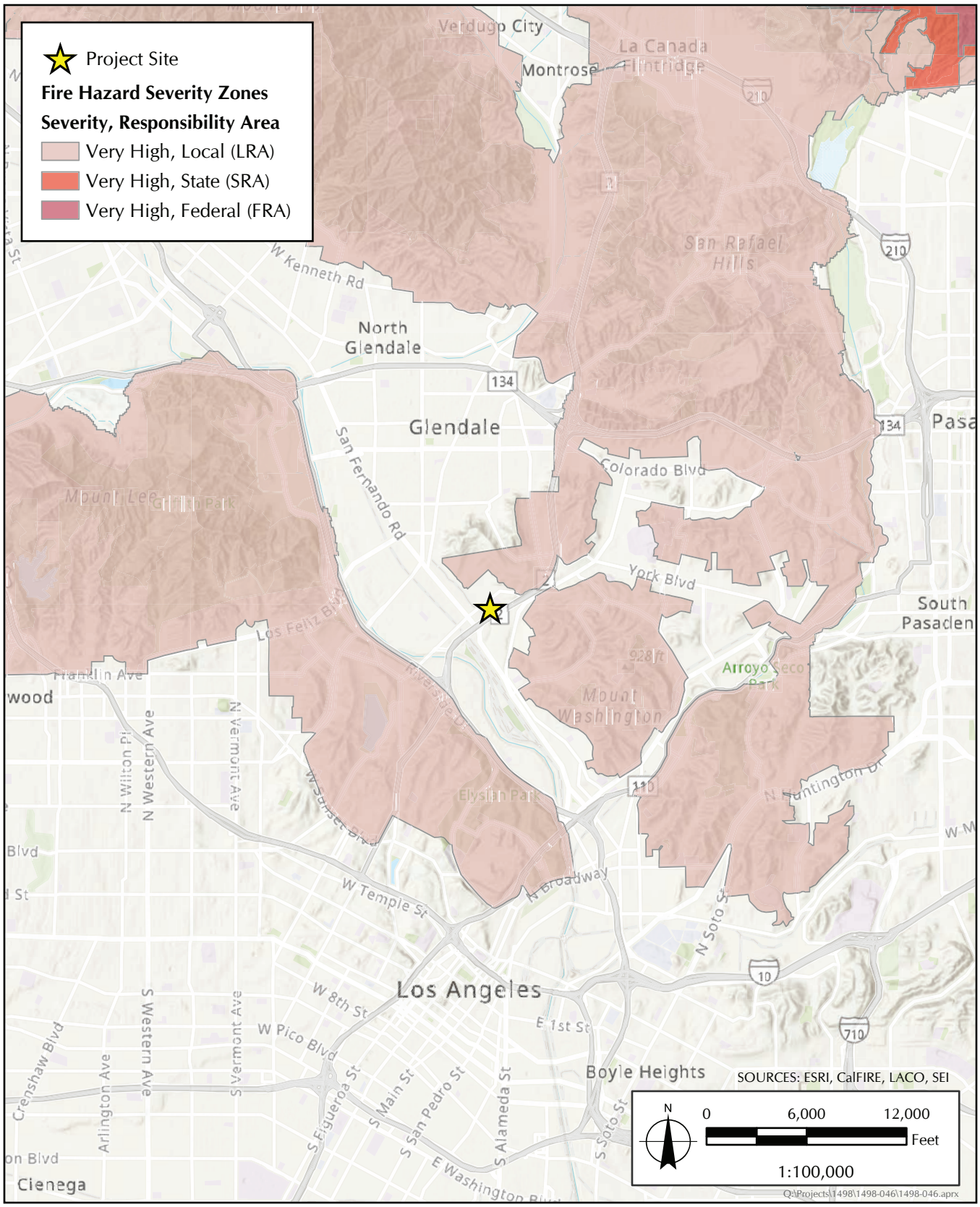

FIGURE 15

Fire Hazard Severity Map

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

Explanation:

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?

Potentially Significant Impact. The proposed Project would result in potentially significant impacts that need to be evaluated in an EIR because although the Project site is an existing K–8 school campus located in an urbanized environmental with minimal habitat, it is eligible for historic significance (see Appendix B). The proposed Project does not have the potential to substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, or reduce the number or restrict the range of a rare or endangered plant or animal (see Section IV, *Biological Resources*). Operation of the proposed Project would improve the quality of the educational environment by building replacement and reconfiguration on the Campus as part of the update to the SUP. The modernization of the campus would facilitate a safe and secure campus that is better aligned with the current instructional program and meets current DSA educational specifications. Structurally unsound and/or inadequate buildings would be demolished and replaced by a new building that would improve educational quality and safety for students and staff. The proposed Project also includes essential upgrades including new exterior and interior paint, IP convergence, the removal of barriers and other accessibility upgrades, and various landscape and hardscape improvements.

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Although the proposed Project would have the potential to cause a substantial adverse change in the significance of a historical resource, it would not eliminate important examples of the major periods of California history or prehistory because it is not the only example of PWA Moderne in the City of Los Angeles. As documented in the HRER, the subject property is eligible for federal, state, or local, designation, and the campus is considered a historical resource for the purpose of CEQA.[181] The PWA Moderne campus core, which was constructed from 1936 to 1939, includes six original campus buildings:

1. Administration Building
2. Auditorium Building
3. Gymnasium (Physical Education) Building
4. Cafeteria Building
5. Shop No. 1
6. Shop No. 2

Irving MS was given a status code of 3S, or recommended eligible for listing in the NRHP, through survey evaluation.[182] The survey report for the Northeast Los Angeles CPA identified the school as a potentially eligible historic district with status codes of 3S, 3CS, and 5S3, that is, appears eligible for the NRHP, the CRHR, and locally through survey evaluation. Under Criteria A/1, the campus was described as "an excellent intact example of a post–Long Beach Earthquake middle school campus" that "embodies LAUSD school planning and design concepts of the period." Under Criteria C/3, Irving MS was described as an excellent intact example of PWA Moderne architecture applied to a middle school campus, and an important example of the work of Los Angeles architect Edwin L. Bergstrom.[183]

The findings of the Updated Program EIR were reviewed during the preparation of this document. The assumptions and data that were used to make the determination in the Updated Program do not remain valid. Six buildings within the Irving Middle School were potentially individually eligible and identified in the Los Angeles Unified School District Historic Context Statement.[184] Additionally, the HRER found the six buildings within the property were found eligible for federal, state, or local designation under the applicable criteria. Therefore, the proposed Project has the potential to result in adverse effects to historical resources, requiring the consideration of mitigation measures and alternatives in an EIR.

[181] Marilyn Novell, Shannon Davis. August 24, 2022. Final Historic Resource Evaluation Report for Irving Middle School, Los Angeles, California
[182] Heumann, Leslie, & Associates, and Anne Doehne 2002 Historic Schools of the Los Angeles Unified School District. Science Applications International Corporation, a presentation prepared for LAUSD Facilities Services Division (March 2002)
[183] Historic Resources Group (HRG) 2012 Historic Resources Survey Report: Northeast Los Angeles River Revitalization Area. Prepared for the City of Los Angeles Community Redevelopment Agency. 2017 SurveyLA Historic Resources Survey Report: Northeast Los Angeles Community Plan Area. Prepared for the City of Los Angeles Office of Historic Resources.
[184] LAUSD. 2014. LAUSD Historic Context Statement, 1870-1969. Prepared by Sapphos Environmental, Inc.

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.)

Potentially Significant Impact. The proposed Project is one of several school modernization projects evaluated in the SUP EIR. The SUP EIR identified potentially significant impacts regarding air quality, cultural resources (historical resources), hazards/hazardous materials, noise, pedestrian safety, and transportation that will be evaluated in further detail in the EIR. As stated in in Section 4, the proposed Project would result in less than significant impacts in relation to environmental issue areas including aesthetics, agriculture/forestry resources, biological resources, energy, geology/soils, greenhouse gas emissions, hydrology/water quality, land use/planning, mineral resources, population/housing, public services, recreation, tribal cultural resources, utilities/service systems, and wildfire. As the related school projects are dispersed throughout Los Angeles County, air quality and noise impacts from the proposed Project in relation to other projects would not be cumulatively considerable. As with the SUP EIR, there is a potential for significant impacts to historical resources that will be evaluated further in the EIR from replacement of the historically eligible Administration Building. The two shop buildings and three other original PWA Moderne campus core buildings on the Project site would be retained: Auditorium, Cafeteria, and Physical Education Building. There is a potential for the proposed Project to result in temporary significant impacts during construction activities to air quality, hazards/hazardous materials, noise, pedestrian safety, and transportation that will be evaluated further in the EIR. Therefore, there is a potential for contribution to cumulatively considerable significant impacts, and further analysis is required.

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

Potentially Significant Impact. The proposed Project would result in potentially significant impacts regarding temporary construction impacts from air quality emissions, hazards/hazardous materials, and noise/vibration to the nearest sensitive receptors: students on campus near the construction activities. Construction of the proposed Project would expose sensitive receptors to air pollutant concentrations (see Section III, *Air Quality*) and result in generation of a substantial temporary increase in ambient noise levels in the vicinity of the Project in excess of standards established in the local general plan or noise ordinance, or in other applicable local, state, or federal standards (see Section XIII, *Noise*). Individual pieces of construction equipment that would be used during construction of the proposed Project could potentially generate maximum noise levels ranging from 79 to 85 dBA at the Federal Highway Administration's reference distance of 50 feet from the noise source. While these maximum noise levels would occur when equipment is operating under full power conditions (i.e., with the equipment engine at maximum speed), construction equipment often operates under less than full power on site. The transport of workers and materials to and from the construction site would incrementally increase noise levels along local roadways. Individual construction vehicle pass-by trips may create momentary noise levels of up to approximately 85 dBA (maximum sound level, or Lmax) at 50 feet from the vehicle, but these occurrences would generally be short-lived, and during daytime hours. Construction noise levels could be reduced up to 20 dBA with implementation of standard mitigation measures related to construction noise during grading, the estimated loudest phase, to approximately 65 dBA at 50 feet. Impacts related to construction noise levels would require consideration of mitigation measures and thus would be carried forward for

additional evaluation. The proposed Project would have the potential to result in significant impacts to noise during construction, requiring the consideration of mitigation measures and alternatives in the EIR.

The proposed Project would result in potentially significant impacts in regard to the routine transport, use, or disposal of hazardous materials during construction activities due to the unknown conditions of the soil and presence of asbestos and lead based paints in the structures; impacts are expected to be less than significant after mitigation. Construction of the proposed Project would involve very little transport, storage, use, or disposal of hazardous materials. All hazardous materials generated from demolition would be stored, handled, and disposed of in accordance with local, county, and state laws that protect public safety. Some examples of hazardous materials currently present on the property are paints, unidentified "flammable Liquids" potential corrosive chemicals in small quantities, and approximately 150-gallons of Hillard Power-Strip stored in their original containers (see Appendix A). Three hydraulic elevators are present onsite and appear to be aged. Additional potential hazardous materials may be present during the construction phase, such as PCBs, asbestos, and paints but would be regulated by SC-HAZ-4, the construction contractor shall comply with Remedial Activities Workplan, specifically the Los Angeles Unified School District Reference Guide REF-4149.2 Disposal Procedures for Hazardous Waste and Universal Waste.[185] Furthermore, these types of materials are not acutely hazardous, and all storage, handling, and disposal of these materials is regulated by the DTSC, the EPA, the OSHA, and the LAFD. Although the Project would adhere to the aforementioned regulations, the Phase I ESA determined that there is a potential for elevated concentrations of arsenic from historical application of herbicides and elevated concentrations of organochlorine pesticides from historical application of termiticides to be present in shallow soil at the site. No toxicity testing has been done for the soil on the site. To achieve less than significant impacts, exact concentrations of potential toxins must be determined for successful compliance with the above guidelines. Furthermore, there were areas within the school that were inaccessible during site reconnaissance and were labeled as hazardous materials storage areas. Until these two items have been fully investigated, there is a potentially significant impact in regard to transport and disposal of hazardous materials, requiring the consideration of mitigation measures and alternatives in the EIR.

The proposed Project is an educational facility and would not involve the routine transport, storage, production, use, or disposal of hazardous materials or use of pressurized tanks during operation. Small amounts of pesticides may be stored for the maintenance of landscaped areas and limited quantities of custodial and maintenance products, including commercial cleansers, lubricants, and paints would also be stored on-site.

According to the Phase I ESA (Appendix A), Irving MS was listed in the following environmental databases: CERS Hazwaste, Hazmat, HAZNET, FTTS, RCRA-LQR, FINDS, and ECHO. Violations regarding failures to maintain Hazardous Waste Manifests, active generator permit, and improper labeling were reported in 2015, 2016, 2018, and 2019. The site is listed in the HAZNET database for the tracking of generated hazardous waste including asbestos-containing waste from 1990 to 2019; and laboratory waste, paint sludge, and organics from 1997 to 2014. All listings relate to tracking and, therefore, none of these listings represent an obvious environmental concern. In addition, no additional off-site listings were considered an environmental concern (see Appendix A). However, the Phase I ESA determined that there is a potential for elevated concentrations of arsenic from historical application of herbicides and elevated concentrations of organochlorine pesticides

[185] Los Angeles Unified School District Reference Guide. REF-4149.2. Disposal Procedures for Hazardous Waste and Universal Waste. June 12 , 2020. https://www.lausd.org/cms/lib/CA01000043/Centricity/Domain/135/REF-4149.2%20Hazardous%20Waste%20.pdf

from historical application of termiticides to be present in shallow soil at the site. There is a potentially significant impact in regard to accident conditions involving the release of hazardous materials into the environment, requiring the consideration of mitigation measures recommended in the PEA-E and alternatives in the EIR.

The proposed Project would result in potentially significant impacts in regard to the emission of hazards or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school; impacts are expected to be less than significant after mitigation. During the construction phase, it is possible children could come in contact with PCBs, asbestos, paints, or petroleum products (see Appendix A). However, SC-HAZ-04 would ensure that the following guidelines are followed: District Specification Section 01 4524, Environmental Import / Export Materials Testing; Removal Action Workplan; California Air Resources Board Rule 1466 Guidelines and Procedures to Address PCBs in Building Materials, particularly applicable to buildings that were constructed or remodeled between 1959 and 1979; lead and asbestos abatement requirements identified by the FETU in the Phase I/Phase II; or abatement plan(s). It should be noted that the school is located within a moderate radon zone. The high radon zone is defined as having a high potential for radon levels to be above 4 pCi/L. As stated in the LAUSD Reference Guide REF-5314.2, Procedures for Environmental Review of Proposed Projects: "building design and construction Measures – Should a building or similar structure be constructed or renovated for student and/or staff occupancy and is located in a "high" radon zone, U.S. EPA guidance entitled "radon Prevention in the Design and Construction of Schools and Other Large Buildings, EPA/625/R-92/016, June 1994" (or latest published version) shall be reviewed and all relevant and appropriate measures incorporated in its design and construction to prevent radon gas infiltration (see the LAUSD Radon Memorandum in Appendix A). Although the Project would adhere to the aforementioned regulations, the Phase I ESA determined that there is a potential for elevated concentrations of arsenic from historical application of herbicides and elevated concentrations of organochlorine pesticides from historical application of termiticides to be present in shallow soil at the site. There is a potentially significant impact in regard to hazardous emissions or handling of hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school, requiring the consideration of mitigation measures recommended in the PEA-E and alternatives in the EIR.

Therefore, there would be temporary substantial adverse effects on human beings, either directly or indirectly, during construction activities, requiring the consideration of mitigation measures and alternatives in the EIR.

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Appendix

Appendices are on USB Drive

A. Phase I Environmental Site Assessment
B. Historic Resource Evaluation Report
C. Tree Inventory from Site Analysis & Program Development Report
D. Geotechnical Investigation
E. Natural History Museum Record Search
F. Preliminary Environmental Assessment Equivalent Document

Appendix

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